



Carl Mercer
Sandwell Metropolitan Borough Council
Directorate of Regeneration & Growth
Development Planning
Sandwell Council House
PO Box 2374
Freeth Street
Oldbury
West Midlands
B69 3DE

16 February 2022

Dear Carl,

Re: Gower Tip, Lower City Road Oldbury – Planning Application DC/21/66208. Response to Additional CRTR Comments

Further to your email dated 25th January 2022 containing the additional comments from the Canal and Rivers Trust (letter reference CRTR-PLAN-2021-34320) in relation to the above planning application and our subsequent call on 8th February 2022, please find detailed below our response / further information to support the application.

The table below summarises the comments outlined in the letter from Canal & Rivers Trust to Sandwell Council dated 24 January 2022 (Ref: CRTR-PLAN-2021-34320) together with ERMs response / further information:

| Canal & River Trust Comments | ERM Response |
|--|--|
| <p><i>Further details and plans / site sections required to show the extent of the fill, French drain and detention ponds adjacent to the boundary with the canal.</i></p> | <p><i>Sections/plans showing the extent of fill, proposed French drain and detention ponds along the canal boundary are presented in Attachment A.</i></p> |
| | <p><i>The northern limit of the proposed 1.4m cap is up to the existing small embankment adjacent to the existing culvert that crosses the site approximately 10m south of the canal (see response below for further info on the location of the culvert). North of the culvert the site topography drops and flattens out towards the canal. A thinner deposit of (up to 1m) of made ground / waste deposit has been identified in this area. The thin deposit of waste is proposed to be excavated and placed within the area to be capped. The excavated waste material will be replaced with imported fill material with no increase to the existing site levels. A French drain is proposed for the northern boundary as part of the surface water drainage scheme at a depth of between 0.2m and 0.4m bgl (fall from western corner to eastern corner of site) . Given that no increase in site levels are proposed within 10m of the canal boundary, no additional loading is anticipated to the existing canal wall along the northern boundary.</i></p> |
| <p><i>Excavation works within close proximity to the canal boundary to remove made ground, construct the French drain and create a detention basin, therefore further details required on the current condition or construction of the canal bank to help determine if the development would adversely impact the stability of the canal wall and structural integrity of the canal.</i></p> | <p><i>The canal bank is brick fronted (see photos in Attachment A). A detailed method statement will be prepared by the Contractor for working adjacent to the canal boundary. Works involving the excavation and replacement of fill materials adjacent to the canal will be undertaken in strips to minimise the amount of wall exposed at one time.</i></p> |
| | <p><i>Condition survey of the canal wall / bank to be undertaken by contractor prior to commencement of works in the area.</i></p> |
| <p><i>Clarify the depth of the French drain and ground levels adjacent to the canal together with any existing or proposed boundary treatment to the canal.</i></p> | <p><i>Attachment A includes sections showing the proposed works adjacent to the canal. The French drain along the boundary with the canal is proposed to be situated at a depth of between 0.2m and 0.4m bgl (fall from western corner to eastern corner of site) with proposed ground levels directly adjacent to and within 10m of the canal remaining at their current levels.</i></p> |

| Canal & River Trust Comments | ERM Response |
|--|--|
| <p><i>Further details on the surface water drainage scheme, including the siting of the perimeter drains, information on the attenuation capacity and details on the culvert that the surface water will discharge to.</i></p> | <p><i>Further information on the surface water drainage scheme can be found in the Flood Risk Assessment submitted as application, with a detailed schematic of the proposed drainage strategy included in Appendix A and further information on the design and capacity included in section 8.2. The detailed schematic has been included as Attachment B to this letter. The drainage strategy has been designed in accordance with the National Standards for Sustainable Drainage Systems, Sewers for Adoption (7th Edition) and limiting discharge criteria required by Sandwell Council. The strategy has been designed on the basis of maintaining a. The surface water drainage strategy, which includes surface attenuation ponds and drains, has been designed to attenuate runoff from the site up to a 1 in 100 year event, with a 30% climate change allowance and total attenuation volume of 2,750m³. It has been designed on the basis of providing a maximum outflow rate of 14.5l/s from the new surface into the culvert (7.25l/s from each detention pond).</i></p> |
| | <p><i>As outlined in Section 8.2 of the Flood Risk Assessment, the collected surface waters are proposed to be discharged into a culvert that passes through the site and ultimately discharges to River Tame. The location of the Culvert is presented in Appendix A of the above document and within an additional figure submitted as part of the planning application (see Existing Site Contours and Site Boundary/Access Routes figure). For ease of reference, both figures have been attached to this letter (see Attachment B and C).</i></p> |
| | <p><i>The culvert is located approximately 10m south of the canal bank and crosses the canal approximately 40m to the east of the Gower site.</i></p> |

| Canal & River Trust Comments | ERM Response |
|--|---|
| <p>Assessment of the former canal basins and whether the infilled canal basin could be providing a pollutant linkage between the site and the canal and potential for horizontal migration of groundwater to the canal (Canal & River Trust consider the assumption that the canal is clay lined not to be a valid assumption in this case).</p> | <p>The two infilled former canal basins are located to the northwest and east of the site and fall outside of the site ownership/property boundary. The tipping operations were confined to the infilling of the former clay pits located on site and did not extend beyond the boundaries of the current site i.e. waste deposits associated with the site do not extend into the infilled basins.</p> |
| |  |

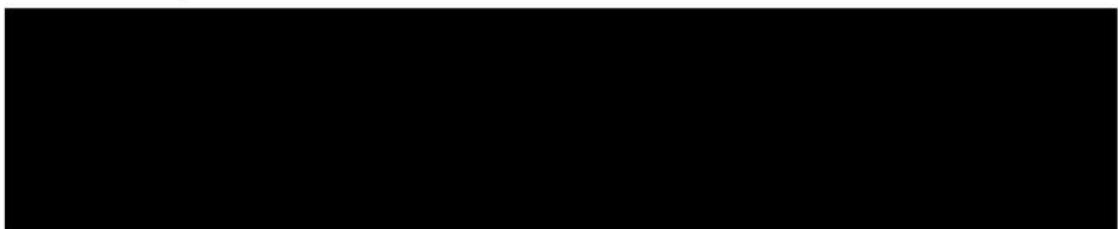
Groundwater monitoring undertaken across the site indicates a groundwater flow to the northeast, as such any potential pollutant linkage between the site and infilled canal basin to the northwest has not been identified. The basin to the east could theoretically be downgradient of the site, the inclusion of a cut-off wall on the eastern boundary would eliminate this pathway.

In order to retain water within the canal, it has been assumed that the canal extents would have been formed of clay (either from the natural deposits that directly underlie the area or clay lined during construction), limiting the potential for groundwater beneath the site to be in hydraulic continuity with the canal (a summary of the controlled waters detailed quantitative risk assessment for the site is presented within Appendix C of the Land Quality Report submitted as part of the planning application).

| Canal & River Trust Comments | ERM Response |
|---|--|
| <p><i>Further information in the Construction Environmental Management Plan for working adjacent to the Canal and mitigation measures</i></p> | <p><i>It is proposed that the Construction Environmental Management Plan will be reviewed and updated with the Principal Contractor (once appointed) to further develop the document, including further consideration and appropriate mitigation for working adjacent to the canal with specific reference made to Canal & Rivers Trust Code of Practice for Works Affecting the Canal & River Trust and Environment Agency Pollution Prevention Guidelines..</i></p> |
| <p><i>Landscaping should be set back from the waterway to allow future growth and any planting should be native species appropriate to this waterside setting with consideration for oak trees to be included in an open woodland grassland type habitat.</i></p> | <p><i>The proposed landscaping design is presented within Appendix A of the Landscape and Visual Report submitted as part of the planning application, but has been included as Attachment D to this letter for ease of reference.</i></p> |
| | <p><i>The proposed landscape design includes the planting of the southern, south eastern and north eastern boundaries of the site with a native scrub mix nursery stock which will be maintained and allowed to establish. Species rich meadow grassland mix is proposed for the remainder of the site. No large trees will be planted or allowed to establish which might otherwise compromise the effectiveness of the proposed cap. Further consideration will also be given to the landscaping immediately adjacent to the canal and potential options to "soften" the existing brick fronted canal wall, in consultation with Canal & Rivers Trust.</i></p> |
| | <p><i>The site is currently secured along the canal boundary with mesh fencing and will be maintained on completion of the works to help discourage mooring of boats and prevent unauthorised access.</i></p> |

We trust that the above responses will assist Sandwell Council in reviewing the planning application for the remediation works at Gower Tip, please do not hesitate to contact us should you require any further information or have any questions in relation to the application.

Yours sincerely



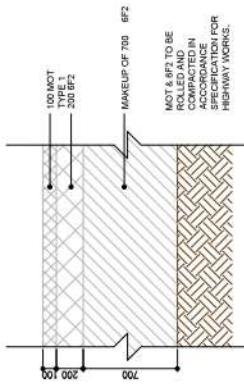
Technical Director

Principal Consultant



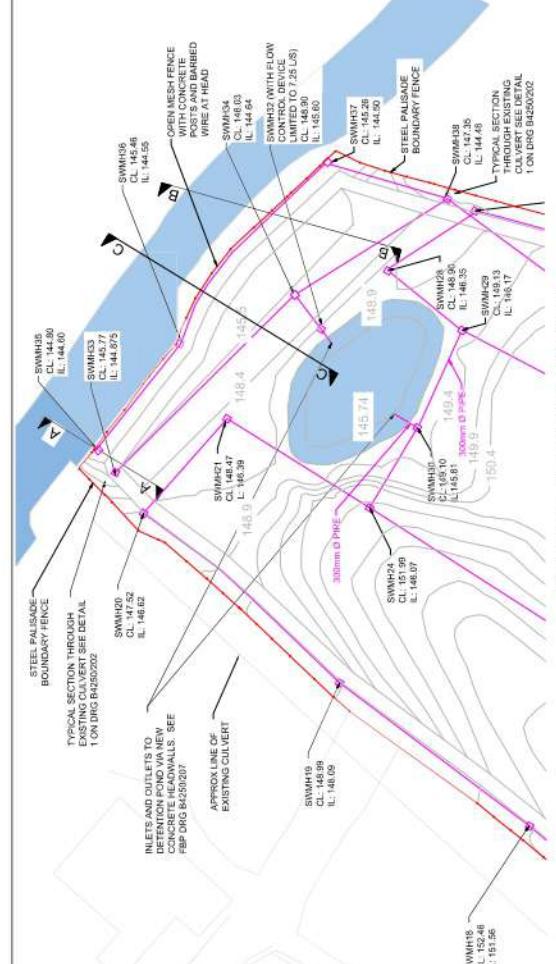
**Attachment A – Additional Cross Sections along Canal Boundary
Providing Details of the Proposed Works in the Area**

GENERAL NOTES:

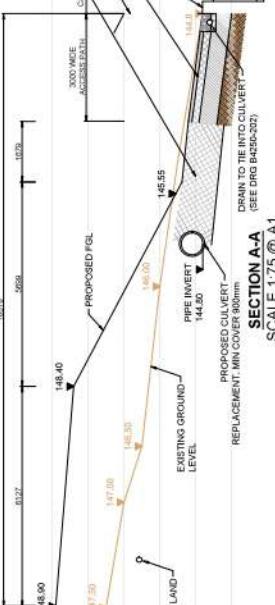


ACCESS PATH TO NORTHERN
BOUNDARY MAKE UP DETAIL
SCALE 1:20 @ A1

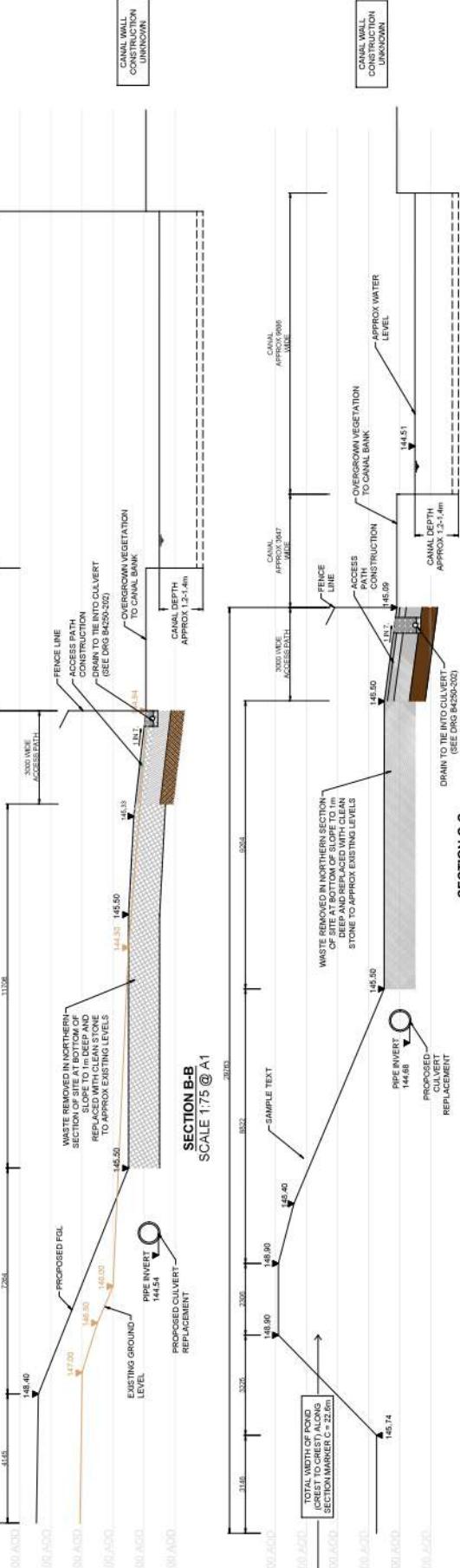
SCALE 1:20 @ A



DETAILED PLAN OF NORTHERN REGION
SCALE 1:500 @ A1



SCALPEL.13@A1



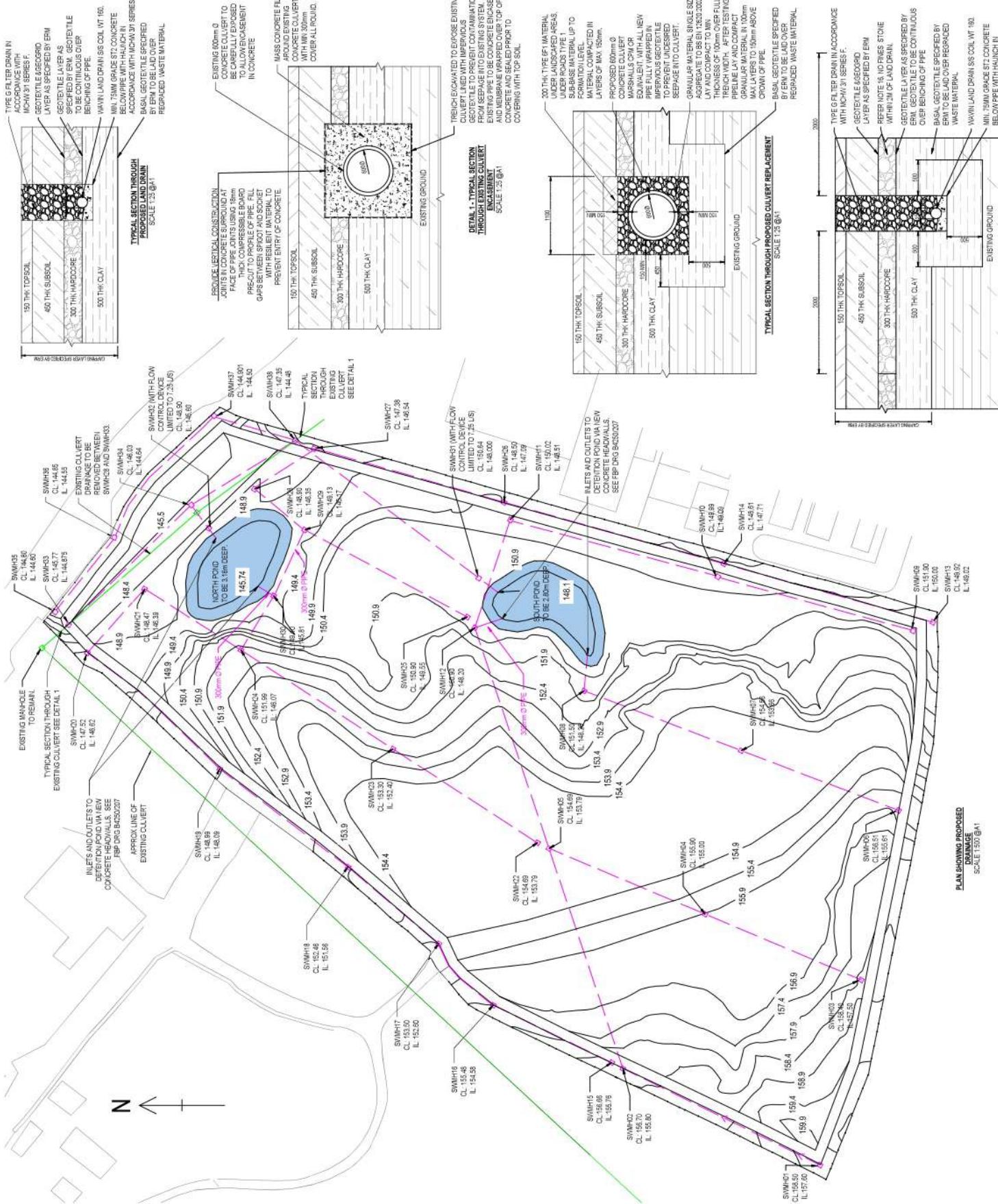
SECTION C-C
SCALE 1:75 @ A1





Attachment B – Schematic of the proposed drainage strategy

GENERAL NOTES:





**Attachment C – Existing Site Contours and Site Boundary/Access Routes
(depicts location of the surface water drain / culvert)**





Attachment D – Proposed Landscape Design

NOTES

Topsoil

Topsoil is deemed to include both imported and existing

undisturbed material

Unless otherwise specified all topsoil for banking, cutting or

levelling may be removed and replaced at a cost of £5880.20/

Grade - Multi purpose. However the following additional

conditions apply:

- Initial stabilisation. Lorry loads are acceptable within

the site boundaries

Sand = 0.45%

Sand = 0.30%

Unless specified elsewhere, topsoil depth will not exceed

400mm in any location.

Subsoil

All subsoil used to backfill within soft landscape areas shall

comply with BS6071/BS6072 Grade: Multi purpose. However the

following additional constraints apply:

- All subsoil must be 30% sand

Timing of soft landscape work

All landscape works to be in accordance with the following

contract specifications:

- December trees and shrubs, late October to late

March.

- Cut and overgrown September/October or

- Sowing April or September

Standards

All landscape works to be in accordance with the following

contract specifications:

- December trees and shrubs, late October to late

- Cut and overgrown September/October or

- Sowing April or September

Planting

Deciduous trees and shrubs, late October to late

March.

- Cut and overgrown September/October or

- Sowing April or September

Designer Notes Under CDM Regs 2015

1. The design information presented on this drawing is prepared with due care and attention to the design outcome. It is the responsibility of the designer to ensure that the design complies with relevant legislation, regulations, codes of practice, standards, codes of practice, and any other applicable requirements.
2. Contractors are responsible for ensuring that the design complies with relevant legislation, regulations, codes of practice, standards, codes of practice, and any other applicable requirements.
3. Where possible, the design has taken due care to eliminate hazards and reduced risks.

SAFETY, HEALTH & ENVIRONMENTAL INFORMATION

- In addition to the hazard/s normally associated with the type of work detailed on this drawing, note the following:
- 1.0. Planting works to be carried near to canal and/or detention basin slopes. Steps, skips, fall, toppling equipment.
 - 2.0. Planting works near residential boundaries. Equipment toppling onto adjacent land.
 - 3.0. Excavation, falls, collisions with statutory undertakers underground facilities. Contractor to provide method statement for undertaking work within service zones and easements.

CONSTRUCTION

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MAINTENANCE

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- 1.0. Planting works to be carried near to canal and/or detention basin slopes. Steps, skips, fall, toppling equipment.
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 - 3.0. Excavation, falls, collisions with statutory undertakers underground facilities. Contractor to provide method statement for undertaking work within service zones and easements.

SCRUB AND TREE PLANTING

- Following planting a ratio of 1 mature diameter around individual plants will be maintained. Seed free by minimum of 2 applications per annum as required. Replanting will take place from November to February during the dormant season. The planting areas will be monitored to detect any encroachment. Where necessary, directly affected areas will be disturbed as required annually to control any weed encroachment, as necessary.

IRRIGATION

- All planting to be watered immediately after planting and as frequently as required during establishment to allow planting to survive.

MAINTENANCE

- The root flare of the newly planted tree should be buried by excess soil or mulch.

PLANTING REQUIREMENTS

- All planting to be watered immediately after planting and as frequently as required during establishment to allow planting to survive.

SOILS

- Soils should be left undisturbed for a minimum of 15 years, to incorporate 150mm of manure and 150mm of topsoil. Any disturbance should be minimised and 150mm of mulch material applied. Any disturbed soil protection area (500mm) should be reinstated with 150mm of topsoil.

SPECIES RICH GRASSLAND

- STIMULUS MIX - Native Scrub Mix. Encourages a mix of grasses and flowers for clay soils. Sown at 4kg/ha.

DETENTION BASIN GRASS MIX

- Hydroseeding seed mix EMT - Special General Purpose Meadow. Hydroseeding seed rate 4kg/m². Fertiliser seed rate 4kg/m².

KEY

- NATIVE SCRUB MIX - Species to be included: 1. No. Crataegus monogyna 15%; 2. No. Crataegus oxyacantha 15%; 3. No. Cornus sanguinea 15%; 4. No. Cornus avellana 15%; 5. No. Cornus sylvestris 15%; 6. No. Salix caprea 15%; 7. No. Salix caprea 15%; 8. No. Salix caprea 15%; 9. No. Salix caprea 15%; 10. No. Salix caprea 15%; 11. No. Salix caprea 15%; 12. No. Salix caprea 15%; 13. No. Salix caprea 15%; 14. No. Salix caprea 15%; 15. No. Salix caprea 15%; 16. No. Salix caprea 15%; 17. No. Salix caprea 15%; 18. No. Salix caprea 15%; 19. No. Salix caprea 15%; 20. No. Salix caprea 15%; 21. No. Salix caprea 15%; 22. No. Salix caprea 15%; 23. No. Salix caprea 15%; 24. No. Salix caprea 15%; 25. No. Salix caprea 15%; 26. No. Salix caprea 15%; 27. No. Salix caprea 15%; 28. No. Salix caprea 15%; 29. No. Salix caprea 15%; 30. No. Salix caprea 15%; 31. No. Salix caprea 15%; 32. No. Salix caprea 15%; 33. No. Salix caprea 15%; 34. No. Salix caprea 15%; 35. No. Salix caprea 15%; 36. 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