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To whom it may concern,

RE: Japanese knotweed – 6022 - Land at the rear of Sturt Avenue, Camelsdale, Haslemere, Guildford GU27 3SB

We have been requested to report on the implications of herbicide treating the vast extent of Japanese knotweed and Himalayan Balsam on the above site.

Within this document we outline; who Environet are and our experience of treating and removing Japanese knotweed and other invasive species. Why we've been asked to create this document. Identify the severity of Japanese knotweed within the outlined development proposal and the implications of leaving the knotweed to continue to grow and consequences of herbicide treating the extensive stands.

Environet

Environet is one of the UK's leading specialist in Japanese knotweed removal from residential and commercial property. Established in 1996, we have a proven track record in safely and efficiently dealing with Japanese knotweed and other invasive species.

Our vision is simply to be "the best" in the Japanese knotweed removal market. That means pin-pointing our customers' needs and fine-tuning our offerings to build on our reputation as "no.1 dependable knotweed professionals who don't let their customers down". Our continued growth and success is thanks to the passion of our highly motivated, knowledgeable and efficient team in delivering solutions with real-value to solve our customers' knotweed problems.

One of the most common obstacles with Japanese knotweed is the apparent need to consign all waste off site to landfill through an approach called Dig & Dump. In 2008 Environet designed and developed the Xtract™ machine enabling us to remove Japanese knotweed

rhizome from infested soil both effectively and economically without the need to consign vast amounts of material off site, thereby saving our clients costs as well as providing an environmentally friendly alternative to Dig & Dump.

The below table outlines the most common approaches to remediating Japanese knotweed and the positive/negative factors to each.

Comparison Table for Knotweed Eradication Methods					
Method	Cost	Time	Track Record	Environmental Impact	Comments
Chemical methods					
In situ herbicide treatment (foliar spray)	★★★★★ Generally least expensive method	★ At least three seasons required, possibly more	★ WARNING Not suitable where ground is to be disturbed	★★★ High impact, risk of harm from herbicide use	Generally used where ground is not to be disturbed and some re-growth is tolerable
In situ herbicide treatment (stem injection)	★★★★★ Generally least expensive method	★ At least three seasons required, possibly more	★ WARNING Not suitable where ground is to be disturbed	★★★ High impact, risk of harm from herbicide use	Generally used where ground is not to be disturbed. Risk of dormancy and future regrowth.
Physical methods					
Xtract™ - on site soil processing	★★★★★ Approx 40% saving compared to Dig & Dump	★★★★★ A matter of just days depending on volumes	★★★★★ High level of certainty	★★★★★ Low impact, no herbicide use, zero waste to landfill	A very cost effective solution suited to development sites
Dig & Dump - landfill disposal	★ Extremely expensive	★★★★★ A matter of just days depending on volumes	★★★★★ High level of certainty	★ High impact. EA method of "last resort"	The method of last resort where soils need to be removed from site
Cell burial – on site disposal	★★★ Approx 50% saving compared to Dig & Dump	★★★ Major earthworks taking weeks or months	★ Control measure, not eradication, reliant on cell membrane	★★★ High impact to site due to earthworks	Not recommended as better options exist. A method we will not employ.
Stockpile & Herbicide Treatment	★★★★★ Generally least expensive physical removal method	★★★ A matter of days to move soils from construction critical areas	★★★ High certainty where excavated but not in stockpile area	★★★ Medium impact from use of herbicides	An economical option but space constraints often make it impractical

Our involvement with the Site

Environet has been involved with the site since July 2015. An initial visible inspection and walkover of the known Japanese knotweed and Himalayan balsam areas was completed by Environet’s Regional Director, Mathew Day. We’ve been herbicide treating the Japanese knotweed between 2016 and 2019 and strimming/treating the Himalayan balsam since 2016.

Since our initial inspection, regular communications have been made between both parties as to the progress of the planning application and any queries raised about Japanese knotweed from involved parties.

Our final visit was completed in July 2022, where it was noted that the our Site Manager, that the biosecurity of the site and in particular that of the knotweed is being breached by the

construction of bike jumps and movement of soil. This had led to a small outbreak of knotweed regrowth, common when disturbance during a treatment programme takes place.

Severity of Japanese knotweed/Himalayan balsam within the Site

Based on our initial findings, found within our email quote dated July 2015, a visible area of approximately 1,000m² of ground coverage from both JK and HB could be seen.

Our knowledge of the plant would predict that the rhizome system is certainly within close proximity of the adjoining properties. It is safe to say that the Japanese knotweed/Himalayan Balsam is one of the main species within the area, either native or non-native.

Implications

Wildlife and Countryside Act 1981

Japanese knotweed is listed in Schedule 9 of the Wildlife and Countryside Act 1981 and is subject to Section 14 of this Act. It is an offence to plant or cause this species to grow in the wild. This means that actions which cause the spread of Japanese knotweed, eg strimming, flailing or dumping contaminated material, may constitute an offence.

There are several implications in leaving the knotweed to continue to grow in-situ or through controlling the plant with herbicide, these include;

Herbicide

It is government policy to keep herbicide use to the lowest possible level whilst weeds such as knotweed are effectively controlled in a way which protects the health of people, plants and creatures and the environment.

The most common chemical used in the war against Japanese knotweed is Glyphosate, found in products such as RoundUp. In recent years several scientific studies have raised concerns above Glyphosate's safety towards people and the environment. Ongoing concerns have meant that the EU restricted the licence period of selling and using Glyphosate to just 5 years (renewed licence in 2018). This has recently been extended by a further 10 years within the EU. The UK decision is due in 2025.

In respect to the subject site, we've been controlling the extent of Japanese knotweed found until development on site commences and the areas can be excavated and removed prior to groundworks taking place. The Himalayan balsam has been controlled through strimming, removing any possibility of the plant creating seeds and dispersing these during late summer. We're currently working through the 'seed bank' contained within the soil.

Biosecurity

Unlawful access to the site as it currently stands allows for members of the public (evidence of children playing) to disturb the invasive species. This could without doubt cause a spread of Japanese knotweed vegetation and possible further establishment. Any damage to the

knotweed vegetation (whether purposeful or not) will increase the spread of rhizome below ground as the plant combats the damage caused above ground.

Loss of biodiversity

Japanese knotweed and Himalayan balsam rapid growth outcompete native species and results in a loss of biodiversity.

Glyphosate along with a mixture of surfactants act by moving the chemical within any targeted plant, killing it within a matter of days or number of months depending on dose rate. All flora or tree within the spray zone will be negatively affected by the high use of chemical over several years in such a densely vegetated area.

The use of large quantities of chemical over a number of years will directly affect invertebrates and micro-organisms within the treatment zones. Higher levels of Glyphosate will be recorded in groundwater and streams through runoff from rainfall.

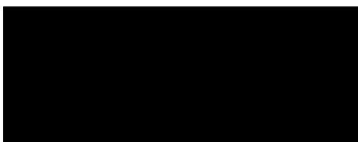
From experience on other less valuable sites it will take years from any plant life to establish itself once a treatment programme has ended. The residual impact of chemical within the soil means the area will be left barren of life. Unwanted plants such as nettles and brambles will be the first to colonise the open soil.

Though the use of mechanical and manual excavation/removal may seem destructive. Mechanical excavation would only be used outside of tree protection zones (manual excavation would take place within these zones). Excavation will be a far quicker process of remediating the knotweed, compared to the long-term approach of herbicide. Therefore, allowing native flora to be re-introduced back into the park and designated pathways constructed to protect the trees and plants in future.

I can't emphasise enough the need for this to be remediated correctly through the use of mechanical excavation and removal off site.

Should any further queries be raised following this document please don't hesitate to contact me directly.

Yours sincerely



Mathew Day
Director
Environet UK Ltd