Goldfinch ENVIRONMENTAL LTD

PROPOSED RESIDENTIAL DEVELOPMENT PLOT 3 HORSESHOE ROAD SPALDING LINCS

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VERIFICATION REPORT

Report Ref.: 0756/4

Prepared by

D Sargeant

D Sargeant

Date

August 2025

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19 Palmer Street, Walsham Le Willows, Bury St Edmunds, Suffolk, IP31 3BZ.
Tel: 01359 258681

PROPOSED RESIDENTIAL DEVELOPMENT

PLOT 3 HORSESHOE ROAD

SPALDING

LINCS

1. INTRODUCTION

BLM Builders Ltd (the Client) proposes to redevelop a plot of land [known as 'Plot 2', and hereafter referred to as 'The Site'] at the above address to a residential end use.

A site location plan (reproduced from the RMS [Phase 3] report) has been included as Figure 1 towards the back of this Verification Report (VR) to assist the reader.

This VR follows and is associated with a similar document provided for 'Plot 3' [SHDC Planning Ref **H16-0935-20** refers] for the same site as the Developer was validating the site on a 'plot-by-plot' basis as agreed with the LPA. This narrative refers to Plot 3 only. [SHDC Planning Reference **H16-0112-22** refers].

A Phase 2 Investigation report was prepared and issued by this Author, the content of which was subsequently approved by the Local Planning Authority, who also required that the referred Phase 2 investigation be carried out. The Phase 2 report carried out by this Author revealed localised contamination in Plot 3 [lead and one PAH Congener], it was understood from BLM Builders Ltd [the Developer] that formation levels at the site were too 'low' relative to those required for 'flood risk assessment' purposes and also some parts had been further excavated to allow installation of services etc., it was necessary to import soils to achieve the required topographic levels and to provide a suitable growing medium for landscaping purposes and this would also serve to provide the necessary mitigation from the raised determinant concentrations.

It is recommended that this VR is read in conjunction with the previously issued report(s) referred above including the LPA-Approved Remediation Method Statement, dated March 2021.

1.2 Additional Information

At the instruction of the Developer this narrative was prepared for issue to the LPA [inc. Env Health] to demonstrate that BLM Builders Ltd were in compliance with other documents and requirements associated with this Application.

The proposed source for the replacement soils is British Sugar, who have previously provided a chemical laboratory test report representative of the candidate import soils.

This Author has compared the referred test results to the guidance referred above and

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none of the measured concentrations exceed the 'LQM/CIEH S4UL' guidance values and therefore area considered to pose a '*Negligible*' risk to human health when placed in soft landscape and garden areas.

The replacement works would be validated by a combination of collection of delivery documents/invoices, photographs taken during the works and records of depth checks of the replaced soils. The latter would be achieved by placing vertical sections of drainpipe across the garden area to allow measurement to the residual and completed levels.

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2. LIMITATIONS

This Verification Report (VR) is for the sole reliance and use of the Client. Any Third Party coming into possession of this report relies on it at their risk, unless written permission is expressly sought from, and provided by, Goldfinch Environmental Limited. The author owes them no duty of care and skill. Goldfinch Environmental Ltd accepts no responsibility or liability for the consequences of this document being used for purposes other than that for which it was commissioned and the assessments provided herein should not be relied on as a legal opinion.

The findings and opinions expressed are relevant to the time of the site visit and information review and should not be relied upon to represent conditions at substantially later dates. The assessments and opinions given in this report are based upon information available at the time of the report. Where additional information comes available which may affect or identify a need to review our conclusions or assessments we request the opportunity (and reserve the right), to review the information and where warranted, modify our assessment / opinion in part or wholly, accordingly.

This VR does not include any geotechnical considerations pertaining to the site as these were outside the agreed brief.

The recommendations given in this report are based on guidance and best practice in place at the time of issue of the report, the information available at the time of the investigation, the nature of the indicated proposed development and associated end user behaviour patterns. Should any of the foregoing change at any time, then this report should be reviewed in the context of proposed changes.

This report has been based upon the construction details, layout drawings and pattern of occupancy/usage provided by the Client and/or their Agent. Where these details are subject to change either by the commissioning Party (Client), (or a subsequent owner where a site is 'sold-on'), then this report will need to be reviewed and amended accordingly in the light of any such proposed design changes. It is the responsibility of the commissioning Party(-ies) to ensure our Office is provided with this information. It is (reasonably) anticipated that this review would be required by the Planning Authority.

This VR report is for the sole reliance and use of the Client, any Third Party coming into possession of this report relies on it at their own risk, unless written permission is expressly sought from Goldfinch Environmental Limited. The author owes them no duty of care and skill.

The recommendations given in this report are based on the information available at the time of preparation of this VR (mainly the outcome of the Phase 1 and 2 and RMS reports recently approved by the LPA), the nature of the indicated proposed development and associated end user behaviour patterns. Should these proposals change at any time these reports and this RMS should be reviewed accordingly in the context of the proposed change(s).

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3. LEGISLATIVE & REGULATORY SETTING.

The Environmental Protection Act of 1990 created the framework for the identification and remediation of contaminated land. The Act defines “contaminated land” as any land, which appears by the Local Authority to be “in such a condition, by reason of substances, in, on, or under the land that significant harm is being caused or there is significant possibility of such harm being caused, or, pollution of Controlled Waters is being, or is likely to be, caused”.

Land potentially affected by ‘contamination’ is a material consideration for planning purposes together with its relationship with ‘regulatory intervention’ (Part IIa), and ‘voluntary’ investigation (which includes redevelopment of sites which may be affected by contamination). Guidance (LCRM, Environment Agency 2021), provide a generic framework indicating key technical activities applicable in each of these contexts.

The management of land contamination broadly comprises three components, which are identified as ‘Risk assessment’, ‘Options appraisal’ and ‘Implementation’. These, in turn, determine if any *un*acceptable risks exist, ascertain the most appropriate remediation strategy for the site and, finally, demonstrate that the strategy will be effective.

In accordance with this and other current guidance, where a ‘land quality’ risk assessment is required each ‘Relevant Pollutant Linkage’ (RPL, formerly referred to as “source-pathway-receptor” framework), is separately identified and a level of risk attached. This is documented in the form of a ‘Conceptual Model’.

The outcome of the assessment of established, plausible relevant pollutant linkages is used to determine qualitatively the need for further investigation, or remediation with ensuing mitigation of the determined unacceptable risk. (In accordance with the Model Procedures and Regulatory preference, detailed remedial measures should be provided in a separate phase).

The risk assessment takes account of the local environment, end user behaviour patterns, and the nature of the development in relation to proven ‘unacceptable’ risk. This is the approach advocated by current guidance and therefore has been adopted in the assessment of this site.

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4. SITE LOCATION AND DESCRIPTION

The site comprised a subrectangular plot of land on the southern side of the public highway (Horseshoe Road), Spalding, Lincs..

Approximate Grid Reference ^{5}22651, ^{3}21504 refers.

At the time of the site visit there were no notable changes to the proposed development layout for the Plot 3 site.

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5. REMEDIATION RECOMMENDATIONS

5.1 Land Contamination - Soils.

5.1.1 Qualifying Comment

Formation [topographic] levels at the site were too 'low' relative to those required for 'flood risk assessment' purposes and also some parts had been further excavated to allow installation of services etc., therefore it was necessary to import soils to achieve the required topographic levels and to provide a suitable growing medium for landscaping purposes.

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6. INSPECTION.

A visit to the site was made at the stages of

1. Placement of the membrane.

2. Delivery and commencement of backfilling with compliant soils.

3. Completion of soil backfill to obtain depth check measurements.

This information is shown in Plates 1 – 5 inclusive in Appendix 2 towards the back of this VR.

The measurements at each of the Check Points show approximately 650mm of soil has been placed within the remedial areas [in compliance with the RMS] and slightly beyond. Some of the topsoil replacement to the current finished levels was required to comply with FRA requirements.

6.1 Importation of Soils.

This Author can confirm that the affected area(s) has been capped with a cover of clean soils from the approved source (British Sugar), and that the required final topographic levels have been achieved at the site.

The Reader should note that Plates 1a and 1b showing topsoil delivery stockpiles were placed on *previously imported compliant soils*.

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7. VERIFICATION

7.1 Overview

Validation information regarding soil import e.g. the delivery notes have been supplied by the Client and forwarded to the Environmental Engineer (EE). This information has been included in Appendix 1 towards the back of this VR.

It was understood that the soil importation was required across the wider Plot 3 area for this Application area to compensate for 'low-levels' and to comply with FRA Planning requirements.

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8. CONCLUSIONS

BLM Builders Ltd (the Client) proposes to redevelop a plot of land ['Plot 3'] at the above address to a residential end use.

Formation levels at the site were too 'low' relative to those required for 'flood risk assessment' purposes and also some parts had been further excavated to allow installation of services etc., it was necessary to import soils to achieve the required topographic levels and to provide a suitable growing medium for landscaping purposes.

The measurements at each of the Check Points show approximately 650mm of soil has been placed within the remedial areas [in compliance with the RMS] and slightly beyond. Some of the topsoil replacement to the current finished levels was required to comply with FRA requirements.

Taking a risk-based approach as required by the Planning Regime and current guidance, this Author can confirm that as a result of the soil replacement works that have been carried out at the site and verified in this document the required finished topographic levels have now been achieved employing imported soils that are LPA – Approved for use in domestic private gardens. The *residual* risk to human health associated with soils imported into Plot 3 is now considered to be '*Negligible*'.

This VR and its content are subject to the approval of the Regulator, which should be sought as part of the application to discharge the relevant planning condition(s).

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FIGURES

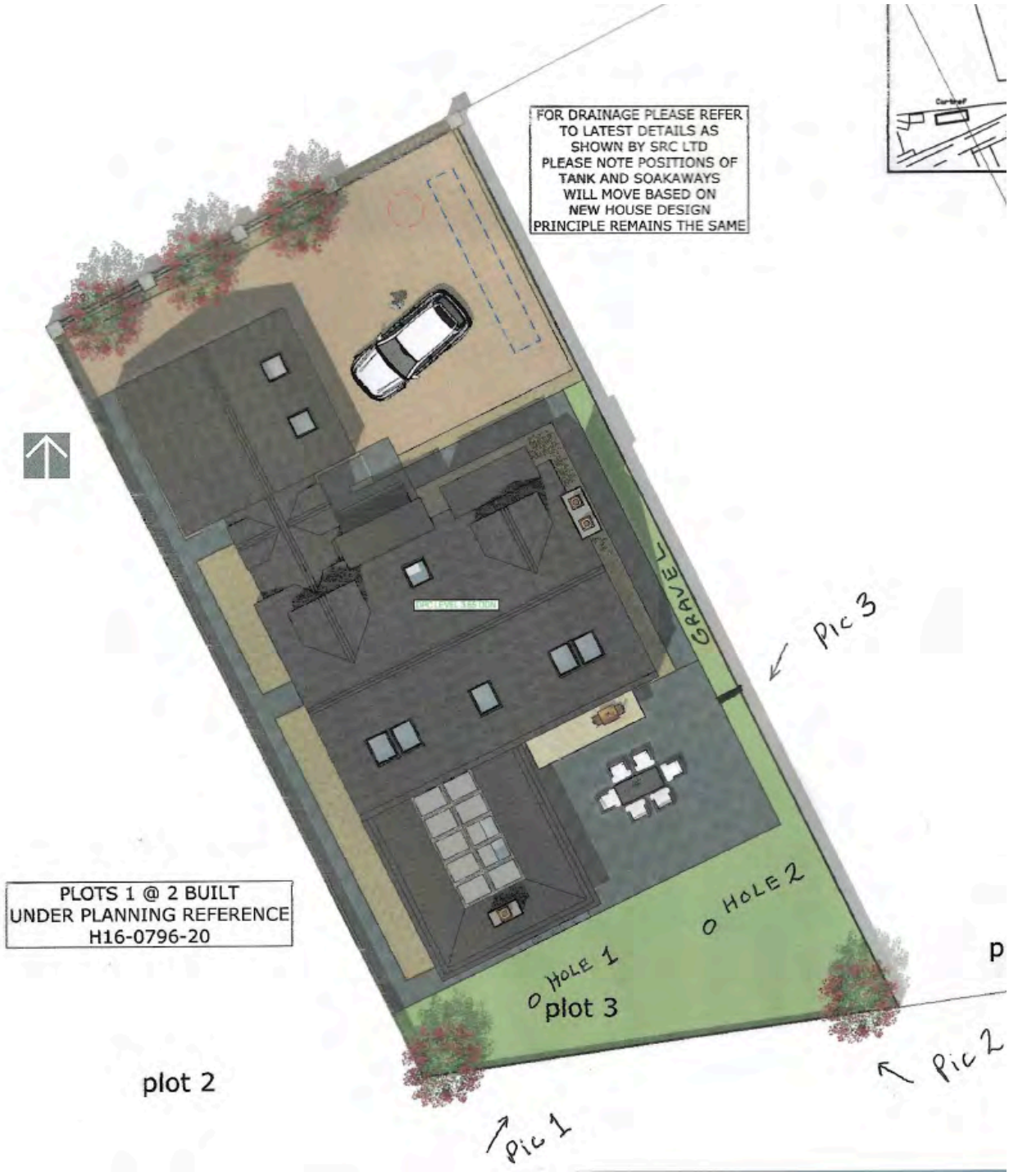


Figure 1	PLOT 3 – Site Location Plan Showing Remedial Area	**Goldfinch** Environmental Ltd
Ref: 0756/4		

APPENDIX 1

Imported Soils [British Sugar]
Documentation [Invoices & Quantites]

CO-PRODUCTS SALES INVOICE

British Sugar plc
1 Samson Place, London Road
Peterborough, PE7 8QJ
Topsoil 0870 2402314
Grower Services 0800 0902376

VAT Registration 289 7298 79

Account No 2060653

BLM BUILDERS LTD
DOUGLAS
HORSESHOE ROAD
SPALDING
PE11 3JA

Invoice Date: 11/08/24
Invoice No: 51437251

CUSTOMER VAT REGISTRATION:

Customer Order No: BLM Builders Sales Order No: 6107409 Product: Landscape 20 28202

Shipment Number	Despatch Date	Actual Haulier	Weight Ticket Number / Vehicle Registraion	Tare Weight	Loaded Weight	Shipped Qty	Price / Load	Value (ex VAT)
41800489	09/08/24	GEOFF HOBBS	55042 AY69RMO	12080	31660	1.0000	560.0000	560.00

Invoice Total (Excl VAT)	560.00
VAT @ 20.00%	112.00
Invoice Total	672.00

PAID WITH THANKS

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APPENDIX 2

Plate 1a & 1b - Topsoil Delivery

Plate 2a & 2b - Depth Check Point 1

Plate 3a & 3b - Depth Check Point 2

Plate 4a & 4b - Membrane Placement

Plate 5a & 5b – Topsoil Replacement Completion



Plate 1a	PLOT 3 Topsoil Delivery	**Goldfinch** Environmental Ltd
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Plate 1b	PLOT 3 Topsoil Delivery	**Goldfinch** Environmental Ltd
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Plate 2a	PLOT 3 Image to Show Depth Check 1 Validation Point	**Goldfinch** Environmental Ltd
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Plate 2b	PLOT 3 Image to Show Depth Check 1 Validation Point	**Goldfinch** Environmental Ltd
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Plate 3a	PLOT 3 Image to Show Depth Check 2 Validation Point	**Goldfinch** Environmental Ltd
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Plate 3b	PLOT 3 Image to Show Depth Check 2 Validation Point	**Goldfinch** Environmental Ltd
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Plate 4a	PLOT 3 Membrane Placement	**Goldfinch** Environmental Ltd
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Plate 4b	PLOT 3 Membrane Placement	**Goldfinch** Environmental Ltd
Ref: 0756/4		





Plate 5a	PLOT 3 Topsoil Completion	**Goldfinch** Environmental Ltd
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Plate 5b	PLOT 3 Topsoil Completion	**Goldfinch** Environmental Ltd
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