

Having reviewed the Build Phase Development Remediation and Validation Strategy dated May 2016 (version draft for comment) prepared for Macbryde Homes by Betts Associates I have the following comments to make.

1. I am aware of the past reports prepared by WSP and Listers and note that Betts Associates also carried out some further investigation in 2011 which delineated the arsenic hotspot and concluded no remediation of this area was necessary. However, it appears that works and activities undertaken since then have identified potential contamination concerns that require further assessment. These are:
 - a. The presence of 4 stockpiles on the site (3 of which are believed to be fly-tipped materials).
 - b. Visual and olfactory contamination detailed in section 5.3 of the Betts Associates Geotechnical Report dated March 2016.
2. I note that the substation is now demolished and a previous report had said the ground would require assessment once this work had been done, has this been undertaken?
3. The Betts Associates Geotechnical Report dated March 2016 states in section 4 that remediation has been carried out, however no details of this work have been provided either in this report and other information I have been provided with over the years does not detail what this is either. Further details of this need to be provided.
4. Details of the releveling works should be provided in the context of what material was moved where and whether this will have altered the findings of the previous contamination assessments undertaken. I note that a report was prepared in June 2013 'Earthworks Completion Report' and presume this provides details of the levelling work undertaken and would request that a copy of this report is provided.
5. The previous gas risk assessment by WSP is 10 years old and new authoritative guidance is now available that should be followed, in addition consideration of whether the releveling works has altered the ground gas regime should be provided. I note in section 2 of the Strategy that this matter has been addressed in relation to current radon guidance however the landfill gas risk assessment has not been reviewed in light of recent guidance on this. It should be noted that if landfill gas protection measures are required, and even if they are combined with radon protection measures, then the validation process for this needs to include inspection of membranes installed at each plot to ensure the installation has been satisfactory.
6. Section 3 refers to the need to validate imported soils, it is noted that the soils are for a planting medium and not to provide a clean cover system (at least at this stage, but this is subject to the assessments still required as detailed in these comments). I have provided guidance on

testing of imported soils which should be followed. Should any unforeseen contamination be identified during the development works then this needs to be assessed and documented. The Public Protection team should be notified of this and depending on the assessment findings a solution agreed on how to manage the matter if necessary.

7. Once works to assess the above matters have been undertaken then the Remediation and Validation Strategy should be revised accordingly.