

Subject: FW: [DC/25/99785] Cockpit Barn, Knowle Lane, Horton Heath, SO50 7DZ - Contaminated land

Sent: 30 July 2025 13:12

Subject: RE: [DC/25/99785] Cockpit Barn, Knowle Lane, Horton Heath, SO50 7DZ - Contaminated land

Dear Rebecca,

Thanks for consulting the Pollution Team on the application reference DC/25/99785 for the discharge of condition 4 of planning permission reference F/23/94713 (Contaminated Land) for the site known as Cockpit Barn, Knowle Lane, Horton Heath, SO50 7DZ, for Construction of six (6) dwellings, including landscaping, parking and associated works following demolition and site preparation.

I have reviewed the following report:

- Ground and Water (July 2025). Phase II Site Investigation Report. Cockpit Barn, Knowle Lane, Horton Heath, SO50 7DY. Reference: GWPR6594/SIR/July 2025 v1.01

Please see my comments below:

- The site was previously occupied by a poultry house to the east and other structures across the site, with areas dedicated for parking to the north and east. Asbestos, fuel tank and lines, chemical store and former bonfire were noted during previous site walkovers. Historic landfill was reported 700m north to the site. The nearest surface water feature identified was an unnamed stream located approximately 500m north west of the site.
- The preliminary risk assessment indicates moderate risk of made ground, asbestos, fuel leak and spillages from former fuel location. The risk of ground gases was considered low and risk of radon negligible.
- The intrusive site investigation was undertaken in 2 phases. Phase 1 (August 2021) comprising No. 20 trial pits up to 1.80mbgl; and Phase 2 (May 2025) comprising No. 5 trial pits up to 2.0mbgl. The ground conditions encountered were topsoil (up to 0.50mbgl in the central/western area of the site), made ground (up to 1.50mbgl across the eastern area of the site) over sands with various clay proportion from the Wittering Formation, which is classed as Secondary A aquifer. Groundwater was noted only during Phase 1 works between 1.00 to 1.20mbgl.
- A total of No. 23 soil samples were collected for environmental laboratory analysis. Results were screened against CLEA - Residential with homegrown produce scenario 1% SOM.
- Presence of asbestos fibres (in the form of Chrysotile) was encountered at TP9 (0.70mbgl). No asbestos quantification testing was undertaken. Additionally, GAC exceedances of Arsenic, Benzo(a)pyrene, Benzo(b)fluoranthene and Dibenzo(a,h)anthracene were detected at TPA and TP9 between 0.10 and 0.50mbgl. The consultant recommends an asbestos management strategy. It is noted that asbestos management is briefly mentioned on CEMP section 11.0 Demolition; however, a full asbestos management strategy should be produced and submitted to the LPA to demonstrate how the risk of asbestos to human health will be appropriately managed.
- The groundwater risk assessment indicates that given the general absence of groundwater during intrusive investigation, the site underlying Secondary A Aquifer from Wittering Formation, nearest surface water located over 500m from the site, and the low mobility of detected contaminants, it is considered that no unacceptable risk to controlled waters is present. We agree with this approach.
- The ground gas risk assessment relies on the pragmatic approach CLEA Research Bulletin B17. This guidance is typically used as an alternative approach for low-risk sites. I wouldn't agree that the

proposed site is low risk, given the site history, the presence of made ground to variable depths and, historic landfills within the surrounded area. Due to this and the sensitivity of the proposed end use, I would recommend additional ground investigation in terms of ground gas monitoring in accordance with BS8576:2013 is undertaken to demonstrate that the risk of ground gas corresponds to CS1 classification.

- The updated Conceptual Site Model indicates moderate risk from made ground (including asbestos, metals and PAH), and recommended the following remediation strategy:
 - o Removal of soils at hotspots TPA and TP9, validated via sampling and placement of clean soils.
 - o Discovery strategy.
 - o Imported material.
 - o Waste disposal.

Based on the review of the submitted Phase II Site Investigation Report, I am unable to recommend full discharge of Condition 4 at this stage. While the report addresses several contamination risks, including shallow soil contamination and controlled waters, there remain outstanding issues regarding the management of asbestos and ground gas risk. A detailed asbestos management strategy and ground gas monitoring in accordance with BS8576:2013 are required.

In addition, it is important to highlight that Condition 4 includes remediation verification once all mitigation measures have been in place.

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

Best regards,

Yacklin

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