

Fiona Goode

From: Wickens, Tom <tom.wickens@environment-agency.gov.uk>
Sent: 03 December 2020 18:47
To: Fiona Goode
Subject: RE: Woodcroft Farm - MMP and Controlled Waters risks

Hi Fiona,

Many apologies, I realised that not got back to you on this.

Just to confirm I have spoken to Johnathan Driver regarding the potential risk to controlled waters, and the elevated Arsenic and Zinc in the soils at depth in one location. He confirmed that as long as the EA and Portsmouth Water are comfortable that there is no unacceptable risk to controlled waters, he would be happy to.

I have also gone the MMP and have no significant issues with the contents.

If it has not yet been finally issued, I would request a couple of small changes/additions, which hopefully would not cause issues.

- (1) I would request that no potentially impacted soils or other site won material be deposited within a set distance (c10m) of any sinkhole (thought we may have discussed this at some point but could not spot anything in the MMP.
- (2) Just a small change on the form, I should be listed as the GW content instead of Dawn O'Neil.

Kind Regards

Tom

Tom Wickens

Technical Specialist - (Groundwater Quality and Contaminated Land)
Solent and South Downs
Environment Agency

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Fiona Goode

From: Jennings, Vic <victor.jennings@environment-agency.gov.uk>
Sent: 14 October 2020 15:47
To: Fiona Goode
Cc: Wickens, Tom; Parkinson, Matt
Subject: FW: DOWCOP Woodcroft Farm (Phases 2B and 3), Woodcroft Lane, Lovedean, Hampshire, PO8 9QA (Planning ref - APP/13/00804)

Hi Fiona,

Apologies for the delay in replying.

We have a number of issues regarding the use of DoW CoP at historic landfill sites. The general consensus is that the DoW CoP is not suitable for these activities as the material in a landfill is waste and is not clean naturally occurring.

I will have no objections to the use of the DoWCoP provided;

- All requirements stipulated by my colleagues in the GWHCL team (Tom Wickens cc'd) are adhered to,
- All requirements of the DoWCoP are met and
- Any waste excavated from the landfill will need to be assessed and removed from site and sent to an appropriately permitted facility that can accept that waste.

Please let myself or Matt know if you have any questions.

Kind regards,

Vic Jennings Bsc(Hons) MSc(Eng) MCIWM
Senior Environment Officer
EPR Waste – West
Solent & South Downs Area
20 Manners View, Dodnor, Newport, Isle of Wight. PO30 5FA

From: Fiona Goode [<mailto:Fiona.Goode@gesl.net>]
Sent: 06 October 2020 12:34
To: Jennings, Vic <victor.jennings@environment-agency.gov.uk>
Cc: Gavin Roberts <gavin.roberts@gesl.net>; Bethany Fairley <Bethany.Fairley@portsmouthwater.co.uk>; Simon Deacon <Simon.Deacon@portsmouthwater.co.uk>; Wickens, Tom <tom.wickens@environment-agency.gov.uk>; Parkinson, Matt <matt.parkinson@environment-agency.gov.uk>
Subject: RE: DOWCOP Woodcroft Farm (Phases 2B and 3), Woodcroft Lane, Lovedean, Hampshire, PO8 9QA (Planning ref - APP/13/00804)

Hi Vic,

Thank you for your response. In answer to your query the majority of material proposed for reuse on this site are to come from the Made Ground located within the Farmyard area of the site. A number of plots have been identified as requiring a reduced dig prior to the installation of a soil cover system in this area.

It is proposed to raise levels within the former landfill area and install a soil cover system within garden areas in this part of the site. During the excavation of foundations within the former landfill area there may be some surplus materials as a results of these excavations, and it is proposed to reuse these beneath proposed soils cover systems in areas of the site already impacted by contaminants and Made Ground materials. However, the majority of plots within the former

landfill area require a piled foundation solution so it is anticipated that only very minimal volumes of Made Ground material from the former landfill area would be proposed for reuse.

Hope this addresses your query however if you need any further information please come back to me.

Many Thanks,

Fiona Goode

MSc, BSc (Hons), FGS, RSoBRA
Senior Consultant Engineer

From: Jennings, Vic <victor.jennings@environment-agency.gov.uk>

Sent: 06 October 2020 12:21

To: Fiona Goode <Fiona.Goode@gesl.net>

Cc: Gavin Roberts <gavin.roberts@gesl.net>; Bethany Fairley <Bethany.Fairley@portsmouthwater.co.uk>; Simon Deacon <Simon.Deacon@portsmouthwater.co.uk>; Wickens, Tom <tom.wickens@environment-agency.gov.uk>; Parkinson, Matt <matt.parkinson@environment-agency.gov.uk>

Subject: RE: DOWCOP Woodcroft Farm (Phases 2B and 3), Woodcroft Lane, Lovedean, Hampshire, PO8 9QA (Planning ref - APP/13/00804)

Dear Fiona,

Thank you for seeking our opinion on the re-use of material at this development site under the Definition of Waste CL:AIRE Code of Practice (DoWCoP).

Please could you clarify if material from the 'former landfill' is to be included within the DoWCoP submission.

I have copied in my colleague Matt Parkinson to this e-mail as this lies within his Teams area (Waste Central).

Kind regards,

Vic Jennings Bsc(Hons) MSc(Eng) MCIWM
Senior Environment Officer
EPR Waste Team – West
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20 Manners View, Dodnor, Newport, Isle of Wight. PO30 5FA
Tel: 07889448346

From: Wickens, Tom <tom.wickens@environment-agency.gov.uk>

Sent: 02 October 2020 10:40

To: Fiona Goode <Fiona.Goode@gesl.net>

Cc: Gavin Roberts <gavin.roberts@gesl.net>; Simon Deacon <Simon.Deacon@portsmouthwater.co.uk>; Bethany Fairley <Bethany.Fairley@portsmouthwater.co.uk>; Jennings, Vic <victor.jennings@environment-agency.gov.uk>

Subject: [EXTERNAL] RE: DOWCOP Woodcroft Farm (Phases 2B and 3), Woodcroft Lane, Lovedean, Hampshire, PO8 9QA (Planning ref - APP/13/00804)

Hi Fiona,

Apologies for the delay in getting back. I had to take a few day leave, which I needed to extend and have only just been able to get back to work and fully onto our network.

Just to update, I have been discussing some of the issues at this site with Portsmouth Water. They have been going through the documents that you provided and those on the planning portal.

As previously indicated, with respect to protection of the underlying aquifer and associated water supply source, there is no intrinsic reason why this proposal is fundamentally unacceptable. We may however need some additional reassurance with relation to reuse criteria and hotspot discovery protocol, given the exceptional controlled water sensitivity of the location.

From the feedback I have had from Portsmouth Water, I believe that they also feel that there fundamental objection and believe the risks are manageable. They though may also still want to clarify some of the protocol on the reuse.

One other point that I should highlight, is that any discussion would relate solely to the controlled water issues of the uses of this material relating to the location in the inner source protection zone and in the vicinity of karstic features. Rather than the standard reuse issue from a waste perspective. Basically is there any specific controlled water issues with reuse given the groundwater sensitivity of the location rather than are there any fundamental waste issues with reusing this material.

From what I could see the material that you are proposing to reuse are fairly standard (i.e. waste soil /sub soils with a proportion of made ground and some low levels of contaminants, from proposed garden areas).

I do note though that there is an area described as a "former landfill". The information though indicates that this was a very historic old chalk pit, adjacent to the farm, that appear to have been infilled, for reason unknown a sometime ago. Could see no indication that this was actually ever a registered or permitted landfill. The infill material appears to be primarily sandy clay (possibly just reworked local Lambeth Group from the farm site) containing a certain amount of bricks/wood with small quantities of materials such as ashes or plastic. I need to clarify if there may be any general waste issues with reusing this material under [DOWCOP.As](#) I have copied in my colleague Vic Jennings from one of our Waste teams to see if he has any comments.

In term of dates, I am still very much on catch-up so fairly busy next week. I am available though next

Tuesday 6th October, Afternoon.

I am also available on Thursday afternoon and good availability week beginning 12th.

Simon/Bethany would you wish to attend any meeting?

Apologies again in the delay in responding.

Kind Regards

Tom

Tom Wickens

Technical Specialist - (Groundwater Quality and Contaminated Land)
Solent and South Downs
Environment Agency

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Tel - 07867 200775

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It would probably be worth us having an initial talk through some of the above.

Given the issues we work very closely in the area with Portsmouth Waters Groundwater Protection team, and believe that they should be made aware of any proposal. Is it ok to forward this e-mail to one of their groundwater specialist?

After any initial talk through, there may be the need to a telecom with relevant parties, to discuss the ways that risk can be controlled, prior to confirming if we can agree to the reuse proposal.

Kind Regards

Tom

Kin

From: Fiona Goode [<mailto:Fiona.Goode@gesl.net>]

Sent: 01 September 2020 13:45

To: O'Neill, Dawn <dawn.oneill@environment-agency.gov.uk>

Cc: Enquiries, Unit <enquiries@environment-agency.gov.uk>; Parkin, Chris <chris.parkin@environment-agency.gov.uk>

Subject: DOWCOP Woodcroft Farm (Phases 2B and 3), Woodcroft Lane, Lovedean, Hampshire, PO8 9QA (Planning ref - APP/13/00804)

Dear Dawn,

We have previously been in contact with you regarding another site where works were proposed to be undertaken under the Definition of Waste Code of Practice (DOWCOP), as such I hope it is ok to contact you directly in this respect.

We have another site we are working on for Vistry Homes Southern who are developing the following site:

Woodcroft Farm (Phases 2B and 3), Woodcroft Lane, Lovedean, Hampshire, PO8 9QA
Planning Ref: APP/13/00804 (Havant Borough Council).

As part of the works on site the developer proposes to re-use c.558m³ (this figure does not include the required suitably clean materials for the proposed soil cover systems) of materials on the site of origin to include natural soils and Made Ground that is present under the Definition of Waste Code of Practice (DoWCoP) to make up development levels where required and where deemed to be suitable for use. The excavation of the required reduced dig of Made Ground material within specific plots located in the Farmyard area of the site and foundation arising will generate c.312m³. Therefore it is proposed to re-use this excavated Made Ground material within garden areas, beneath the proposed soil cover system within the Farmyard and Chalk pits areas of the site, where impacted materials have already been identified, where plots have also been identified as requiring levels to be raised to achieve final development levels, and remove the need to import material to the site. In addition, Topsoil from across the entire site has been identified as not being impacted by contaminants therefore it is proposed to reuse this site won Topsoil within proposed private gardens areas and proposed areas of soft landscaping to remove the need to import Topsoil material to site. The Made Ground materials have been identified as containing low levels of contaminants (Beryllium, Dibenzo(a,h)anthracene and Asbestos). As such an acceptance of the Remediation Strategy and Verification Plans and agreement in principle for the re-use of materials under the DOWCOP needs to be obtained from the Environment Agency to allow them to proceed under the DOWCOP. As the majority of the site was deemed not to be impacted by contaminants 3 separate RSVP's have been written to address the 3 distinct impacted areas of the site, these have been attached for review. To date no mobile contaminants have been identified as a risk to controlled waters and a discovery strategy will be in place during the site clearance and development works.

It is our understanding that the Local Authority are unlikely to submit the attached document to the EA for consultation through the planning process due the fact that the EA were not consulted/did not provide any comment in relation to contamination on the original application for the site, and the main risks identified relate to human health as opposed to controlled waters and therefore there is likely they have no remit to consult the EA.

In order to comply with the DOWCOP we need the following from the Environment Agency:

- agreement of the RSVP's and
- agreement of the principal to re-use material submit to the MMP and QP declaration

It is my understanding this needs to come from the Waste team and/or the Contaminated Land team, however as the contact centre are not permitted to give our contact details for the teams directly we would ask that if you are not the correct person to contact for this area could you please forward this email to correct person and copy us in for information please or provide us with a contact who we can consult to obtain agreement.

I look forward to hearing from you and if you need any further information please let me know.

Many thanks in advance for your help.

Kind Regards

Fiona

Fiona Goode

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COVID-19 Response

Geo-Environmental Services Limited has been monitoring the developments on coronavirus (COVID-19) and has been putting in place its own mitigation plans. Now that the Government have advised that we have gone beyond the contain phase and into the delay phase, homeworking is now a default and the office will have a skeleton staff who can deal with deliveries, but because of the investment we have made in IT, this will not impact our clients in any way. For the last 10 years we have been gradually improving our IT infrastructure and all staff have the capability to work remotely and can take emails, calls and access files as they would normally. Most of our site work is in areas where there is a low risk of virus transmission and in higher risk areas we have protocols in place to minimise the risk of virus transmission. We are confident that we have the systems and protocols in place to ensure business continuity through these challenging times.

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