

Online Comment

Application H16-0692-22
Location Land South East of Littleworth Drove Lucks Bridge PE11 3ED
Proposal Details of scheme to deal with contamination, boundary treatment, means of foul water disposal and storage & disposal of refuse & recycling (Conditions 4, 6, 16 & 19 of H16-0193-19) - re-submission of H16-0254-21

Name Sue Armour
Address Environmental Protection Officer SHDC

Date Submitted 07-09-22
For/Against Comments

I have reviewed the Agricultural & Environmental Business Consultants Report: Desk top study (Phase I) report Location: Land off Lucks Bridge Spalding Common Spalding PE11 3AY Issue 3 dated 20/12/2020 and make the following comments.

I reviewed the report in 2021 and made the following comments:

"I have reviewed the Agricultural and Environmental Business Consultants 'Desk top study (phase 1) report Land of Lucks Bridge Spalding Common Spalding PE11 3AY' dated 20/12/2020 and am unable to recommend discharge of condition 4 of H16-0193-19 at this time.

The report does not present sufficient factual information to support development of a representative conceptual site model. I strongly suggest that any future reports submitted take note of the guidance given in the LCRM, BS10175:2011:A2:2017 and YALPAG 'Development on Land Affected by Contamination Guidance'."

The report does not appear to have been revised for this submission, although further appendices have been provided. On that basis I have reviewed the report and new appendices again, and made some further comments, to assist the applicant as follows: The report notes that the site has only had agricultural use, however the 'garages' have been there for some time, and when I attempted to visit the site in 2021 there looked to be more than just material storage, but more like a long history of abandoned material being left there. Looking at the 2007 air photo the land looks to have been used as a storage depot, with a large area to the east being used for bonfires. No historical mapping was presented and the environmental database report shows a nursery and smithy adjacent.

There was no testing for PAH's and the EPH testing is not appropriate for comparing with human health acceptance criteria, both of which may be associated with use as a former storage yard and bonfire area. The report makes reference to Soil Guideline Values, there are seen as intervention values and their use should be justified in this context.

Further consideration is needed with respect to the lead concentration recorded. Although only just over the C4SL level, it is considerably higher than the background level of lead for the area. The British Geological Survey recorded background levels at around 40mg/kg compared with the 202mg/kg recorded here. Only two aggregate samples were taken, therefore it is not possible to know if this is a hot spot area or part of the general lead profile of the site. As there are no trial pit logs or soil descriptions, (because only surface samples were taken), aggregate sampling was undertaken, and no obvious lead source was identified, I feel that further investigation is required.

I therefore recommend that part I of condition H16-0193-19 be discharged, but consider that a comprehensive site investigation, including some revision of the conceptual model to increase the potential contaminants of concerns, is required to progress this site further.

I would envisage that the site investigation would comprise a number of sampling points, with sampling be either window sampler borehole or machine excavated trial pits suggested. Hand dug pits alone are unlikely to give sufficient information to assess the ground conditions.