Online Comment

Application	H18-0247-20
Location	Off Kenzie Drive Sutton Bridge Spalding PE12 9SW
Proposal	Details of scheme to deal with contamination (Condition 5 of H18-1028-19)

Name	Sue Armour
Address	Environmental Protection Officer SHDC PE11 2XE

Date Submitted	28-09-20
For/Against	Comments

I have reviewed 'Stuart Guy Consulting Report numner 20-01-01 addendum 2 date 31st August 2020 'Analysi and samples of soil from land adjacent to 41Kenzie Drive, Sutton Bridge, Spalding PE12 9SW' and suggest that the consultant sets their work within the current UK framework.
They make no reference to which generic assessment criteria they are comparing the majority of the chemical test results too. This needs to be clarified. If they have not derived their own assessment criteria, using the CLEA model, then there are commercially available sets they can buy.
They make no reference to the C4SL level for lead, which is exceeded at this location by 2 of the 6 samples. They instead refer to withdrawn and superseded SGV levels. They are no longer applicable or useful in the context of this site. Lead is treated differently to other contaminants, and as such derivation of site specific assessment criteria is complex and requires detailed consideration of the implications of raising the minimum risk level by increasing the acceptable blood lead concentration. Looking at the test data, there is no indication that these two samples are outliers, or hotspots. Six samples are not sufficient to undertake statistical analysis, and therefore it must be assumed that these concentrations of lead could be found anywhere within that soil horizon.
Given that the application seeks to raise levels, a simple cover system, rather than further risk assessment, would seem sensible. The report suggest that levels are to be raised by1m across the whole site. This is not the case. I approached the applicant for a section to show rapidly where levels are to be increased, and they have declined to provide it. They have subsequently emailed to say that the ground in the rear gardens will be raised by 300mm, and that were hoping to use soil from the front garden area for this.
I suggest that they discuss their options with their consultant, however I would be open to a BRE simple cover system, once the data have been appropriately assessed. I share their frustration at the lack of progress at this simple site.