

**From:** Tom Gibbons [REDACTED]  
**Sent:** 26 March 2025 09:15  
**To:** Victor Grayson [REDACTED]  
**Subject:** 2024/93605 - Main Avenue  
**Importance:** High

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Good Morning Victor,

As discussed in our meeting please find attached the updated SI Report and Remediation Strategy following the additional investigations on site.

In relation to the comments that we received from Environmental Health please see below comments from Apex:

*(1) The REL report (May 2022, 220322.R.002) fails to fully consider the solvent odour noted in TP07. In addition, neither report (REL nor the Apex Investigation, (August 2024, ref: 1152-GEO-GAR-001)) appear to test for VOCs considering the olfactory evidence of contamination. We expect sampling to be in accordance with good practice guidance.*

*VOC testing was not undertaken during the investigation; however, the Remediation Strategy and Ground Appraisal Report both require that this area be excavated under watching brief by a Geo-environmental Engineer. Clarification has been added to Sections 11.5, 14.3, 14.5 and 19.3 of the Ground Appraisal Report and Sections 3.2 and 4.9 of the Remediation Strategy. This is considered a more appropriate way of dealing with potential contamination in this area, using a PID and soil sampling where contamination is identified during the watching brief to delineate the impacted material and confirm its removal from site. Isolated sampling at SI stage would not necessarily find the source.*

*(2) The ground gas monitoring does not appear to consider peak values or groundwater fluctuations. There seems to be fluctuation concentrations and levels. We would expect comment on this as part of the ground gas risk assessment.*

*Groundwater monitoring data and discussion now added to Section 12.*

*(3) The sampling methodology for the area to the north east is not included in the report but we note the recommendations for additional work. Any investigation in this area must be in accordance with good practice guidance and we expect this investigation to include a suitable suite of testing to include a range of contaminants relevant of the former land-use.*

*Trial pitting in the North East has now been completed and report updated.*

*(4) We acknowledge the information presented regarding the re-use of materials on-site. However, we expect this to form part of a standalone remediation strategy.*

*Remediation Strategy now been updated.*

I hope the above and the attached reports satisfies the points raised and the suggested conditions can be amended to be compliance conditions and not pre-commencements. If you can let me know if that is the case that would be great appreciated.

Have you heard anything from others at the Council in terms of the BNG matter? As we are eager to keep things moving if possible on that.

Kind Regards,

**Tom Gibbons** BA (Hons) MSc MRTPI

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