

Huckfield, David

From: Panza, Yacklin
Sent: 13 August 2024 15:31
To: Huckfield, David
Cc: Planning @ Eastleigh Borough Council
Subject: [DC/24/97680] Land south of Bursledon Road, Bursledon Road SO31 8EY - Condition 20

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning David,

Thanks for consulting the Pollution Team on planning application reference DC/24/97680 for the discharge of condition 20 (verification of remediation scheme) of F/18/82322 for the development at Land south of Bursledon Road, Bursledon Road SO31 8EY. Apologies on the delay responding to this consultation.

I have reviewed the following documents:

- Hydrock Consultants Ltd. (April 2023). Final Verification Report, reference 08162-HYD-XX-XX-RP-GE-5001.
- Hydrock Consultants Ltd. (December 2018). Remediation Method Statement (RMS), reference BRL-HYD-XX-REM-RP-GE-3000 P1.4.

Please find my comments below:

The approved RMS (December 2018) indicates that the following remedial works were required for the proposed development:

- Demolition of existing structures;
- Excavation, segregation, screening made ground with part-time watching brief;
- Re-use soils in accordance with the materials management plan/ off-site disposal of material (waste consignment / transfer notes);
- Over excavation of service runs and installation of protective pipework in made ground areas (300mm either side and 300mm below edge) in areas where services crossed the former landfill;
- Japanese knotweed remedial works within identified areas;
- Installation and validation of engineered cover system in areas of Public Open Space (POS), play areas and a Country Park comprising hi-vis geomembrane under 300mm clean subsoil under 150mm clean topsoil – sample ratio 1 in 500m3 in POS compared against import and re-use soil criteria). It was agreed that private gardens don't require cover system;
- Installation and validation of gas protection measures for all plots were required, based on CS2 scenario (3.5 points obtained via passively ventilated sub floor voids (1.5-2.5 score) and incorporation of a suitable gas resistant membrane (2 score);
- Discovery strategy for unexpected contamination.

The Verification Report (April 2023) includes a summary of the site background, conceptual site model, materials management strategy and construction environmental management plan. Details of the remedial works are presented in section 6 and 7 of the report, and discussed as follows:

- **Part-time watching brief for excavation, segregation, screening made ground and re-use of soils:**
The report indicated that Hydrock conducted monthly site visits during 2018 and 2021, which included watching briefs, stockpiling inspection, re-use soils and gas membrane inspections. The site visit reports are presented in Appendix I, with a summary in Table 7.1. Based on these reports, it seems that the re-use of soils was undertaken in accordance with the Material Management Plan:

- It is noted that a total of 5,000m³ of imported clean soil from Taylor Wimpey Burridge Green site was used on site and waste transfer notes were presented in Appendix H. Although 372 transfer tickets account for approximately 4,500m³, the evidence is deemed sufficient to verify the quantity of soil received.
 - The Northern bund (near JK1 area) required remediation. Hydrock's site visit and sample collection on 07/10/2020 for the northwest bund confirmed the suitability of the imported topsoil, as laboratory results (report number 20-35360) indicated that none of the 15 samples exceeded the imported soil criteria, thus confirming the success of the remedial works.
 - South bund: Hydrock undertook a site visit and sample collection exercise on 09/10/2019 revealed that 4 out of 21 samples collected contain loose asbestos (SSV03, SSV04 and SSV08). Hydrock concluded that this subsoil stockpile is not suitable for re-use and should be disposed off-site to a suitable facility. However, the Verification Report lacks waste transfer tickets for the removal of this material. Can the applicant provide evidence of its removal?
- **Japanese knotweed remediation:**
Previous remediation works for JK7 area were undertaken by Greenspan Projects Ltd in July 2017, comprising the removal of 950kg of Japanese Knotweed to a disposal facility (Greenspan Projects Ltd after dig report dated 11 for area JK7 presented in Appendix F). Further works to remove Japanese knotweed from the remaining areas were undertaken in accordance with the Knotweed Management Plan produced by Japanese Knotweed Ltd. (reference JKLE14863.1 dated 10/08/2018 - presented in Appendix F). Section 6.1 indicates that all knotweed impacted arisings were placed within the burial cells, with exception of asbestos contaminated soils from area JK4, which was stockpiled and fenced off for disposal off-site. Last bullet point indicates that asbestos contaminated waste remains on site. This asbestos stockpile was observed during several Hydrock site visits until 2019.04.29, when it was noted that the stockpile was no longer present. I couldn't locate waste transfer notes indicating removal of asbestos from site. Can the applicant provide evidence supporting this?
- **Installation and validation of gas protection measures for all plots were required, based on CS2 scenario (minimum of 3.5 points achieved by passively ventilated sub floor voids with a clear void acting as the dispersal layer (2.5 points) and incorporation of a suitable gas resistant membrane (2 points)):**
The report indicates that gas protection measures were installed by NEA Contractors and installation completion certificates presented in Appendix G, as well as gas membrane technical datasheets. Section 7.2 of the report indicates that Hydrock undertook visual inspection of gas protection measures on 132 out of 200 plots. However, visual inspection sheets are only available for plots 60-62, 65-66, and 136-138 in Appendix J. Can the applicant provide supporting information for the remaining inspected plots?
- **Installation and validation of engineered cover system in POS country park area (hi-vis geomembrane under 300mm clean subsoil under 150mm clean topsoil – sample ratio 1 in 500m³ in POS compared against import and re-use soil criteria, haul road with minimum of 150mm topsoil over hi-vis geomembrane):**
- Validation of the Country Park is discussed in section 7.4 of the report. The geo-membrane technical datasheet is shown in Appendix L (Lotrack Alarm18). Country Park area was validated on 13/10/2021 as detailed in the site visit report. The topsoil, subsoil, and membrane were found to comply with cover system specifications in all trial pits within the Country Park area, except for an isolated fragment of asbestos found in CPV01. As no loose fibres were detected at this location, no further action was deemed necessary. The RMS recommended the installation of gas vents within the infill area; however, the Verification Report does not mention this. Can the applicant clarify whether these vents were installed?
 - The RMS indicates that a minimum of 150mm topsoil and permeable membrane was required along the haul road, inspected on 13/10/2021. Validation samples (CPV-12, 13, 14, 15, 16, 33, 34, 35) confirmed compliance with the specifications, with no exceedances above the GAC criteria. The remedial works on the haul road are considered successfully implemented.

- **Over excavation of service runs and installation of protective pipework in made ground areas (300mm either side and 300mm below edge) in areas where services crossed the former landfill:**
The report lacks information on the remedial works for service runs. Could the applicant provide clarification on this matter?
- **Discovery of unexpected contamination:**
A discovery strategy was included in the remediation strategy to address any unexpected contamination encountered during construction. Hydrock was not notified of any such contamination beyond what is discussed above.

In conclusion, the Verification Report is very comprehensive and summarise the remedial works undertaken in the mentioned site. However, in order to fully discharge Condition 20 of F/18/82322, the following information is still required:

- Evidence of asbestos removal from the identified JK4 area and south bund.
- Supporting information or inspection sheets for the remaining plots inspected.
- Clarification on Gas Vent Installation in the Country Park Area
- Information on Remedial Works for Service Runs

I trust the above information is of assistance. If you have any further queries, please do not hesitate in contacting us.

Best regards,

Yacklin

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