

John Littman  
JCL Partnership Ltd

Our Ref: - RDL00415  
24<sup>TH</sup> March 2020

8 Pride Point Drive  
Pride Park  
Derby  
DE24 8BX

Web: [www.jacksonpl.co.uk](http://www.jacksonpl.co.uk)

Dear John

## **BAKERS QUAY GLOUCESTER DOWNINGS MALHOUSE WORCESTERSHIRE REGULATORY SERVICES 12/2 COMMENTS**

Further to your email outlining Worcestershire Regulatory Services comments in relation to condition 35 please find below a summary of our proposed works which will proceed following removal of the concrete silo and unsafe structures within the existing buildings.

### 1. Site characterisation

Based on the previous exploratory works undertaken either side of the phase 2 building and the basement levels of the existing buildings it is thought that the natural strata is at basement level therefore only a minimal depth of made ground is expected. The depth of the made ground will be investigated using a combination of trial pits and window samples with samples retrieved and both geotechnical and contamination testing undertaken of the underlying made ground and natural strata. The analysis will address natural and manmade contamination and be site specific. It will address issues associated with natural metal enrichment and provide an assessment of the key contaminants identified in CLEA document CLR8 'Potential Contaminants for the Assessment of Land' based on the historical usage of the site. At this stage we envisage the following will be appropriate.

- Standard chemical contamination suites (including speciated PAH & TOC).
- Speciated Total Petroleum Hydrocarbon (TPH CWG) tests
- Asbestos screening tests.

Based on the findings of the visual inspection of the soils during Phase II Exploratory Works, there may be a requirement to carry out additional site-specific testing. The proposed scope of laboratory testing and our assessment of the soil test results will be primarily focussed on potential risks to human health.

### 2. Remediation scheme

If testing through the completion of the phase 2 exploratory works identifies potentially harmful contaminants a remediation scheme will be proposed for approval. As noted above limited depths of made ground are expected and in addition, the site will be entirely encapsulated in a new concrete floor slab therefore eliminating direct contact with the subsoil by end users.

### 3. Implementation of remediation

If a remediation scheme is required, we would suggest that subject to the extent of the works and method of remediation that development of some aspects of the remaining buildings could progress if phasing permits.

### 4. Reporting of unexpected contamination

If required unexpected contamination is encountered during the works the contractor will be obligated to inform the client and engineer. At this time we will submit a further application for approval to include further investigation and testing followed by appropriate risk assessments and remediation strategies as required

Jackson Purdue Lever online at [www.jacksonpl.co.uk](http://www.jacksonpl.co.uk)



under part 4 of condition 35 of the planning consent.

To be clear Phase 2 is entirely within an area of existing buildings where further SI cannot be completed without demolition works due to unsafe structures or inaccessibility. The above sets out our initial proposals for further works which will be reviewed once the building is demolished. It is the client's intention to undertake further SI immediately after the Downings Malthouse has been made safe and demolition of the concrete silo is complete as per the wording of the condition.

Yours sincerely

[Redacted signature]

**Ass. Director**

[Redacted contact information]

John Littman  
JCL Partnership Ltd

8 Pride Point Drive  
Pride Park  
Derby  
DE24 8BX

Our Ref: - RDL00415/DA  
20<sup>TH</sup> May 2020

[REDACTED]  
[REDACTED]  
Web: [www.jacksonpl.co.uk](http://www.jacksonpl.co.uk)

Dear John

**BAKERS QUAY GLOUCESTER DOWNINGS MALTHOUSE WORCESTERSHIRE REGULATORY SERVICES  
12/2 COMMENTS**

Further to my previous letter dated 24/03/20 which set out the strategy for phase 2 of the entire site please find below additional commentary and clarification in terms of Phase 2A (Downings Malthouse, HOS warehouse and kiln).

The initial SI did not reveal any significant contamination across the phase 1 site or within the courtyard to the rear of the cottages. All determinants tested were detected at concentrations below the laboratory LOD or at individual concentrations below relevant Tier 1 SAC. In addition, no hydrocarbons were detected in the courtyard in the location of the former above ground storage tank.

An assessment of the activities within the buildings on Phase 2A does not suggest that the activities would be likely to give rise to contamination and much of the development is within the confines of the existing buildings. Where the concrete silo is currently being removed a watching brief is being undertaken by JPL as part of the demolition works as identified in section 6.22 of the report and it is therefore envisaged that the primary reason for further SI following demolition is for geotechnical purposes as all works relate to construction and refurbishment within the footprint of existing buildings with no external soft landscaped areas.

We are currently proposing a trial pit investigation to confirm the existing foundations followed by drilling boreholes to investigate the deeper natural strata to facilitate a pile design.

As noted above given the historic uses of the site and that the basement levels are suspected to be within the zone of the underlying natural mudstone it is not envisaged that contamination will be encountered however in accordance with industry best practice and for the safety of site workers and future building users we will be undertaking a suite of confirmatory testing in the natural strata and made ground (if encountered).

Assuming the results (at worst) are similar to the phase 1 site it is likely that there will be no specific remediation proposals. If contamination is encountered the phases of investigation, testing and remediation set out in our previous letter will be adhered to.

Yours sincerely

[REDACTED]  
**Ass. Director**