

03 June 2025

30510106-L1

Curo Living Ltd
3-4 New Street
London
EC2M 4TP

By email

For the attention of Mr Gary Dyer

Dear Sirs,

RE: GRAVESEND, THE CHARTER – VERIFICATION PLAN (PLANNING REF: 20200343– Condition 9; Part 4)

Introduction

DTS Raeburn Limited, trading as Igne, were commissioned by Curo Living to prepare a Verification Plan to confirm that the approved Remediation Strategy has been properly implemented and discharge Planning Condition 9(4) of 20200343.

The Remediation Strategy was prepared in in December 2021 by DTS Raeburn (E13343/3-L1) based on the conclusions and recommendations DTS Raeburn Report E13343/1: *'Report on a Ground Investigation for Proposed Residential Development at Bank Street, Gravesend (Eastern Quarter)'* (June 2020).

The Remediation Strategy is reiterated below, together with details of the proposed Verification Plan.

Remediation Strategy

The remediation strategy comprises the inclusion of a minimum 500mm-thickness of suitably clean 'capping' material above any proposed soft landscaped areas. This pathway intervention measure will mitigate the risk of exposure to soils impacted by elevated concentrations of arsenic, lead, PAH compounds and asbestos and ensure that pathway linkages cannot be completed with respect to the long-term health of future site users post-development.

The proposed areas of landscaping are indicated on the drawing included as Appendix 1. It is understood that all other areas of the site will be occupied by buildings or hardstanding at ground level.

It is proposed that the capping materials will comprise clean naturally occurring topsoil/sub-soil. Documentation confirming the source of the material shall be obtained prior to placement.

Compliance testing shall be undertaken at a rate of not less than one sample per 500m³ to verify that the levels of contamination within the imported topsoil/sub-soil are suitable for the proposed use. The test results shall be compared to the assessment criteria included in Appendix 2 of this letter.

A photographic record shall be maintained to verify that a minimum 500mm-thickness of topsoil has been placed across all proposed landscaped areas.



Unforeseen Contamination

Procedures shall be established on site during the construction phase for the assessment and potential remediation of any unforeseen contamination, in the event that this is identified during the course of the works. This shall include the inspection and assessment of any such contamination, together with its appraisal by a suitably qualified environmental specialist. Any proposed action/remediation will be documented and communicated to the Local Planning Authority for approval prior to implementation and/or backfilling of the affected area.

Verification Plan

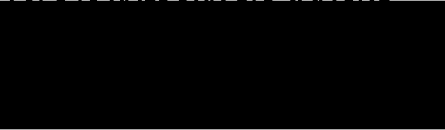
A verification report shall be produced on completion of the remediation works and shall contain the following information:

- Documentation confirming the source of any imported topsoil/subsoil
- Results of laboratory compliance testing of imported topsoil/subsoil, verifying that the levels of contamination are suitable for its intended use
- Photographs confirming the thickness of placed capping materials.
- Details of any unforeseen contamination (if encountered) including its extent, assessment and any remedial measures as approved.

We trust that the above is satisfactory, however, if you have any queries please do not hesitate to contact us.

Yours faithfully,

For DTS RAEBURN LTD t/a IGNE

A large black rectangular box redacting the signature of the Associate Director.

Associate Director

Encl:

Appendix 1 – Drawing produced by Hyland Edgar Driver showing the proposed landscaping arrangement (1 page)

Appendix 2 – Compliance Criteria for Imported Topsoils and Subsoils (2 pages)



APPENDIX 1

Drawing produced by Hyland Edgar Driver showing the proposed landscaping arrangement
(1 page)

1. E01 South

2.Retaining Wall

3.Courtyard

4. S278

5. E03

6. E02

7. Follows 278

North

KEY

Proposed Site Boundary

P1

Hardscape Kellan
Silver grey aggregate PCC paving units with
contrasting tactile paving 600 x 200

P1.1

Hardscape Kellan
Mid grey paving units 200 x 100

P2

Marshalls Model
Permeable PCC flag paving

P3

Clay paving to match existing

P4

Tarmac road surface

P5

Tactile paving

P6

Tarmac Pavement surface

Proposed planting
Groundcover and shrubs

Proposed planting
Lawn

Conservation Kerb 100mm height

Conservation Kerb 50mm height

Kerb edging - flush finish

Metal edging

Proposed planting
Trees

Existing Trees
Retained

Existing Trees
Removed

Retained Tree

Lighting column location

Fire Hydrant location

025m5m10m

1:250

NOTES:

This drawing is the copyright of Hyland Edgar Driver. It must not
be copied or reproduced without written consent. Only figured
dimensions are to be taken from this drawing. All contractors
must visit the site and be responsible for taking and checking all
dimensions related to the works shown on this drawing.

REVISIONS

H | E | D

Hyland Edgar Driver

Landscape Architects and Urban Designers

One Wessex Way, Colden Common, Winchester, Hampshire, SO21 1WG
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PROJECT

THE CHARTER
HORN YARD AND MARKET SQUARE

SUBJECT

General Arrangement Landscape Plan

DATE

21.02.25

DRAWN BY

JSW

SCALE

1:250

CHECKED BY

DP

DRAWING NUMBER

L-1344-HED-ZZ-EX-DR-L-100

REVISION

C3

DRAWING STATUS

F

A - PRELIMINARY

B - ISSUED FOR PLANNING / INFORMATION

C - ISSUED FOR DESIGN

D - ISSUED FOR TENDER

E - ISSUED FOR APPROVAL

F - ISSUED FOR CONSTRUCTION

G - AS BUILT

filename: w:\1344 gravesend\hed\cad\eastern quarter workstages\5general arrangement plans\hed-1344-zz-ex-dr-l-100 landscape general arrangement plan.dwg, printed on:2025-02-21 on iso full bleed at (841.00 x 594.00 mm) @ 100% of original scale



APPENDIX 2

Compliance Criteria for Imported Topsoils and Subsoils (2 pages)

Appendix 2 – Compliance Criteria for Imported Topsoils and Subsoils

The results of laboratory testing of imported subsoils and topsoil to be placed within the upper 500mm of landscaped areas within the proposed development should meet the Compliance Criteria presented in the Table below.

The proposed landscaped areas surrounding the residential development have been classified as a Public Open Space (residential) end use, in accordance with SP1010 – Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination (DEFRA, 2014). Were necessary, a conservative SOM of 1% has been assumed.

The criteria have been selected from the following sources as noted in the final column of the Table.

1. Category 4 Screening Levels (C4SLs), DEFRA (2014)
2. Suitable for Use Levels (S4ULs) published by Land Quality Management Limited (LQM) and the Chartered Institute of Environmental Health (CIEH) (2015)
3. There are no current authoritative assessment criteria for asbestos in soils. However, ICRC Guidance Note 64/85 (1990) 'Asbestos on contaminated sites' states that "concentrations of respirable fibres of asbestos in soil as low as 0.001% by weight may, in loose dry soils, give rise to measurable levels of asbestos if disturbed". The Institute of Environmental Medicine (IOM) (1988) also recommended an Action Level of 0.001%, above which measures should be taken to reduce exposure. The adoption of this Action Level is considered suitably conservative for topsoil beneath landscaped areas, which would normally be expected to retain some natural moisture content.

Determinant	Compliance Criteria (mg/kg)	Source of Criteria
arsenic	79	1
cadmium	220	1
chromium (total)	23	1
copper	12,000	2
lead	630	1
selenium	1,100	2
mercury (inorganic)	120	2
nickel	230	2
zinc	81,000	2
boron	21,000	2
phenol ¹	440	2
PAH		
acenaphthene	15,000	2
acenaphthylene	15,000	2
anthracene	74,000	2
benzo(a)anthracene	29	2
benzo(a)pyrene	5.7	2
benzo(b)fluoranthene	7.1	2
benzo(g,h,i)perylene	640	2
benzo(k)fluoranthene	190	2
chrysene	57	2
dibenzo(a,h)anthracene	0.57	2

fluoranthene	3,100	2
fluorene	9,900	2
indeno(1,2,3-cd)pyrene	82	2
naphthalene	4,900	2
phenanthrene	3,100	2
pyrene	7,400	2
TPH and BTEX		
aliphatic C ₅ -C ₆ ²	304	2
aliphatic C ₆ -C ₈	60,000	2
aliphatic C ₈ -C ₁₀	13,000	2
aliphatic C ₁₀ -C ₁₂	13,000	2
aliphatic C ₁₂ -C ₁₆	13,000	2
aliphatic C ₁₆ -C ₃₅	250,000	2
aliphatic C ₃₅ -C ₄₄	250,000	2
aromatic EC ₅ -EC ₇	56,000	2
aromatic EC ₇ -EC ₈	56,000	2
aromatic EC ₈ -EC ₁₀	5,000	2
aromatic EC ₁₀ -EC ₁₂	5,000	2
aromatic EC ₁₂ -EC ₁₆	5,100	2
aromatic EC ₁₆ -EC ₂₁	3,800	2
aromatic EC ₂₁ -EC ₃₅	3,800	2
aromatic EC ₃₅ -EC ₄₄	3,800	2
benzene	140	1
toluene ²	56,000	2
ethylbenzene ²	24,000	2
m&p-xylene ²	41,000	2
o-xylene ²	41,000	2
asbestos	0.001%	3

¹ Based on a threshold protective of direct skin contact with phenol (most conservative)

² SGV/GAC capped at the lower of the vapour or aqueous saturation limits in soil