

Our Ref: E22108/SSJ/UL2

Date: 13<sup>th</sup> February 2024

**BY EMAIL:**

Jethro Rawling  
East Anglian Civils Ltd  
Suite 1  
Enterprise Way  
Pinchbeck  
Lincolnshire  
PE11 3YR

**For the attention of Jethro Rawling**

Dear Jethro,

**E22108: FURTHER UPDATE CONCERNING ENVIRONMENTAL WORKS AT SITE OFF CHAPELGATE, SUTTON ST. JAMES**

This letter has been prepared following the release of our letter dated 22<sup>nd</sup> January 2024 (Ref. E22108/SSJ/UL1 "E22108: UPDATE AND SUMMARY OF ENVIRONMENTAL WORKS AT SITE OFF CHAPELGATE, SUTTON ST. JAMES") and a response from representatives of South Holland District Council (SHDC) dated 7<sup>th</sup> February 2024 (copy enclosed).

It has been recommended that Elemental GI Ltd prepare a response note for you and your development (Site off Chapelgate, Sutton St. James, hereafter referred to as 'the site') to confirm / clarify the points raised by SHDC in their latest comments.

The various documents which were listed in our last letter have not been reproduced herein and should be referred to in full alongside this report, which must not be read in isolation.

Burial Areas

We discussed the burial areas in our site meeting earlier today. It was discussed that the 'burial areas' were discussed as a possible feature / risk in the 2017 Phase I Report, but that these were thoroughly investigated in the later Geo-Matters Phase II report (2021) and no significant or widespread 'remains' were noted other than small pockets / fragments in 5 No. pits (NB this comprised 1 No. of their own pits and 4 No. pits from a previous investigation). The widespread presence of significant animal remains was therefore not recorded.

We discussed the records from your own enabling works and roads / sewers excavations, which have not encountered any obvious animal remains.

SHDC have said that *"...there are some tasks, such as the removal of burial areas which are not plot specific and therefore actions of that nature would all need to be included in the first batch submitted."* Because no further animal remains have been encountered, and because original soils in the southern areas shall be covered by a significant thickness of 'clean soils' and capping membrane, we would consider that no further actions are warranted at this stage subject to Council and Warranty Provider approval. We would reiterate the advice given in Section 5.1 of the RMS for the site, which states that *"Where further contamination is encountered (or where insufficient capping thicknesses are recorded) then Elemental GI Ltd and SHDC must be notified immediately.."*

### Testing of Topsoil

You have informed us that topsoil from 'Float Fish Farm' has been selected for placement in the gardens of this phase. You've also confirmed that these soils are from a blended / screened source. The YALPAG guidance (v 4.1) requires the following tests for soils from sources like this:

- *"Brownfield/ Screened Soils a minimum of 6 samples or dependent on source and receptor, between 1 per 50m<sup>3</sup> and 1 per 100m<sup>3</sup>. Standard metals/ metalloids (as above), PAH (16 USEPA speciation), TPH (CWG banded), asbestos, pH and SOM (or calculated from TOC). Any additional analysis dependent on the history of the donor site ..."*

We have been informed that c. 600m<sup>3</sup> of these soils will be required across the front / rear gardens and other landscaped areas across this phase. 6 No. samples shall therefore be taken and sent for analysis for the above analytes.

It is recommended that this letter is forwarded to SHDC so that their approval for this methodology can be confirmed and so that they are aware that a letter report detailing the findings of these tests shall be forthcoming.

### Membrane / Soil Materials

During our meeting today we discussed the membrane and the materials noted in SHDC's latest correspondence ('Material A'). The risk of cross-contamination etc. was discussed and it was confirmed that this is not possible as a sacrificial layer of site-won material (from adjacent phase) remains in place beneath the membrane, which is undisturbed following its original deposition. It is also understood that the materials that are temporarily removed from each plot (i.e. to allow the membrane to be installed) are stored nearby on hardstanding (or similar) and that contact with the underlying 'original ground' is not possible at any time. The enclosed sketch diagram should show these steps, and copies of the sketch and of this letter should be forwarded to SHDC so that their approval for this methodology can be confirmed.

Because a sacrificial layer of site-won materials forms a blanket on top of the original ground, and because this shall be subsequently covered with a membrane and then at least 600mm of clean soils, further testing is not considered necessary at this stage subject to Council and Warranty Provider approval.

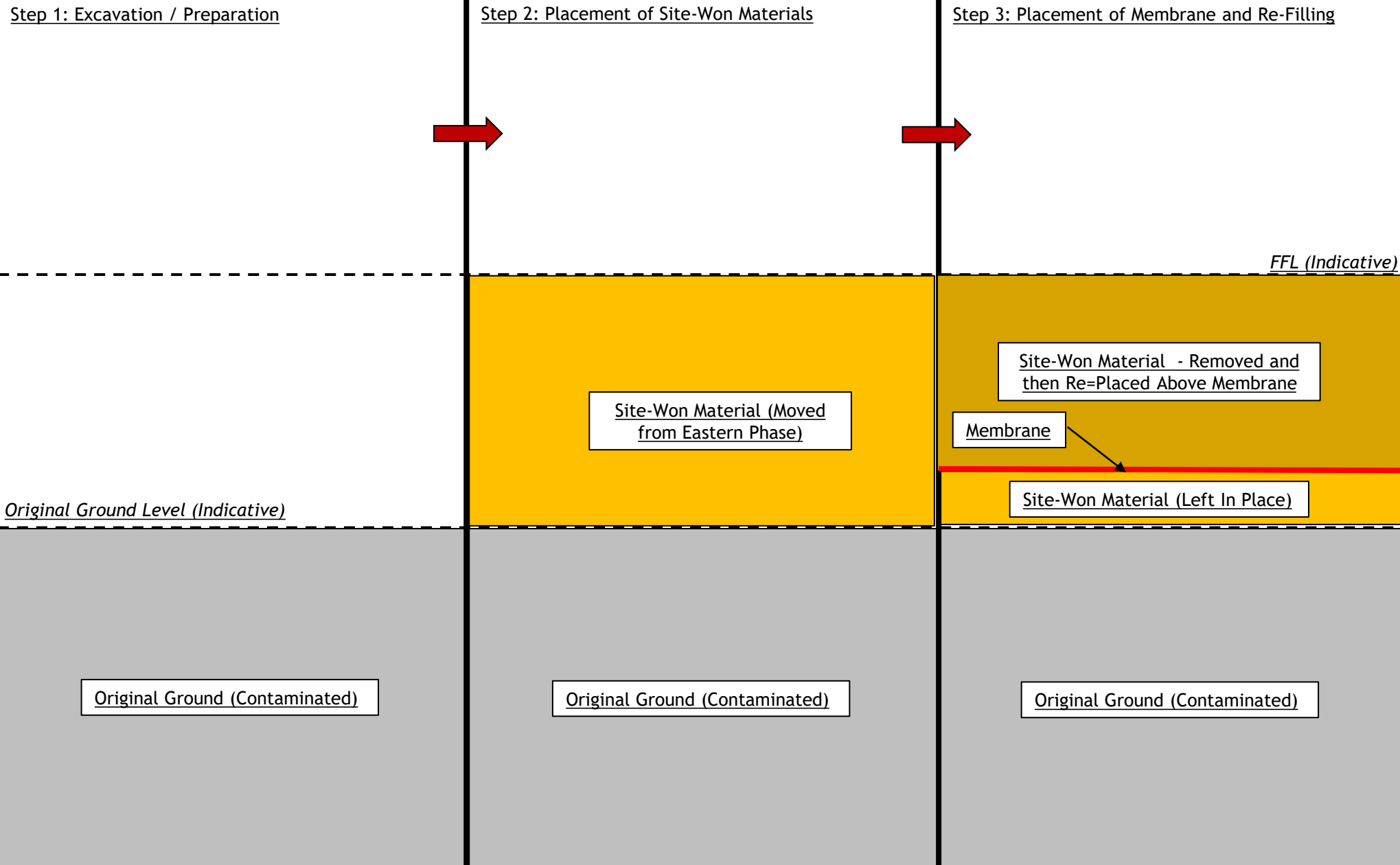
### Capping Inspections

Because the inspection of capping thicknesses (and membrane presence) shall follow a set procedure, the possibility of site staff undertaking these has been discussed. It has been recommended that Engineers from Elemental GI Ltd complete the first capping inspections and that site staff undertake these subsequently by following the steps undertaken by ourselves, subject to Council and Warranty Provider approval.

Yours sincerely,

James Regan  
Managing Director

Enc. 'Sketch of Capping Placement Steps' (Drawing E22108/L05)  
SHDC Comments (07/02/24)



## Online Comment

**Application** H20-0060-24  
**Location** Land adj. Havencombe Chapelgate Sutton St James PE12 0EF  
**Proposal** Details of verification report (Condition 6 of H20-0296-23)

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**Name** Sue Armour  
**Address** Team Leader Environmental Protection SHDC

**Date Submitted** 07-02-24  
**For/Against** Comments

Thank you for your update letter ref. E22108/SSJ/UL1 dated January 2024. I understand that you wish to seek approval for the proposed membrane and release of properties on a plot-by-plot basis. You also summarised what has currently occurred on the site for clarity, which is appreciated.

I make the following comments:

Membrane - no objections to the proposed membrane.

Plot - by plot release - I have no objection to a phased release of properties, however there are some tasks, such as the removal of burial areas which are not plot specific and therefore actions of that nature would all need to be included in the first batch submitted.

I really appreciate the remaining update, particular:

Imported topsoil - sampling rates are either as set out in the RMS or as per the relevant YALPAG guidelines.

Membrane placement - the letter suggests that unsuitable material has been removed from garden areas and clean fill (Material A) placed. This (Material A) will now be removed, the membrane laid and suitable clean fill will be reinstated to finished levels.

I request that any validation report be very clear on the fate of Material A. As this has been laid directly over the unsuitable soils, there is likely to have been cross contamination. If its proposed to use Material A as the suitable clean fill to make up the final levels, any pre-placement sampling and testing would need to give a high degree of confidence in their suitability for use. A similarly high degree of confidence would need to be provided that the material management was adequately supervised, ideally by the independent consultant. I look forward to receipt of the validation reports in due course., but am not in a position to recommend discharge of condition 6 at this time.