

Online Comment

Application H09-0867-19
Location Land off: Balmoral Way Holbeach Spalding
Proposal Details of Conditions 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15 and 16 of H09-0706-19)

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Date Submitted 18-03-23
For/Against Comments

Further to the Environmental Protection Team's previous comments I have reviewed the Supplementary Ground Gas Assessment by GeoDyne dated 24 February 2021.

I note that Parts (i) and (ii) of Condition 4 of H09-0706-19 have already been satisfied by the Phase I & II reports by GeoDyne dated July 2015. As a remediation method statement (part (iii) of Condition 4 of H09-0706-19) has not been submitted for this site, the remediation proposals were never agreed prior to development taking place. I understand that the development is now complete.

The Supplementary Ground Gas Assessment by GeoDyne deals solely with the ground gas protection requirements.

GeoDyne have reassessed the original ground gas regime in their 2015 reports using subsequent, more recent guidance. They have also relied on third party verification (documentation from Ashwood Homes and Harlor) to evidence that the mitigation measures have been implemented. The report states that a 2000g dpm (Lingofol 500) membrane was installed in the properties, which is no longer generally accepted. However, they go on to say that 'where well installed and validated it should reduce the potential migration of ground gases from the subfloor void'. The report concludes that no further works or mitigation are necessary at the site with regards to ground gas.

This supplementary report does not meet the verification requirements for gas protection measures as outlined in the technical guidance produced by YALPAG in 2016. For example, there are no plans or photographs, we do not know the competency of the installers or of the Harlor employee who carried out the visual inspection of the membranes. I appreciate that in retrospect it is not easy to evidence the installation process and that GeoDyne have stated that 'no further works or mitigation are necessary', however there are limitations to accepting information obtained from third parties.

Aside from the gas requirements other recommendations were made in the 2015 reports which should also be verified:

Evidence that the elevated soil plateau (comprised of waste materials) that was situated in the central-southern section of the site was removed?

Was an asbestos survey carried out as recommended?

Was any topsoil imported to the site for the garden areas? If so, was it certified as 'clean' and what depths were used?

Was a watching brief carried out on site for previously unidentified contamination?

In the circumstances I recommend that in order to satisfy part (iv) of condition 4 of H09-0706-19 the applicant should provide a verification report for the site. The report should include all of the points mentioned above and refer back to the recommendations made in the earlier 2015 reports.

With regards to verification of the ground gas protection measures, I recommend that the report provides further evidence that the measures have been installed as outlined in the Supplementary Gas Report. I refer you to the YALPAG Verification Requirements for Gas Protection Systems document dated December 2016. I would suggest including photographs of the protection measures during construction, where possible, and as completed. Also, any correspondence from the NHBC, Building Inspectors or Harlor that back up the specification of the protection measures that were installed and the competency of the persons involved in the process.