Former Fuchs Mill Site, Belper

AVA/2022/0863 – Response to Environment Agency

6th October 2026 Our Ref. 24.116

Following receipt of the EA consultation response (dated: 14th September 2026), Bryan O'Gorman of GEA Ltd, author of the remediation report previously submitted, has reviewed the request for further information from the EA (bold text below) and has provided me with certain commentary to respond to the points identified. The commentary received is as follows –

- **Confirmation of the requirements for, and arrangements relating to, any longer-term groundwater monitoring, maintenance and contingency action following completion of the remediation works.**

  No long-term groundwater monitoring or contingency plan is proposed following completion of the remediation works. The original source of the contamination, associated with the former oil refinery, was removed from the site in the early 2000s, and the residual contamination identified during the subsequent investigations and remediation works has now been successfully removed. The remediation equipment and associated machinery have been removed from site, and the monitoring wells will be decommissioned using bentonite grout. On this basis, no ongoing maintenance or contingency measures are considered necessary following completion of the remediation works.

- **A detailed assessment of the risks to Controlled Waters associated with any proposed infiltration of surface water to ground.**

  There are no proposals for the deliberate discharge or infiltration of surface water to ground. The site has been open for a significant period, during which time any readily soluble contamination would already have been subject to dissolution and migration into groundwater. This process was further enhanced by chemical desorption during the remediation works. Monitoring undertaken during the remediation has demonstrated that dissolved-phase contamination is below the remedial targets previously determined by Delta-Simmons in their DQRA. Notwithstanding that these target levels were determined and agreed with the Environment Agency, to be technically and economically unachievable and a betterment approach agreed.

Furthermore, the proposed landscaping will reduce the area of the site over which infiltration can occur. In the absence of any proposed deliberate discharge of surface water to ground, and given the demonstrated groundwater quality following remediation, a detailed assessment of risks to Controlled Waters associated with surface water infiltration is not considered proportionate.

- **A site-specific assessment of the risks associated with piling or other penetrative works.**

  The proposed development involves the conversion of the existing building and does not require piling or other deep or penetrative foundation solutions. No piling or other significant penetrative groundworks are therefore proposed, and a site-specific assessment of the risks associated with such works is not considered relevant to the proposed development.

It is hoped that the above commentary, will suffice, but should Georgia require further clarification or additional information, I request that I'm copied into communication, but direct communication is sought with Bryan due to the technical nature of the matters outstanding.