Elemental GI Ltd

Our Ref: E23169/RL2

Date: 7th February 2024

BY EMAIL:
Sue Armour
Team Leader Environmental Protection
South Holland District Council
Council Offices
Priory Road
Spalding
PE11 2XE

For the attention of Sue Armour

Dear Sue,

E23169: Response to Online Comments Ref. H01-1118-23 "Land at 66 Barrier Bank Cowbit Spalding PE12 6AQ"

We have recently received a copy of the comments dated 1st February 2024, a copy of which is enclosed.

In response to your comments:

- Ground Gas:
  - We would draw your attention to Section 7.5 of our Phase 2 Report which explains the rationale for the design and installation of 'CS2' measures;
  - In essence our Client recognises that the installation of protection measures which are generally in accordance 'CS2' is not a significant additional step from the basic protection / damp proofing that will install regardless on this scheme, and they also understand that current guidance encourages conservatism where piling is undertaken. They therefore chose to go down this route to exercise a robust and conservative approach, so it is surprising that this has been highlighted when it affords a higher level of protection than usual to both end-users and structures?
- Characterisation of Soils:
  - Exceedances have been recorded in half of the samples taken / tested from made ground. Similarly to the approach re. ground gas, our Client chose to treat all made ground as being similarly contaminated. Remediation in addition to that already being afforded by the increase in site levels has not been recommended as it is noted that this will effectively break all exposure pathways.
  - As an update of significance to the above, we have been told that the final site levels have been confirmed and that >1000mm of 'clean' imported soils shall be present in all private gardens once the development is finalised. This is considered to be more than sufficient to break all feasible exposure pathways.
- Further Characterisation / Remediation:
  - Given the above, further works at this site are not considered necessary as any further contamination would simply necessitate the measures already in place and would therefore be a purely academic exercise and an unnecessary cost to a developer who is already demonstrating high levels of care and conservatism.

- Testing of Imported Soils:
    - Noted with thanks. We will ask our Client to forward all certs. to us for review and then yourselves for approval.

Yours sincerely,

James Regan
Managing Director

Enc. Online Comment – SHDC (Copy)

Online Comment

Application	H01-1118-23
Location	Land at 66 Barrier Bank Cowbit Spalding PE12 6AQ
Proposal	Details of ecological biodiversity measures, contamination of land or pollution of controlled waters and ecological survey (Conditions 3, 5 and 9 of H01-0639-22)

Name	Sue Armour
Address	Team Leader Environmental Protection SHDC
Date Submitted	01-02-24
For/Against	Comments

I have reviewed the Elemental GI Ltd report 'PHASE I GEO-ENVIRONMENTAL ASSESSMENT: LAND NORTH OF BARRIER BANK, COWBIT' ref E23169/1/0 dated Oct 2023 and am in general agreement with the findings. I therefore recommend discharge of part i of condition 5 of H01-0639-22
I have reviewed the Elemental GI Ltd report 'PHASE 2 ENVIRONMENTAL INVESTIGATION: LAND NORTH OF BARRIER BANK, COWBIT' ref E23169/2/0 dated Oct 2023 and am unable to recommend discharge of part ii at this time.
I request clarification on the following points:
- Ground gas monitoring was not recommended, nor completed, yet CS2 ground gas protection measures were proposed. Are they to be installed and if so, why?
- Elevated levels of some determinants were recorded, at over ten times the screening level in one sample, and 8 times in another. Does the consultant consider the site to be adequately characterised? Only four samples were selected for that testing suit and elevated levels (relative to the selected assessment criteria) were identified in two of them.
- Remediation was not recommended as site levels were due to be raised by 600mm. Presumably the consultant is suggesting that the pathways has been broken. However, no comment was made as to the appropriateness or effectiveness of a simple cover system given the elevated levels recorded.
I consider that potentially further characterisation and remediation is required at this location. Any imported soils should be suitable for use and at a concentration level to support a simple cover system, if that is what is proposed.