

PHASE I DESK STUDY AND PHASE II SITE INVESTIGATION REPORT FOR SPRING STREET SAWMILLS, SPRING STREET, RAMSBOTTOM, BURY, BL0 9JQ

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Prepared for

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EXECUTIVE SUMMARY

A Phase I Desk Study Report (which includes a preliminary risk assessment) was required by Bury Metropolitan Borough Council under the National Planning Policy Framework (introduced March 2012), and the Guidance on 'Land contamination risk management (LCRM)' This report is required to support the planning application for the site. Bury Metropolitan Borough Council requires the report to satisfy the National Planning Policy Framework in which it is stated that:

1. "a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
2. "after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990"; and
3. "adequate site investigation information, prepared by a competent person, is available to inform these assessments."

In order to support the planning application for the site, **Warbdale Developments** commissioned **Demeter Environmental Ltd** to undertake a Phase I Desk Study Report (which includes a preliminary risk assessment) at Spring Street Sawmills, Spring Street, Ramsbottom, Bury, BL0 9JQ, to support the planning application for the commercial development of the site.

The report has been completed to fulfil the requirements of a preliminary risk assessment in accordance with and the Guidance on 'Land contamination risk management (LCRM)'. and the documents referred to in Appendix A.

These procedures relate to 'past' contamination, and assume that legislative controls such as Pollution Prevention and Control authorisations control current potentially polluting activities. Emphasis is therefore upon historic site use and how this may affect potential future users of the site should the proposed development plans be realised.

The project has been carried out within the existing legislative framework, which is outlined in Appendix B.



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It should be noted that the table below only offers a brief summary of the information presented in this report and is for briefing purposes only. Reference should be made to the main report for detailed analysis undertaken.

Table 1: Executive Summary

SITE INFORMATION AND SETTING	SUBJECT		DATA
	Client		Warbdale Developments
	Site		Spring Street Sawmills
	Site location		Spring Street Sawmills, Spring Street, Ramsbottom, Bury, BL0 9JQ
	Proposed development		The commercial development of the site
	Planning Reference		N/A
	Grid Reference		378899E 416599N
	Current Land Use		The site extended to an area of approximately 0.13Ha and the site topography was approximately level, however the general topography sloped down to the north. The site comprised of two buildings, the northern being used for storage and the larger southern building was an active workshop/sawmill. The external areas were used for storage associated with the sawmill and vehicle parking
Access		Via Spring Street	
CONCEPTUAL SITE MODEL	History		Initially (1850-1851) the site formed part of a larger parcel of open land, a pond appears to be present on the north eastern area of the site. The 1892 map identifies buildings on the southern area of the site; no evidence of a pond is present. The 1929 map identified additional buildings on the site and the site is identified as a timber yard, by 1954 some of the buildings had been demolished with further redevelopment between 1970 and 1978.
	Geology	Drift	Devensian Till
		Solid	Holcombe Brook Grit (sandstone) on the eastern area with the Millstone Grit Group (mudstone and siltstone).
	Radon		Less than 1% of properties are above the action level. No radon protective measures are required.
	Hydrology		A waterbody is present on the northern boundary of the site, which is a moderate sensitivity water body. There are a further 5 water bodies within 250m all of which are moderate sensitivity water bodies.
	Hydrogeology	Drift	The drift is regarded as a very low sensitivity aquifer
		Solid	The solid is regarded as a low sensitivity aquifer
	Previous Site Investigation		N/A
	Potential Sources of Contamination		Made Ground Sawmill / workshop / past land uses
	Potential Contaminants of Concern		Wide range of contaminants in the made ground VOC's SVOC's
Potential Receptors		Human beings (construction workers) Human beings (future worker occupants) Human beings (trespassers / transient users) Human beings (worker occupants of adjacent properties) Human beings (residents of adjacent properties) Property in the form of buildings (on site) Potable water mains (on site) Surface water bodies	
This sheet is intended as a summary of the report; it does not provide a definitive analysis and should not be treated as an independent document.			



1.0 INTRODUCTION

1.1 Desk Study Terms of Reference

1.1.1 This report presents the results of a Phase I Desk Study carried out within the grounds of ***Spring Street Sawmills, Spring Street, Ramsbottom, Bury, BL0 9JQ***, performed for ***Warbdale Developments***. This report was written in February and March 2022 and updated in October 2025 (proposed development changed from residential to commercial) and December 2025 (updated walkover survey) and should be read in the light of any subsequent changes in legislation, statutory requirements or industry practices.

1.1.2 The works were carried out in accordance with the standard terms of contract of ***Demeter Environmental Ltd.***

1.1.3 The aim of the report is to support the planning application for the site.

1.1.4 This report has been prepared in accordance to the Demeter Environmental Limited Quality Management System.

1.2 Aims and Objectives of Desk Study

1.2.1 The objectives of the desk study are as follows:

- To provide information on past and current uses of the site and surrounding area and the nature of any hazards and physical constraints;
- To determine the risks associated with hazardous ground gas, including radon;
- To identify current and likely future receptors, potential sources of contamination and likely pathways and any features of immediate concern, including those that could be introduced in the future;
- To identify any aspect of the site requiring immediate attention (e.g., insecure fences, hazardous substances accessible to trespassers or likely to be dispersed by water or wind);
- To provide information on the geology, geochemistry, soil, hydrogeology and hydrology of the site;
- To identify potentially different sub-areas (zones) of a site, based on differing ground conditions; potential contamination; and past, present and future uses;
- To provide information for the preliminary risk assessment;



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- To provide data to assist in the design of potential subsequent exploratory and main investigations and to give an early indication of possible remedial requirements;
- To provide information relevant to worker health and safety and to the protection of the environment during field investigations;
- To provide data to assist in the design of potential subsequent investigations and to give early indication of possible remedial requirements;
- To identify the need to involve regulatory bodies prior to intrusive investigation.

1.2.2 The primary objective of the desk study is to identify potential environmental issues that may represent a constraint to the proposed redevelopment of the site. The findings of this assessment can be used to determine, if required, the scope of a follow on Phase II intrusive site investigation.

1.2.3 The desk top study provides an initial view in respect of the status of the site with regard to:

- The potential impact on the site of interest from surrounding land uses and other environmental factors;
- Potential contamination of the site strata by historical and or current use;
- The potential impact on the wider environment by historical and or current use of the site of interest;
- Potential problems associated with geological features such as faulting, mineral extraction, mining and land instability;
- The location of above-surface features that may affect the proposed redevelopment.

1.2.4 This study includes a review of the available geological, historical and environmental information in order to establish the likely ground conditions at the site. The review is based on the following information:

- Align any report to the requirements of relevant guidance;
- To assess historical activities, referring to past Ordnance Survey maps, at the site with respect to their potential impact on the site environment;



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- To characterise the environmental setting of the site, identify migration pathways and vulnerable receptors for contamination originating at the site, focusing on potential soil and groundwater liabilities;
- To assess historical and current surrounding land use, referring to past Ordnance Survey maps, in relation to known or potential off-site contamination issues that may impact the subject property;
- To identify likely ground conditions at the site and the potential geotechnical and environmental constraints to development;
- To establish development abnormals prior to site development;
- Assessment of the potential risks to both on and off site receptors;
- To develop a preliminary conceptual model.

1.2.5 The data collated in this study has been undertaken to allow the construction of a preliminary conceptual model, which represents the potential contaminant linkages that have been identified on the site. This is used as a basis to develop a strategy for an intrusive investigation where required.

1.3 Scope of Desk Study

1.3.1 The scope of work for this report comprises of the following:

- Procurement of Groundsure Enviro+Geo Insight Report;
- Procurement of Ordnance Survey maps;
- Review of published geology;
- Review of data available in the public domain (borehole section sheets etc.);
- Review of planning history and any associated documents using information in the public domain;
- Site walkover survey;
- Preparation of a preliminary risk assessment.



1.4 Proposed Development

- 1.4.1 It is proposed that three industrial units are erected on the site. The drawings are presented in Appendix E.

1.5 Basis of Risk Assessment

- 1.5.1 This assessment has been undertaken with due regard to the Environmental Protection Act 1990, associated statutory guidance (NPPF, PAN 33 etc.), 'Guidance for the Safe Development of Housing on Land Affected by Contamination', the Guidance on 'Land contamination risk management (LCRM)', the Contaminated Land Guidance Documents issued by the Environment Agency and the documents referred to in Appendix A. The methods used follow a risk based approach with the potential risk assessed using the 'Source – pathway – receptor contaminant linkage concept introduced by the Environmental Protection Act.

1.6 Limitations and Exceptions of this Report

- 1.6.1 This report was undertaken for **Warbdale Developments** at the request of **PPY Design Ltd** and as such should not be entrusted to any third party without written permission of **Demeter Environmental Ltd**.
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- 1.6.5 The findings and opinions provided in this document are made in good faith and are based on data provided by third parties (Groundsure, Environment Agency, The Coal Authority, and Regulatory Bodies) and the report should be read in conjunction with the limitations on the document control form. The accuracy of map extracts cannot be guaranteed and it should be



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recognised that different conditions on /adjacent to the site may have existed between and subsequent to the various map surveys.

- 1.6.6 This report is prepared and written in the context of the purposes stated above and should not be used in a different context. Furthermore, new information, improved practices and legislation may necessitate an alteration to this report in whole or in part after its submission. Therefore with any change in circumstances or after the expiry of one year from the date of this Report, the report should be referred to **Demeter Environmental Ltd** for reappraisal.
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- 1.6.8 **Demeter Environmental Ltd** makes no representation whatsoever concerning the legal significance of its findings or to other legal matters referred to in the following report.
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- 1.6.10 The report should be read in its entirety, including all associated drawings and appendices. **Demeter Environmental Ltd** cannot be held responsible for any misinterpretations arising from the use of extracts that are taken out of context.
- 1.6.11 This report does not comprise a geotechnical assessment of the strata underlying the site.
- 1.6.12 Any borehole data from the British Geological Survey sources is included on the following basis: 'The British Geological Survey accept no responsibility for omissions or misinterpretations of the data from their Data Bank as this may be old or obtained from non-BGS sources and may not represent current interpretation'.
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- 1.6.15 Any risks identified in a Phase I Desk Study Report are perceived risks. Actual risks can only be assessed following a physical investigation of the site. **Warbdale Developments** should be aware that this report is based on information available at the time. Where a site investigation has been undertaken, the ground conditions can only be defined precisely at the exploratory positions, whilst at intermediate positions they can only be inferred. It is possible that factors may vary due to seasonal effects or other climatic effects, and may at times differ from those measured during the investigation. While every attempt is made to assess the likelihood and extent of such variations, conditions may nevertheless exist which are undisclosed by this investigation.
- 1.6.16 The findings of this report are based on finite information obtained from research and consultations. Demeter Environmental Ltd cannot guarantee the reliability of all such information and the searches should not be considered exhaustive. The findings of the report may need to be reviewed as any future exploratory investigations progress and in the event that additional archive information becomes available.
- 1.6.17 Notwithstanding the findings of this study (and any subsequent investigations), if any indication of contaminated soil (visual or olfactory) is encountered at any stage of the development further investigation may be required.
- 1.6.18 Arboricultural Survey and advice on arboricultural issues are considered to be outside the scope of this report except for their effect on the foundations to the proposed buildings. Where identification of any species is made, especially invasive plants such as Japanese Knotweed, Himalayan Balsam or Giant Hogweed, this should only be considered as a preliminary assessment and subject to confirmation by a professional Arboriculturist. Demeter Environmental Ltd takes no responsibility for failing to identify, or the incorrect identification of, any tree or plant species on site.
- 1.6.19 Our investigations exclude surveys to identify the presence of injurious and invasive weeds. Under the Weeds Act 1959, the Secretary of State may serve an enforcement notice on the occupier of land on which injurious weeds are growing, requiring the occupier to take action to prevent the spread of injurious weeds. The Weeds Act specifies five Injurious weeds: Common Ragwort, Spear Thistle, Creeping Field Thistle, Broad-leaved Dock and Curled Dock. The Wildlife and Countryside Act 1981 provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under section 14(2) of the act to 'plant or otherwise cause to grow in the wild' any plants listed in schedule 9, part II. The only flowering plants currently listed are Japanese Knotweed and Giant Knotweed. The presence of such weeds on site may have considerable effects on the cost / timescale in developing the site.



- 1.6.20 Good guidance on injurious and invasive weeds is provided on DEFRA and Environment Agency web sites.
- 1.6.21 Our investigations exclude surveys to identify the presence or indeed absence of asbestos in buildings/infrastructure on site. If asbestos is suspected to be present, we recommend specialists in the identification and control / disposal of asbestos are appointed prior to commencement of any works on site or, if appropriate, purchase of the site. The presence of asbestos on site may have considerable effects on the cost / timescale in developing the site. There is good guidance in relation to Asbestos available on the Health and Safety Executive (HSE) web site.
- 1.6.22 The scope of this investigation does not include an assessment for the presence of asbestos containing materials within or below the buildings or in associated infrastructure in the ground at the site. Should there be a requirement under Regulation 4 of the Control of Asbestos at Work Regulations 2002 for any part of the site to be deemed 'non-domestic premises' the duty holders should prepare an asbestos risk management plan and this may require technical survey works as described in the HSE Guidance HSG264 (2nd edition).
- 1.6.23 The Health and Safety at Work Act requires that Employers provide safe places of work for their employees. The Control of Asbestos at Work Regulations (CAWR) place very heavy specific duties on those who commission and carry out work on asbestos containing materials. Construction work that is likely to involve exposure of workers to hazards associated with asbestos in existing buildings will be subject to the Construction (Design and Management) Regulations which impose duties upon Clients, Designers and the Contractors carrying out the work. Other health and safety and welfare regulations place duties on Employers to undertake risk assessments and prepare hazard management plans which, in the case of a building likely to contain asbestos, could involve the commissioning of surveys, hazardous materials location registers and proposals for remedial work.
- 1.6.24 Whilst a site walkover has been undertaken as part of this report, the survey does not constitute either an asbestos or structural survey and all areas of the site may not have been visited / inspected.
- 1.6.25 Consideration of occupational health and safety issues are beyond the scope of this report.
- 1.6.26 All assessments and recommendations should be forwarded to the relevant planning authorities for comment and approval prior to implementation.



1.7 Principal Sources of Information

- 1.7.1 Documents that were available or have been obtained for reference or obtaining data are given in Appendix A. Further information on data used in this report and dates the data was obtained/accessed is given below:



Table 2: Summary of Information Obtained

Source	Data Provided	Date Obtained
Groundsure	Ordnance Survey Maps Groundsure Enviro+Geo Report	27th February 2022
Bury Council	Planning history	28 th February 2022
British Geological Survey	1:50,000 Geological Maps 1:10,000 Geological maps Borehole Section sheets	28 th February 2022
Environment Agency	Historic Landfill Data (last updated 5 th April 2016) Authorised Landfills (5 th April 2016)	28 th February 2022
MAGIC Database	Nitrate Vulnerable Zones Aquifer Details Groundwater vulnerability Water Safeguard Zones Groundwater Source Protection Zone	28 th February 2022
Coal Authority	Interactive Map Viewer Coalfield Plans	28 th February 2022
Google Earth®	Aerial plates	28 th February 2022
Google Streetview®	Street level imagery	28 th February 2022

2 SITE CONTEXT

2.1 Site Location

2.1.1 The site is located off Spring Street, the approximate grid reference is 378899E 416599N, as shown on Drawing 1 and Plate 2 in Appendix D.

2.1.2 The site is located within the administrative jurisdiction of Bury Metropolitan Borough Council.

2.2 Site Description & Site Reconnaissance Visit

2.2.1 The aims of the walkover were to determine whether there were any obvious potential sources of contamination, pathways and receptors on or near the site and whether there were any obvious geotechnical difficulties with the site. In addition, access routes into the site were investigated in order to establish the feasibility of further site investigation.

2.2.2 A site walkover survey was undertaken in March 2022 and December 2025 by a consultant from Demeter Environmental Ltd, in general accordance with CLEA CLR 2, on completion of a review of relevant historical and environmental data. The observations of the walkover are presented hereunder:



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Table 3: Summary of Walkover Survey – March 2022

Topic		Discussion
Site Description / Use		The site extended to an area of approximately 0.13Ha and the site topography was approximately level, however the general topography sloped down to the north. The site comprised of two buildings, the northern being used for storage and the larger southern building was an active workshop/sawmill. The external areas were used for storage associated with the sawmill and vehicle parking. The garage adjacent to the site entrance was noted. No visual or olfactory evidence of contamination was noted during the walkover survey. Plates 1 to 12 are from the March 2022 survey
Description of surrounding area		Residential
Surrounding Land Uses	North	Residential
	East	Residential
	South	Residential
	West	Residential
Access		Via Spring Street
Structures		Two buildings were present, the storage building on the north eastern area and the workshop along the southern boundary.
Surfacing		The external areas were covered by asphalt with rough landscaped areas along the site boundaries. Hard-standing was present within the buildings.
Made Ground		Given it appears that the site has been levelled it is likely that made ground will be present under the site.
Storage Tanks		No evidence of either historical or current underground or aboveground storage tanks was noted at the site.
Raw Material and Chemical Use and Storage		No evidence of significant raw material or chemical use or storage was observed at the site.
Solid Wastes		No significant observations were made of solid waste storage at the site.
Hazardous and Industrial Wastes		No evidence of significant hazardous and industrial waste storage was observed at the site.
Air Emissions		No significant sources of air emissions were observed at the site.
Asbestos Containing Materials		It is likely that due to the age of the building structures that some possible asbestos containing materials are located within the building fabric across the site. A full asbestos survey should be undertaken before any demolition is undertaken at the site. The made ground identified on the site may be impacted by asbestos as the source of the material is unknown. It should be noted that we are not qualified asbestos surveyors and as such cannot guarantee the presence or absence of ACM's.
Spills and Releases		No evidence of any spills or releases of substances which may contain potentially polluting materials was noted at the site.



Table 4: Summary of Walkover Survey – December 2025

Topic		Discussion
Site Description / Use		The site extended to an area of approximately 0.13Ha and the site topography was approximately level, however the general topography sloped down to the north. The site comprised of an open parcel of land. The site was surfaced with gravel, asphalt and exposed site soils. Two shipping containers were present on the northern area of the site. A concrete retaining wall with a timber fence above was present along the southern and western boundaries of the site. Gabion baskets had been installed on the northern boundary of the site acting as a retaining wall with a timber fence along the top of the retaining wall. Some building materials such as bricks, slates and timber were present on the site, The garage adjacent to the site entrance was still present. No visual or olfactory evidence of contamination was noted during the walkover survey. There were no changes to the site since the site investigation of November 2024.
Description of surrounding area		Residential
Surrounding Land Uses	North	Residential
	East	Residential
	South	Residential
	West	Residential
Access		Via Spring Street
Structures		Other than perimeter retaining walls and fencing, no structures were present on the site.
Surfacing		The site was surfaced with gravel, asphalt and exposed site soils.
Made Ground		Made ground in the form of asphalt and gravel was present on the site.
Storage Tanks		No evidence of either historical or current underground or aboveground storage tanks was noted at the site.
Raw Material and Chemical Use and Storage		No evidence of significant raw material or chemical use or storage was observed at the site.
Solid Wastes		No significant observations were made of solid waste storage at the site.
Hazardous and Industrial Wastes		No evidence of significant hazardous and industrial waste storage was observed at the site.
Air Emissions		No significant sources of air emissions were observed at the site.
Asbestos Containing Materials		No evidence of asbestos was noted during the December 2025 walkover survey. It should be noted that we are not qualified asbestos surveyors and as such cannot guarantee the presence or absence of ACM's.
Spills and Releases		No evidence of any spills or releases of substances which may contain potentially polluting materials was noted at the site.

2.2.3 A plan of the site in its current configuration is presented on Drawing 3 in Appendix D. Potentially contaminative features identified during the walkover survey are presented on Drawing 4.

2.2.4 Photographs of the site and a photograph key plan are presented in Appendix F.



3 SITE HISTORY

3.1 Historical O.S. Maps, Aerial Plates and Street View Images

3.1.1 The historical usage of both the site and the surrounds has been researched by reference to historical maps and aerial plates presented in Appendix F (O.S. maps, Old Maps Online, and National Library of Scotland), street plans, street directories, historical aerial photographs (Google Earth, Britain From Above, historical street level imagery and plates in the public domain.) are summarised hereunder in Table 4.

Table 5: Summary of Review of Historical Maps and Aerial Plates

Area	Summary of Historical Review
Site	Initially (1850-1851) the site formed part of a larger parcel of open land, a pond appears to be present on the north eastern area of the site. The 1892 map identifies buildings on the southern area of the site, no evidence of a pond is present. The 1929 map identified additional buildings on the site and the site is identified as a timber yard, by 1954 some of the buildings had been demolished with further redevelopment between 1970 and 1978. No further significant changes could be discerned.
Area adjacent to the site	Initially the site boundaries were formed by open land on all sides with a river/pond forming the northern boundary, by 1891 the eastern and southern boundaries were formed by dwellings. By 1929 a dwelling was present on the north eastern boundary of the site. The 1978 map identifies buildings on the western boundary of the site, the 2000 aerial plates identify dwellings on the remainder of the northern boundary. The 2022 map identifies a garage on the western boundary of the access road, street level imagery identify the garage on all plates (from March 2009).
Area within 50m (including ponds)	No potentially contaminative land uses have been identified within 50m of the site.
Potentially In-Filled Land Within 250m (excluding ponds)	A number of areas of potentially in-filled land have been identified on the historical O.S. maps, which are discussed below by order of date. <u>1850-1851:</u> Reservoir – 135m east – in-filled between 1970 and 1978. Reservoir 60m east – no evidence of in-filling. <u>1927-1928:</u> Reservoirs 180m east - in-filled circa 1980.

3.1.2 A summary of potentially contaminative land uses is presented on Drawing 5.

3.2 Anecdotal Evidence

3.2.1 No additional information on the site history could be sourced.

3.3 Archaeological Considerations

3.3.1 No known archaeological considerations have currently been identified.



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- 3.3.2 Archaeological information has not been sought as part of this desk study and has not been identified as an issue by the Client. Some Local Authorities require at least an initial archaeological appraisal for development sites.
- 3.3.3 Archaeological investigations occasionally reveal ground-related problems from ancient times (prior to the 1st Edition O.S. maps) and can occasionally cause foundation and contamination development hazards.
- 3.3.4 The Local Authority archaeological officer has not been contacted at this stage.

3.4 Planning Information

- 3.4.1 A search of on-line planning information held by Bury Metropolitan Borough Council was undertaken, one previous application for the site (54544) was noted, the design and access statement indicates the last use of the site was a timber yard and joiners workshop which ceased operations in early 2011.
- 3.4.2 An application (63957) was made in 2019 for the land on the western boundary, the application was supported with a Phase 1 desk study report prepared by others. The report identifies the site as gardens. Paddock.

3.5 Previous Reports

- 3.5.1 Demeter Environmental Limited has no knowledge nor has received any reports relating to the site or the surrounding area.

4 ENVIRONMENTAL SETTING

4.1 Published Geology – 1:10,000 Geological Maps

- 4.1.1 The documented geology has been ascertained by the examination of British Geological Survey 1:10,000 Sheet SD71NE and the appropriate geological memoir is summarised hereunder:
- 4.1.2 Deposits of made ground are present 120m east and 243m north east of the site.
- 4.1.3 The drift geology is given as Devensian Till.
- 4.1.4 The solid geology is given as the Holcombe Brook Grit (sandstone) on the eastern area with the Millstone Grit Group (mudstone and siltstone).
- 4.1.5 An inferred coal seam outcrops under the site with a fossil horizon 16m west of the site.



4.2 Published Geology – 1:50,000 Geological Maps

- 4.2.1 The documented geology has been ascertained by the examination of British Geological Survey 1:50,000 Sheet 76 (Rochdale) and the appropriate geological memoir is summarised hereunder:
- 4.2.2 The drift geology is given as Devensian Till.
- 4.2.3 The solid geology is given as the Holcombe Brook Grit (sandstone) on the eastern area with the Marsden Formation (mudstone and siltstone).
- 4.2.4 An inferred coal seam outcrops under the site with a fossil horizon 16m west of the site.

4.3 Data From The Coal Authority

- 4.3.1 The Coal Authority interactive map viewer was accessed; the map indicates the site is not within a "Development High Risk Area".
- 4.3.2 The Development High Risk Area is defined as 'The Development High Risk Area is the part of the coal mining reporting area which contains one or more recorded coal mining related features which have the potential for instability or a degree of risk to the surface from the legacy of coal mining operations. The combination of features includes mine entries; shallow coal workings (recorded and probable); recorded coal mining related hazards; recorded mine gas sites; fissures and breaklines and previous surface mining sites. New development in this defined area needs to demonstrate that the development will be safe and stable taking full account of former coal mining activities. This area was formally known as the Development Referral Area'.

4.4 Borehole Records

- 4.4.1 The BGS Borehole map indicates that there are three borehole records available within 50m of the site which are confidential are not accessible.

4.5 Geological Hazards

- 4.5.1 Potential natural geological hazards which may represent a risk to the proposed development on the site could include the following:



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Table 6: Summary of Potential Natural Geological Hazards Identified in the Groundsure® Reports

Potential Hazard	Assessed Risk on the Site			
Radon	The property is not in a Radon Affected Area, as less than 1% of properties are above the Action Level. No radon protective measures are necessary.			
Background Soil Chemistry	Element	Estimated Geometric Mean (mg/kg)	Residential Threshold(mg/kg)	Industrial / Commercial Threshold (mg/kg)
	Arsenic	15	37 (S4UL)	640 (S4UL)
	Bioaccessible Arsenic	No data		
	Lead	100	200 (C4SL)	750 (C4SL)
	Bioaccessible Lead	60		
	Cadmium	1.8	10 (S4UL)	230 (S4UL)
	Chromium	60-90	620 (S4UL)	30,400 (S4UL)
	Nickel	15-30	130 (S4UL)	1,700 (S4UL)
BGS Estimated Urban Soil Chemistry	No data			
BGS Measured Urban Soil Chemistry	No data			

4.6 Review of Data Obtained from Geology and Ground Stability Groundsure Report

4.6.1 A geology and ground stability report has been procured from Groundsure®, which is presented in Appendix G, and is summarised hereunder.

Table 7: Summary of Data within Groundsure® Geology and Ground Stability Report

Data	Distance (m)	Comments	Significance
Faults	<50m	No data	-
Natural cavities	<250m	No data	
BritPits	<250m	No data	
Surface ground workings	<250m	42m E to 43m SE – reservoir 126m to 136m E – reservoir 130m S – ground workings 169m to 172m E – reservoirs 234m to 236m SE – filter beds 240m SE – ground workings 244m N – workings 248m E – ground workings	Potential sources
Underground workings	<250m	No data	

5 HYDROLOGY AND HYDROGEOLOGY

5.1.1 The geological succession underlying the site may be regarded as a series of discrete units in terms of their hydrogeological significance, as illustrated hereunder:



Table 8: Hydrogeological Interpretation

UNIT	PROPERTIES	AQUIFER TYPE	FLOW TYPE	PERMEABILITY
Made Ground	Likely to be generally granular and permeable and will permit vertical and lateral transmission of groundwater. Where underlain by an aquiclude perched groundwater may be present in depressions at the interface.	N/A	N/A	N/A
Devensian Till	This classification has been assigned in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.	Secondary Undifferentiated	Mixed	Low to high
Marsden Formation / Holcombe Brook Grit	Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers.	Secondary A	Fractured	Low to high

5.2 Assessment of Vulnerability of Surface Water Receptors

5.2.1 The sensitivity of both the surface water receptors and the underlying groundwater in both the drift deposits and bedrock has been assessed in line with the methodology in Appendix C based on the information presented below. Where the risk is regarded as low or very low the receptor will not be regarded as a credible receptor and will not be assessed further.



Table 9: Assessment of Vulnerability of Surface Water Receptors

INFORMATION	Surface Water	Superficial Soils	Bedrock
Aquifer Status of Geology:	N/A	Secondary Undifferentiated	Secondary A
Groundwater Vulnerability	Leaching class: Low Infiltration value: <40% Dilution value: >550mm/year	Vulnerability: Low Aquifer type: Secondary Thickness: 3-10m Patchiness value: <90% Recharge potential: High	Vulnerability: Medium Aquifer type: Secondary Flow mechanism: Well connected fractures
Groundwater Vulnerability Summary:	Summary Classification: Secondary bedrock aquifer - Medium Vulnerability Combined classification: Productive Bedrock Aquifer, Productive Superficial Aquifer.		
Groundwater Vulnerability (soluble rock risk):	N/A	No data	No data
Groundwater Vulnerability- Local Information:	N/A	No data	No data
Groundwater Abstractions (<1,000m) (Only Current Abstractions Are Listed):	N/A	None	
Surface Water Abstractions (<500m) (Only Current Abstractions Are Listed):	479m NE - Supply To A Leat For Throughflow	N/A	
Potable Abstractions (<2,000m) (Only Current Abstractions Are Listed):	N/A	1347m SW	
Source Protection Zones:	N/A	No – none within 500m	
Source Protection Zones (Confined Aquifer):	No data	No data	No data
Surface Water Bodies (<100m):	Northern boundary 4 others between 54m and 99m from the site	N/A	
Surface Water Features (<250m):	nr 1	N/A	
Is the site within a Surface Water / Groundwater Safeguard Zone? (DEFRA MAGIC):	No	No	
Sensitivity of Surface Water / Groundwater:	M1 – moderate	L2 – very low	L2 - low

6 DATA OBTAINED FROM REGULATORY BODIES AND OTHERS

6.1 Data From Groundsure

6.1.1 An Environmental Data Report was procured from Groundsure®. Groundsure® reports contain a broad spectrum of environmental data collated from many sources, including the Environment Agency and the relevant local authority. The report is contained in Appendix G.

6.1.2 Relevant data on potentially contaminative land uses within the report, covering an area within a radius of 50m (250m for landfill and other waste sites) from the site is summarised hereunder:



Table 10: Summary of Groundsure® Environmental Data Report

Data	Distance	Comments	Significance
Historical Land Uses (Industrial, tanks, energy features, petrol stations, garages)	On Site	No data	-
	<50m	31m SE – electricity substation	Potential source
Historical military land	On Site	No data	-
	<50m	No data	-
Active or Recent Landfill	On Site	No data	-
	<250m	No data	-
Landfills (historical from BGS/EA/LA, NRW, O.S. maps)	On Site	No data	-
	<250m	No data	-
Historical and Licensed Waste Sites	On Site	No data	-
	<50m	No data	-
Waste Exemptions	On Site	No data	-
	<50m	No data	-
Recent Industrial Land Uses	On Site	Factory	Potential source
	<50m	3m NW – Smithy Garage 32m NW – Domsun Developments Ltd	Potential sources
Current or Recent Petrol Stations	On Site	No data	-
	<50m	No data	-
Sites determined as Contaminated Land	On Site	No data	-
	<50m	No data	-
Control of Major Accident Hazards (COMAH)	On Site	No data	-
	<50m	No data	-
Regulated Explosive Sites	On Site	No data	-
	<50m	No data	-
Hazardous Substance Storage/Usage	On Site	No data	-
	<50m	No data	-
Historical licensed industrial activities (IPC)	On Site	No data	-
	<50m	No data	-
Licensed Industrial Activities (Part A(1))	On Site	No data	-
	<50m	No data	-
Licensed Pollutant Release (Part A(2)/B)	On Site	No data	-
	<50m	No data	-
Radioactive Substance Authorisations	On Site	No data	-
	<50m	No data	-
Pollutant Release To Surface Waters (Red List)	On Site	No data	-
	<50m	No data	-
Pollutant Release To Public Sewer	On Site	No data	-
	<50m	No data	-
List 1 Dangerous Substances	On Site	No data	-
	<50m	No data	-
List 2 Dangerous Substances	On Site	No data	-
	<50m	No data	-
Pollution Incidents (EA/NRW)	On Site	No data	-
	<50m	No data	-
Pollution inventory substances	On Site	No data	-
	<50m	No data	-
Pollution inventory waste transfers	On Site	No data	-
	<50m	No data	-
Pollution inventory radioactive waste	On Site	No data	-
	<50m	No data	-

7 GAPS AND UNCERTAINTIES IN DATA

7.1.1 The gaps in the data and uncertainties in the report are given below:

- Presence of in-filled pond on first edition O.S. map



8 PRELIMINARY CONCEPTUAL MODEL AND PRELIMINARILY RISK ASSESSMENT

8.1 Introduction

- 8.1.1 The findings of the desk study have been used to develop a preliminary conceptual model of the site, which identifies potential contaminant linkages. The scope of the model is intended primarily to identify potential impacts to human health and environmental receptors from potential on-site and off-site contamination sources. More generalised comments may be included with respect to potential impacts to the wider ecosystem if relevant.
- 8.1.2 Contaminated land is defined under Section 78A(2) of the Environmental Protection Act 1990 IIA, as “Any land which appears to the Local Authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land that:
- Significant harm is being caused, or there is significant possibility of such harm being caused, or
 - Pollution of controlled waters is being or is likely to be caused”
- 8.1.3 Thus land can be defined as contaminated if it is causing significant harm; or where substances in, on or under the land are polluting a controlled water, or there is a significant risk of this happening.
- 8.1.4 Current approaches (Guidance on ‘Land contamination risk management (LCRM), Part IIA of the Environmental Protection Act 1990 and the National Planning Policy Framework) to risk assessment of contaminated land suggest the construction of a Preliminary Conceptual Model. The purpose of this model is to define all possible complete contaminant linkages, where the requisite source – pathway – target elements are present, and these elements being defined as:
- a contaminant (source) is a hazardous substance or agent, present at levels that have the potential to cause harm or damage a receptor
 - a pathway is the means by or through which a contaminant comes into contact with, or otherwise affects, the receptor
 - a receptor (target) is an entity (human being, aquatic environment, flora and fauna etc.) that is vulnerable to the adverse effects of the contaminant
- 8.1.5 This relationship is termed a “contaminant linkage”. It should be recognised that for a health or environmental risk to exist, all three elements of the relationship or linkage must be present, i.e.



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- if there is no contaminant, or contaminant present at levels below those considered to be harmful or damaging to a receptor, then there can be no adverse effect on a receptor
- if there is no receptor present that can be adversely affected by a contaminant, no harm or damage can arise
- even where both a contaminant and a receptor are present, no harm or damage will occur if there is no pathway by or through which a linkage between the two can be established

8.1.6 The information collated in the desk study was assessed hereunder to determine the potential contaminant linkage(s) existing on this site, and the likelihood of the linkage being present, allowing the construction of a preliminary conceptual model, as discussed hereunder.

8.2 Assessment of Potential Sources of Contamination

8.2.1 The potential sources of contamination identified in the desk study summarised hereunder:

Table 11: Potential Sources of Contamination

Potential Source of Contamination	Distance to Site	Dates Identified on Historical Maps	Discussion	Probability	Consequence	Risk	Does source warrant further assessment?
Made ground	On site	N/A	Site History: Given that the site has been previously developed it is likely that deposits of made ground will be present on the site.	Likely	Medium – chronic effect on human health	Moderate	Yes
Made ground / pond	On site	N/A	There is the potential for an in-filled pond to be present on the north eastern area of the site, this has the potential to generate ground gases. The gas generation potential is regarded as very low, the risk of lateral migration as negligible and the risk for development on site is regarded as low. Where the SOM is between 5% and 15% the level of risk for on site development is regarded as low to moderate.	Low	Severe – acute risk to human health	Moderate	Yes
Site buildings / Timber Yard / Joinery	On site	<1929 - 2011	The past uses of the site have the potential to impact on site soils	Likely	Medium – chronic effect on human health	Moderate	Yes
Use / storage of chemicals and/or fuel on the site	On site and within 15m of the site	N/A	Based on the site history there is the possibility that chemicals / fuels have been used and/or stored either on the site or within 15m of the site.	Likely	Medium – ingress of contaminants through plastic potable water pipes	Moderate	Yes
Potential for mobile contamination (VOC's, fuels etc.)	On site	N/A	Given the history of the site it is possible that mobile contamination may be present on the site (i.e. the natural soils may have been impacted)	Likely	Medium – chronic effect on human health	Moderate	Yes
Smithy Garage	Western boundary	2022	The garage is a potential source of contamination	Likely	Medium – chronic effect on human health	Moderate	Yes
Electricity substation	31m south east	N/A – Groundsure report	The substation and industry are too distant for any credible pathways to be present, hence the probability of risk occurring is regarded as unlikely	Unlikely	Medium – chronic effect on human health	Low	No
Domsun Developments Ltd	32m north west					Low	No
Reservoir	60m east	1850 - 2022	As the reservoirs has not been in-filled it is not regarded as a credible source of ground gases	None – not a credible source	Severe – acute risk to human health	Low	No
Ground workings	130m south	N/A – Groundsure report	The workings appear to be a raised area associated with a dwelling, as there is no evidence of in-filling the workings are not regarded as a credible source of ground gases. The gas generation potential is regarded as low, the risk of lateral migration is low (as the in-filled land is not identified as a landfill), the in-filled reservoir is also between 10m and 20m below the site reducing the probability risk occurring to negligible	None – not a credible source	Severe – acute risk to human health	Low	No
Made ground	120m east			Negligible	Severe – acute risk to human health	Low	No
Reservoir	135m east	1850 - <1978		Negligible	Severe – acute risk to human health	Low	No
Reservoirs	180m east	1927 - <1980					
Filter beds	234m to 236m south east	N/A – Groundsure report	The filter beds are regarded as too distant for any credible pathways to be present	Negligible	Severe – acute risk to human health	Low	No
Ground workings	240m south east		The workings appear to be a slop on the banks of the River Irwell, as there is no evidence of in-filling the workings are not regarded as a credible source of ground gases.	None – not a credible source	Severe – acute risk to human health	Low	No
Workings	244m north		The workings appear to be a sand pit 255m north of the site which was in-filled prior to the 1908 map, based on the distance to the potential source the probability of risk occurring is regarded as Negligible.	Negligible	Severe – acute risk to human health	Low	No
Ground workings	248m east		The workings appear to be a raised area, as there is no evidence of in-filling the workings are not regarded as a credible source of ground gases.	None – not a credible source	Severe – acute risk to human health	Low	No

8.3 Identification of Potential Receptors

8.3.1 Potential receptors of contamination on this site may be represented as tabulated hereunder:

Table 12: Potential Receptors

ID	POTENTIAL RECEPTOR	IS THE RECEPTOR PRESENT?	JUSTIFICATION FOR INCLUSION / EXCLUSION
A	Human beings (construction workers)	Yes	Will be on site during the construction phase
B	Human beings (future residents)	No	The proposed development is commercial
C	Human beings (future worker occupants)	Yes	
D	Human beings (trespassers / transient users)	Yes	May be present on the proposed development
E	Human beings (worker occupants of adjacent properties)	Yes	Commercial buildings adjoin the site
F	Human beings (residents of adjacent properties)	Yes	Dwellings adjoin the site
G	Designated ecological systems	No	None have been identified
H	On site flora and fauna	No	No sensitive species have been identified
I	Property in the form of buildings (on site)	Yes	The development includes the erection of dwellings/buildings
J	Property in the form of buildings (adjacent)	No	No buildings form the site boundaries
K	Property in the form of crops/livestock (on site)	No	Will not form part of the development
L	Property in the form of crops/livestock (adjacent)	No	None have been identified
M	Potable water mains (on site)	Yes	The site will be served by potable water mains
N	Potable water mains (off site)	No	It is unlikely that water mains for nearby sites will run through the subject site.
O	Groundwater (underlying aquifer)	No	
P	Surface water bodies	Yes	XXXXX

8.4 Potential Pathways

8.4.1 Taking account of the intended use of the site, the pathways by which the above sources and receptors may be linked may be summarised as follows:

Table 13: Potential Pathways

ID	POTENTIAL RECEPTOR	ASSOCIATED POTENTIAL PATHWAYS	JUSTIFICATION FOR EXCLUSION
A	Human beings (construction workers)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Migration of ground gases through permeable strata / preferential pathways	
B	Human beings (future worker occupants)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Dermal contact with soil / soil dust outdoors Dermal contact with soil dust indoors Inhalation of soil dust indoors Inhalation of soil dust outdoors Inhalation of soil vapours indoors Inhalation of soil vapours outdoors Migration of ground gases through permeable strata / preferential pathways	
D	Human beings (trespassers / transient users)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust	
E	Human beings (worker occupants of adjacent properties)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Dermal contact with soil / soil dust outdoors Dermal contact with soil dust indoors Inhalation of soil dust indoors Inhalation of soil dust outdoors Inhalation of soil vapours indoors Inhalation of soil vapours outdoors Migration of ground gases through permeable strata / preferential pathways	
F	Human beings (residents of adjacent properties)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Dermal contact with soil / soil dust outdoors Dermal contact with soil dust indoors Ingestion of home-grown produce Ingestion of soil attached to home-grown produce Inhalation of soil dust indoors Inhalation of soil dust outdoors Inhalation of soil vapours indoors Inhalation of soil vapours outdoors Migration of ground gases through permeable strata / preferential pathways	
I	Property in the form of buildings (on site)	Direct contact with aggressive ground conditions Migration of ground gases through permeable strata / preferential pathways	
M	Potable water mains (on site)	Direct contact with aggressive ground conditions Direct contact with organic contamination	
P	Surface water bodies	Migration of impacted water	



8.5 Preliminarily Qualitative Risk Assessment

8.5.1 In accordance with the current UK Government of 'suitable for use' approach to the assessment of contaminated land, a preliminarily qualitative risk assessment has been undertaken on the potential contaminant linkages identified above, which considers the magnitude of the potential consequence of the risk occurring, the magnitude of the probability of the risk occurring and provides an overall risk classification.

8.5.2 The following sections discuss all the identified potential on and off site sources which warrant further consideration (see Clause 7.2), pathways and receptors in the context of the proposed development and plausible pollutant linkages which may represent a risk to identified receptors such as human health and/or controlled waters from the data gained from the desk study. At this stage the assessment is qualitative and aimed to determine all pollutant linkages, irrespective of significance or allowing for uncertainty.

8.5.3 The purpose of the PQRA is to:

- Refine and update the conceptual model;
- Confirm the presence of actual pollutant linkages;
- Evaluate potentially unacceptable risks; and
- Provide the basis for the options appraisal when unacceptable risks are identified at the site.

8.5.4 The methodology used in the 2001 CIRIA report C552 – 'Contaminated Land Risk Assessment. A Guide to Good Practice' and 'Guidance for the Safe Development of Housing on Land Affected by Contamination' is used here and is discussed in Appendix C.

8.5.5 Based on the above a Preliminary Conceptual Model (PCM) has been created and is presented in hereunder.

Table 14: Preliminary Conceptual Model

PPL ID	Source	Pollutant(s)	Receptor(s)	Pathways to Receptor	Probability	Consequence	Risk
1	Made Ground Sawmill / workshop / past land uses	Arsenic, asbestos, barium, beryllium, cadmium, chromium (III and VI), copper, cyanide, lead, mercury, molybdenum, nickel, PAH's (USEPA 16) selenium, sulphur, thallium, hydrocarbons (TPHCWG), vanadium, zinc VOC's SVOC's	Human beings (construction workers)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Migration of ground gases through permeable strata / preferential pathways	Likely	Minor – can be prevented by the use of PPE	Low
2			Human beings (future worker occupants)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Dermal contact with soil / soil dust outdoors Dermal contact with soil dust indoors Inhalation of soil dust indoors Inhalation of soil dust outdoors Inhalation of soil vapours indoors Inhalation of soil vapours outdoors Migration of ground gases through permeable strata / preferential pathways		Medium – there is a potential for chronic effects to humans	Moderate
3			Human beings (trespassers / transient users)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust		Medium – there is a potential for chronic effects to humans	Moderate
4			Human beings (worker occupants of adjacent properties)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Dermal contact with soil / soil dust outdoors Dermal contact with soil dust indoors Inhalation of soil dust indoors Inhalation of soil dust outdoors Inhalation of soil vapours indoors Inhalation of soil vapours outdoors Migration of ground gases through permeable strata / preferential pathways		Medium – there is a potential for chronic effects to humans	Moderate
5			Human beings (residents of adjacent properties)	Ingestion of soil / soil dust Dermal contact with soil / soil dust Inhalation of soil dust Dermal contact with soil / soil dust outdoors Dermal contact with soil dust indoors Ingestion of home-grown produce Ingestion of soil attached to home-grown produce Inhalation of soil dust indoors Inhalation of soil dust outdoors Inhalation of soil vapours indoors Inhalation of soil vapours outdoors Migration of ground gases through permeable strata / preferential pathways		Medium – there is a potential for chronic effects to humans	Moderate
6			Property in the form of buildings (on site)	Direct contact with aggressive ground conditions Migration of ground gases through permeable strata / preferential pathways		Mild – significant damage to buildings	Moderate / low
7			Potable water mains (on site)	Direct contact with aggressive ground conditions Direct contact with organic contamination		Medium – ingress of contaminants through plastic potable water pipes	Moderate
8			Surface water bodies	Migration of impacted water		Mild – pollution of moderate sensitivity aquifer	Moderate / low



8.5.6 The potential significant linkages listed above are based on the available data listed in the sections above and the features noted during the site walkover. Therefore, the linkages identified are tentative and subject to the following uncertainties(s):

- Presence of made ground under the site;
- Past uses of the site have impacted site soils;

8.5.7 The precautionary principle as discussed in PPS23 (withdrawn) has been applied in the assessment of potential sources, pathways and receptors.

8.5.8 It can be seen that contaminant linkages 2 to 8 require further investigation.

9 FIELDWORK

9.1 Completed Works – April 2024

9.1.1 The fieldwork was undertaken in line with the proposals in the desk study report presented in Clause 2. The site investigation comprised of the following:

- The excavation of ten trial pits to a typical depth of 1.50mbgl.

9.1.2 An engineer from Demeter Environmental Limited logged each hole and collected representative samples for chemical and soil engineering analysis.

9.1.3 Exploratory locations were screened with a Cable Avoidance Tool (CAT).

9.1.4 The investigation was undertaken broadly in accordance with the requirements of BS 5930:1999 Addendum 2 and BS10175:2011.

9.1.5 The site investigation layout is presented on Drawing 4 in Appendix E.

9.1.6 The methodologies employed in the fieldwork are presented in Appendix D.

9.1.7 Detailed trial pit section sheets are presented in Appendix H.

9.2 Completed works – November 2024

9.2.1 On completion of the site clearance additional works were undertaken in order to further characterise the potential issues with mercury in site soils, this comprised of a 10m non-targeted herringbone sampling grid offset by 5m east from the April 2024 investigation.

9.2.2 The site investigation layout is presented on Drawing 5 in Appendix E.

9.2.3 The methodologies employed in the fieldwork are presented in Appendix D.



9.2.4 Detailed trial pit section sheets are presented in Appendix H.

9.3 Quality Control

9.3.1 Samples were despatched in batches on a daily basis under a chain of custody procedure to The Environmental Laboratory, who are a UKAS accredited laboratory for subsequent chemical analysis. MCERTs analysis was requested where possible.

9.3.2 Samples were stored within cool boxes containing ice packs. All contractors used during this project have been approved by **Demeter Environmental Ltd** as a part of the in-house management systems (BS ISO 9001, BS ISO 14001, BS ISO 18001) procedure. This requires all third parties to demonstrate competence and a high standard of work during a regular audit scheme.

9.4 Health and Safety

9.4.1 All work has been undertaken in line with the Demeter Environmental Ltd ISO18001 health and safety policy.

9.5 Access Restrictions – April 2024

9.5.1 Demeter Environmental Limited was unable to excavate a trial pit within the former factory building (notional trial pit TP109) as the roof was too low for the excavator to operate.

9.6 Access Restrictions – November 2024

9.6.1 There were no access restrictions to the November 2024 investigation.

9.7 Observed Geology

9.7.1 The general succession of strata encountered during the site investigation can be summarised as made ground comprising mainly of Brown SAND with brick, concrete, metal, sandstone cobbles and glass. (MADE GROUND) overlying Brown/yellow clayey SILT/ silty CLAY). The solid geology was not confirmed during the site investigation.

Table 15: Generalised Strata Sequence

Strata	Depth range (mbgl)		Thickness range (m)
	Top	Base	
Brown SAND with brick, concrete, metal, sandstone cobbles and glass. (MADE GROUND)	GL	1.00 (Based on TP101)	1.00
Brown/yellow clayey SILT	1.00 (Based on TP101)	Not proven	Not proven



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9.7.2 The general succession of strata encountered during the November site investigation was very similar to the strata encountered in the April 2024 site investigation.

9.7.3 Made ground varied from no made ground present (TP201 only) to 1.20mbgl (TP206).

9.8 Relic Structures

9.8.1 A Relic structure was encountered in TP205 (concrete strip foundation exposed in at 0.90mbgl on eastern face of trial pit).

9.9 Visual and Olfactory Evidence of Contamination

9.9.1 Visual evidence of ash was noted in TP105 at 0.05 to 1.00mbgl. This stratum was subject to hydrocarbon and broad range analyses.

9.9.2 No visual or olfactory evidence of contamination was noted in the November 2024 investigation.

9.10 Groundwater Levels

9.10.1 Water levels recorded both during the investigation are presented hereunder:

Table 16: Groundwater Levels

POSITION / DEPTH (mbgl)	FIELDWORK
TP101, TP102	Dry
TP103	1.30mbgl – Slight seepage into base of trial pit.
TP104 – TP111	Dry
TP201-TP213 (November 2024 investigation)	Dry

10 CHEMICAL LABORATORY TESTING

10.1 April 2024

10.1.1 Representative samples recovered during the site investigation were dispatched daily under their 'Chain of Custody' protocols to Chemtech Environmental Limited (a UKAS and MCERTS accredited laboratory).

10.1.2 The following programme of chemical testing was undertaken:



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- Nine disturbed spot samples of soil (anthropogenic) were analysed for made ground suite and hydrocarbon suite presented in Table 2 (to determine if the made ground is impacted by elevated levels of contamination);

10.1.3 The contamination analyses certificate is presented in Appendix I.

10.1.4 There was an error original contamination analysis certificates; the depths were incorrectly reported as 0.00 – depth, this was queried and a replacement certificate was produced by the laboratory, these are also included in Appendix I for completeness.

10.2 November 2024

10.2.1 Representative samples recovered during the site investigation were dispatched daily under their 'Chain of Custody' protocols to the Environmental Laboratory Limited (a UKAS and MCERTS accredited laboratory).

10.2.2 The following programme of chemical testing was undertaken:

- 15 disturbed spot samples of soil (anthropogenic) were analysed for Total Mercury (to determine if the made ground is impacted by elevated levels of mercury contamination);
- 8 disturbed spot samples of soil (natural) were analysed for Mercury (to determine if the natural soils are impacted by elevated levels of mercury contamination);

10.3 Sample Deviations

10.3.1 A deviation was recorded by the laboratory on the sample from TP220 at 0.20mbgl, the deviation related to the sample not being received in appropriate containers. This sample was subject to a broad range analysis with the samples being taken in a plastic tub and an amber glass jar. It is understood that the amber glass jar was broken during transit to the laboratory.

10.3.2 It is unlikely that this will affect the risk assessment.

10.3.3 The deviations are in relation to three samples (TP202, TP210 and TP212) all of which were subject to methyl mercury analysis, the original certificate is also presented in Appendix G which shows there were no deviations for the initial mercury analysis. The deviation was caused by delays in the laboratory scheduling the additional works. It is unlikely that this will affect the results.



11 ASSESSMENT OF POTENTIAL POLLUTION LINKAGES

11.1 Introduction

11.1.1 The assessment of the potential pollution linkages presented in Table 2 are discussed below.

11.1.2 The human health risk assessment methodology employed by Demeter Environmental is presented in Appendix C.

11.1.3 The Tier 1 GAC's based the commercial scenario and 1% soil organic matter (SOM) from a number of sources are used, namely:

1. Land Quality Management Suitable for Use Levels (S4UL's) (Copyright Land Quality Management Limited reproduced with permission; Publication number S4UL3093. All rights reserved);
2. C4SL for lead (the C4SL is used in lieu of the in house derived GAC as it provides a more conservative assessment);
3. EIC/AGS/CL:AIRE Generic Assessment Criteria;
4. In-house derived GAC's / S4UL's derived using the default parameters for the standard land use scenario set out in the CLEA technical report, toxicological data in line with the requirements of Science Report SC050021/SR29, Science Report P5-080/TR310, DEFRA SP1010 and the methodology employed to derive the S4UL's.



11.1.4 The assessment tables are presented in Appendix J, and are summarised below:

Table 17: Summary of Risk Assessment

Pollution Linkages:	2 to 8
Aim / Objective:	To determine if made ground is present on the site and if present, is it impacted by elevated levels of contamination; To determine if the past uses if the site have impacted site soils;
Sampling Locations:	Made ground was recorded in all locations apart from TP108. Samples from TP101, TP102, TP103, TP104, TP105, TP106, TP107, TP110 and TP111 were subject to chemical testing to the made ground suite.
Discussion	A single exceedance of lead was recorded in the made ground from TP106. Pro UCL was used to derive a 95th UCL for lead in the made ground, the 95th UCL was calculated to be 1,838mg/kg, as this is below the S4UL of 3,200mg/kg the lead in the made ground on the site does not pose a risk to end users. The exceedances of mercury (for a residential scenario – off site receptors) have the potential for inhalation pathways to be present, nine samples were subject to chemical analysis, four exceedances and 7 positive results were obtained. The exceedances are spread across the site. No positive VOC results were recorded hence inhalation of soil vapours is not a credible pathway on this site. For elemental mercury the inhalation pathway accounts for 80% of the exposure, indicating there is the potential for the inhalation as mercury vapours on the site. The S4UL for methylmercury is 11mg/kg, if this is used one exceedance is still present, for inorganic mercury the S4UL is 40mg/kg and using this the concentrations of mercury across the site is not an issue. However, as the nature of the mercury on the site the possibility of inhalation of mercury vapours cannot be discounted. An additional investigation was undertaken in November 2024 after the site had been cleared in order to obtain further samples for mercury analysis, the results confirmed that the site soils were impacted by mercury. In order to characterise the risks from inhalation of mercury an additional methyl mercury analysis was undertaken on three of the samples (3 highest results), all results were below the limit of detection of 100ug/kg. SoBRA published Category 4 Screening Levels (C4SL) for inorganic mercury in August 2024, this states that inorganic mercury can be compared with chemical analysis for total mercury, using this approach in the assessment the S4UL of 40mg/kg should be adopted. Based on this, the concentrations of mercury on the site do not pose a risk to human health (off site residents). It should be noted that the C4SL is 200mg/kg, however adopting the S4UL has provided a more conservative assessment.
Summary:	Made ground does not pose a risk to human health.





Table 18 (Continued): Summary of Risk Assessment

Pollution Linkages:	2 to 8
Aim / Objective:	To determine if the site soils have the potential to generate ground gases
Sampling Locations:	TP101, TP102, TP103, TP104, TP105, TP106, TP107, TP110, TP111
Discussion	Twelve samples were subject to Total Organic Carbon (TOC) analysis, samples were taken from TP101, TP102, TP103, TP104, TP105, TP106, TP107, TP110, TP111, the results ranged from 2.2% to 17% with an average of 10%. Using the guidance in CL:AIRE RB 17 – pragmatic Approach to Ground Gas Risk Assessment' the site requires gas monitoring. However; given the depth of made ground is typically 1m (maximum of 1.6m) and is less than the anticipated depth given the site was probably subject to a cut and fill exercise, the gassing potential is regarded as lower than the TOC results suggest. Based on this the risk from site soils generating ground gases is negligible.
Summary:	Site soils are not a credible source of ground gases.
Pollution Linkages:	2 to 8
Aim / Objective:	To determine if the site has the potential to impact controlled waters
Sampling Locations:	TP101, TP102, TP103, TP104, TP105, TP106, TP107, TP110, TP111
Discussion	Given that remediation will be required to break the pollution linkages associated with end users and site soils, any residual risks posed by the site will be reduced to unlikely by the removal of impacted soils, reduction of infiltration by the presence of hard-standing.
Summary:	The site after remediation and development will not pose a risk to controlled waters.

11.2 Assessment of the Risks Posed by Made Ground to Concrete / Building Fabric

11.2.1 An assessment on whether site soils are aggressive to concrete has been undertaken in line with the guidance in BRE Special Digest 1:2005 "Concrete in Aggressive Ground" and the assessment is presented hereunder:



Table 19: Design Chemical Class Based on Soil Data

CONCRETE SPECIFICATION DATA SHEET		
Is the site brownfield or greenfield?	Brownfield	
Is the water table static or mobile?	Static	
Average of highest 25% (2) Highest water soluble Sulphate result	50mg/l	Design Sulphate Class of DS-1 and ACEC Class of AC-1s
Average of lowest 25% (2) pH results	7.6	
Intended Working Life	100 years	Adopt Design Chemical Classification of DC-1

11.2.2 On the basis of the foregoing assessments, concrete in the ground should be specified to conform to the compositional requirements of Design Chemical Class DC 1, as defined in BRE Special Digest 1: 2005.

11.3 Assessment of the Risks to Water Supply Pipes From Made Ground

11.3.1 The assessment of the suitability of water supply pipes has been undertaken in line with the guidance in the publication 'Guidance for the Selection of Water Supply Pipes to be used in Brownfield Sites' published by the UK Water Industry Research (UKWIR).

11.3.2 At the time of the investigation the alignment of the water mains was unknown, hence the assessment below is based on results for the entirety of the site.

11.3.3 The assessment table is presented in Appendix J, and based on this assessment; water mains should be specified as barrier pipe due to elevated concentrations of hydrocarbon (EC16-EC40) and PAH's in TP101 and TP102.

11.3.4 It should be noted that this assessment is based on the chemicals/contaminants identified in the preliminarily conceptual model in the desk study report.

11.3.5 The approval of the recommendations should be sought from the appropriate water company prior to the laying of the pipes.

12 CONCEPTUAL MODEL

12.1.1 Based on the findings of the investigation, the preliminary conceptual model can be refined to illustrate the proven pollution linkages. Conceptual remediation recommendations may be proposed against each proven linkage as tabulated hereunder.



Table 20: Refined Preliminarily Conceptual Model

PPL ID	Source	Pollutant(s)	Receptor(s)	Pathways to Receptor	Probability	Consequence	Risk
1	Made Ground Sawmill / workshop / past land uses	Hydrocarbons, PAH's	Potable water mains (on site)	Direct contact with aggressive ground conditions Direct contact with organic contamination	Likely	Medium – ingress of contaminants through plastic potable water pipes	Likely



13 SUMMARY OF RISK ASSESSMENT

13.1.1 The conclusions and recommendations hereunder are based on the relevant sections of the report and should not be referred to in isolation of the relevant sections of the text. All recommendations are subject to Regulatory Authority review.

13.1.2 A GQRA has been undertaken as an initial assessment of the potential risks to human health and controlled waters from the potential sources identified in the desk study report. The risk to the identified receptors is presented hereunder:

13.2 Risks To Human Receptors

13.2.1 No issues have been identified.

13.3 Risks To Building Fabric

13.3.1 No issues have been identified.

13.4 Risks To Water Mains

13.4.1 Water mains are to be specified as barrier pipe.

13.5 Risks to Controlled Waters

13.5.1 No issues have been identified.

14 PROPOSALS FOR REMEDIATION

14.1 Water Mains

14.1.1 Water mains are to be specified as barrier pipe.

15 MANAGEMENT OF UNEXPECTED CONTAMINATION

15.1.1 It is possible that further contamination may be found at any time during the development. Should such contamination be identified or suspected during the site clearance or ground works, these should be dealt with accordingly.

15.1.2 A number of options are available for handling this material, which include:

- The removal from site and disposal to a suitably licensed tip of all material suspected of being contaminated. The material would need to be classified prior to disposal.
- Short-term storage of the suspected material while undertaking verification testing for potential contamination. The storage area should be a contained area to ensure that



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contamination does not migrate and affect other areas of the site. Depending upon the amounts of material under consideration, this could be either a skip or a lined area.

- Having a suitably experienced environmental engineer either on-call or with a watching brief for the visual and olfactory assessment of the material, and sampling for verification purposes.

16 LIAISON WITH THE LOCAL PLANNING AUTHORITY

16.1.1 Prior to the commencement of any site works it is recommended that a copy of this report is forwarded to Bury Metropolitan Borough Council, and their approval of the report is obtained prior to the commencement of any works on the site.

17 RESPONSIBILITY OF DEVELOPER / LANDOWNER

17.1.1 It should be noted that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

18 FURTHER WORKS

18.1.1 Approval from the water supplier should be sought prior to the laying of water mains.



APPENDIX A: REFERENCES

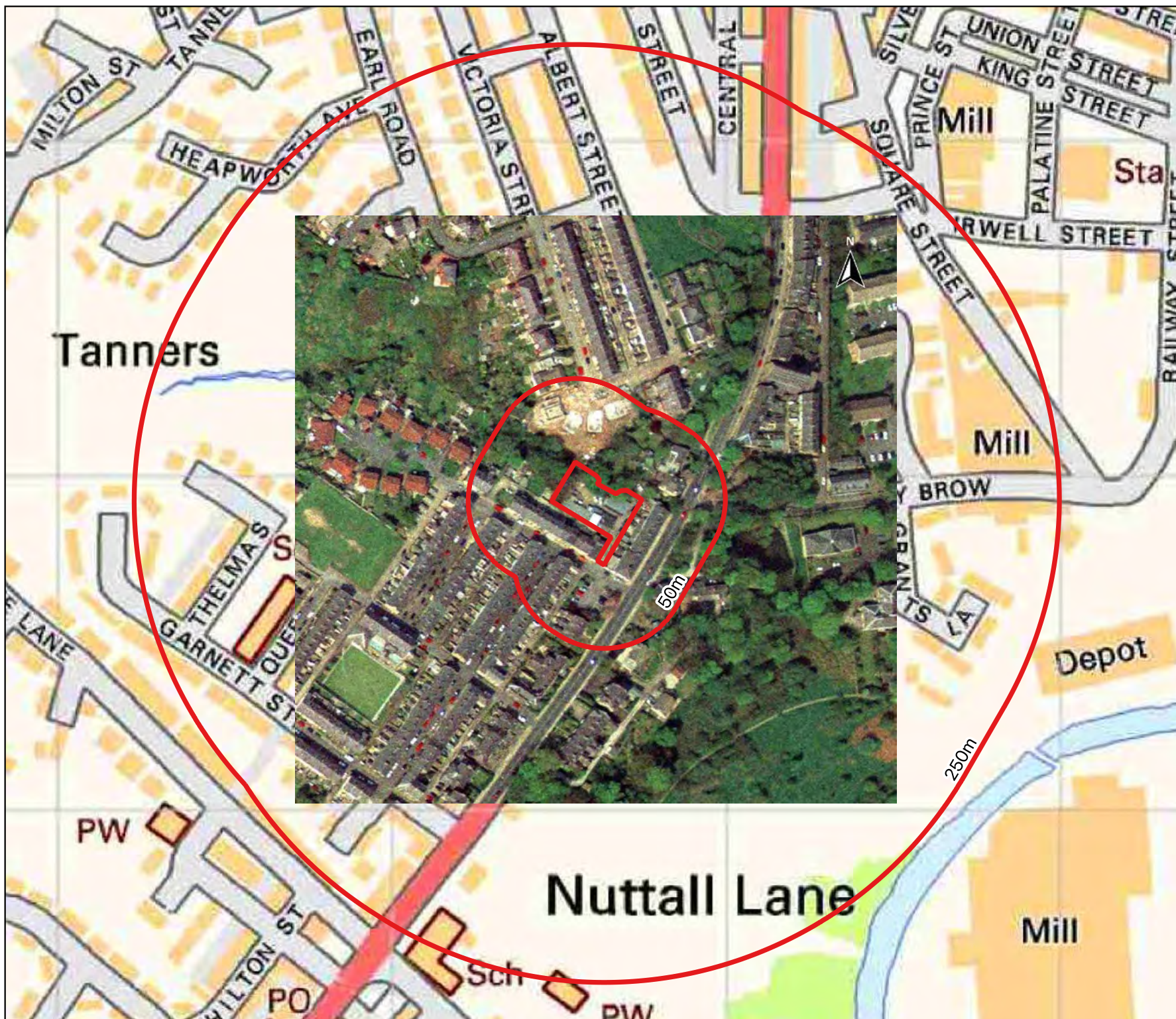
The following documents were available or have been obtained for reference or obtaining data:

Groundsure Report			
BGS Borehole Record Viewer			
Land contamination risk management (LCRM)	Environment Agency	LCRM	2020
The Environmental Protection Act	1990		
The Contaminated Land (Wales) Regulations	2006		
The Contaminated Land (Scotland) Regulations	2000		
The Environment Act	1995		
The Radioactive Contaminated Land (Modifications of Enactments) (England) Regulations	2006		
The Radioactive Contaminated Land (Modifications of Enactments) (Wales) Regulations	2006		
The Radioactive Contaminated Land (Scotland) Regulations	2007		
The Water Resources Act	1991		
The Water Act	2003		
The Water Environment and Water Services (Scotland) Act	2003		
The Water (Northern Ireland) Order	1999		
The Wildlife and Country Act	1981		
The Conservation (Natural Habitats, etc.) Regulations	1994		
The Town and Country Planning Act	1990		
The Town and Country Planning (Scotland) Act	1997		
The Building Control Act	1990		
The Construction Design and Maintenance (CDM) Regulations	2007		
The Control of Substances Hazardous to Health (COSHH) Regulations	2002		
The Factories Act	1961		
The Offices, Shops and Railway Premises Act	1963		
The Health and Safety at Work, etc. Act	1974		
The Pollution Prevention and Control Act	1999		
The Control of Pollution Act 1994 as amended	1994		
The Environmental Damage (Prevention and Remediation) Regulations	2009		
The Environmental Damage (Prevention and Remediation) (Wales) Regulations	2009		
The Environmental Liability (Scotland)	2009		
The Environmental Protection (Duty of Care) Regulations	1991		
The Environmental Permitting (England and Wales) Regulations	2007		
The Pollution Prevention and Control (Scotland) regulations	2000		
Guidance on investigations for ground gas. Permanent gases and Volatile Organic Compounds (VOCs)	2013	BS 8576:2013	2013
Good practice on the testing and verification of protection systems for buildings against hazardous ground gases	CIRIA	C735	August 2014
Investigation of Potentially Contaminated Sites	BSI	BS10175:2011+A2:2017	2017
Environmental Protection Act 1990: Part 2A - Contaminated Land Statutory Guidance	DEFRA	-	April 2012
Environmental Protection Act 1990: Part 2A - Contaminated Land	DEFRA	Circular 1/2006	September 2006 (withdrawn April 2012)
National Planning Policy Framework	Communities and Local Government	-	19 th February 2019
Guiding Principles for Land Contamination Planning and Pollution Control	Environment Agency ODPM	GPLC1 / GPLC2 / GPLC3 PPS23	March 2010 November 2004 (withdrawn March 2012)
Circular 22/87: Development of Contaminated Land	Welsh Government	22/87	August 1987
Planning Advice Note PAN 33	Scottish Government	PAN 33	October 2000
Contaminated Land Statutory Guidance for Wales	Welsh Government	WG15450	2012
Explanatory Memorandum to the Contaminated Land	Welsh Government	-	February

(Wales) (Amendment) Regulations 2012 and the draft Contaminated Land Statutory Guidance 2012			2012
NHBC Standards	NHBC	-	2014
Code of Practice for Ground Investigations	BSI	BS5930:2015+A1:2020	June 2020
Technical aspects of site investigations in relation to land contamination	Environment Agency	EA P5-065/TR:2000	2000
Contaminated Land Risk Assessment: A Guide to Good Practice	CIRIA	C552	2001
Secondary model for the development of appropriate soil sampling strategies for contaminated land	Environment Agency	EA P5-066/TR:2000	2000
Remedial Targets Methodology - Hydrogeological Risk assessment for Land Contamination	Environment Agency		2006
The physical properties of the minor aquifers in England and Wales	BGS		2000
A framework for assessing the impact of contaminated land on groundwater and surface water	Department of the Environment	DOE CLR 1	1994
Environment Agency technical advice to third parties on Pollution of Controlled Waters for Part IIA of the Environmental Protection Act 1990.	Environment Agency		May 2002
Guidance on Preliminary site inspection of contaminated land	Department of the Environment	DOE CLR 2	1994
Documentary search on industrial sites	Department of the Environment	DOE CLR 3	1994
Sampling strategies for contaminated land	Department of the Environment	DOE CLR 4	1994
Information systems for land contamination	Department of the Environment	DOE CLR 5	1994
Prioritisation + categorisation procedure for sites which may be contaminated	Department of the Environment	DOE CLR 6	1995
Model Procedures for the Management of Land Contamination	Environment Agency	CLEA CLR 11	September 2004 (withdrawn)
A quality approach for contaminated land consultancy	Department of the Environment	DOE CLR 12	1997
Human health toxicological assessment of contaminants in soil	Environment Agency	Science Report SC050021/SR2	January 2009
Updated technical background to the CLEA model	Environment Agency	Science Report SC050021/SR3	January 2009
A review of body weight and height data used within the Contaminated Land Exposure Assessment model (CLEA)	Environment Agency	SC050021/ Technical Review 1	2009
Compilation of Data for Priority Organic Pollutants for Derivation of Soil Guideline Values	Environment Agency	Science Report SC050021/SR7	2008
The UK Approach for Evaluating Human Health Risks from Petroleum Hydrocarbons in Soil	Environment Agency	Report P5-080/TR3	2005
Review of the Fate and Transport of Selected Contaminants in the Soil Environment	Environment Agency	Draft Technical Report P5-079/TR1	2003
Guidance on Comparing Soil Contamination Data with a Critical Concentration	CL:AIRE/ CIEH		May 2008
Industry Profiles	DEFRA		Various dates
Radon: guidance on protective measures for new developments	BRE	BRE 211	November 2007
<u>Contaminated Land management manual</u>	<u>LQM</u>	<u>LQM2000</u>	<u>2000</u>
Assessing risks posed by hazardous ground gases to buildings (revised)	CIRIA	CIRIA C665	December 2007
<u>Code of practice for the design of protective measures for methane and carbon dioxide ground gas for new buildings</u>	<u>BSI</u>	<u>BS 8485:2015</u>	<u>2015</u>
Using Soil Guideline Values		Science Report SC050021/SGV Introduction	March 2009
Soil guideline values for inorganic arsenic	Environment Agency	SC050021/ arsenic SGV	May 2009
Soil guideline values for mercury	Environment Agency	SC050021/ mercury SGV	April 2009
Soil guideline values for selenium	Environment Agency	SC050021/ selenium SGV	April 2009
Soil guideline values for benzene	Environment Agency	SC050021/ benzene SGV	April 2009
Soil guideline values for toluene	Environment Agency	SC050021/ toluene SGV	April 2009
Soil guideline values for ethylbenzene	Environment Agency	SC050021/	April 2009

		ethylbenzene SGV	
Soil guideline values for xylenes	Environment Agency	SC050021	April 2009
Supplementary information for the derivation of for inorganic arsenic	Environment Agency	SC050021	May 2009
Supplementary information for the derivation of for mercury	Environment Agency	SC050021	April 2009
Supplementary information for the derivation of for selenium	Environment Agency	SC050021	April 2009
Supplementary information for the derivation of for benzene	Environment Agency	SC050021	April 2009
Supplementary information for the derivation of for toluene	Environment Agency	SC050021	April 2009
Supplementary information for the derivation of for ethylbenzene	Environment Agency	SC050021	April 2009
Supplementary information for the derivation of for xylenes	Environment Agency	SC050021	April 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Inorganic Arsenic	Environment Agency	SC050021/Tox 1	May 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Mercury	Environment Agency	SC050021	April 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Selenium	Environment Agency	SC050021	April 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Benzene	Environment Agency	SC050021	April 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Toluene	Environment Agency	SC050021	April 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Ethylbenzene	Environment Agency	SC050021	April 2009
Contaminants in soil: updated collation of toxicological data and intake values for humans : Xylenes	Environment Agency	SC050021	April 2009
Reclamation of Contaminated Land	Wiley		2004
Policy and Practice For The Protection of Groundwater	Environment Agency		1999
<u>CIRIA Special Publication 102 - Remedial Treatment for Contaminated Land - Volume II: Decommissioning, Decontamination and Demolition</u>	CIRIA	SP102	January 1995
<u>Guidance on the Safe Development of Housing on Land affected by Contamination</u>	Environment Agency	R&D Publication 66	2008
ProUCL User Guide and Technical Guide	USEPA	-	
Guidance on the assessment of and monitoring of natural attenuation of contaminants in groundwater	Environment Agency	R&D Publication 95	2000
The standard penetration test in insensitive clays and soft rocks	Proceedings of the European Symposium on Penetration Testing in the UK	-	1988
Trenching practice. 2nd edition	CIRIA	R97	2001
Desiccation in clay soils	BRE	412	February 1996
Methods of test for soils for civil engineering purposes	BSI	BS1377 (Parts 1 to 9)	1990
Eurocode 7: Geotechnical Design – Part 1: General Rules British	BSI	BS EN 1997-1	2004
Eurocode 7: Geotechnical Design – Part 2: Ground Investigation and Testing	BSI	BS EN 1997-2	2007
Geotechnical investigation and testing. Field testing. Electrical cone and piezocone penetration test	BSI	BS EN ISO 22476-1	2012
Geotechnical Investigation and Testing – Field Testing Part 2: Dynamic Probing	BSI	BS EN ISO 22476-2+A1	2011
Geotechnical Investigation and Testing – Field Testing Part 3: Standard Penetration Test	BSI	BS EN ISO 22476-3+A1	2011
Geotechnical investigation and testing. Field testing- Ménard pressuremeter test	BSI	BS EN ISO 22476-4	2012
Geotechnical investigation and testing. Field testing - Flexible dilatometer test	BSI	BS EN ISO 22476-5	2012
Geotechnical investigation and testing. Field testing - Borehole jack test	BSI	BS EN ISO 22476-7	2012
Geotechnical investigation and testing. Field testing – Flat dilatometer test	BSI	BS EN ISO 22476-11	2006
Geotechnical investigation and testing. Field testing - Mechanical cone penetration test (CPTM)	BSI	BS EN ISO 22476-12	2009

The standard penetration test (SPT): methods and use	CIRIA	R143	1995
Low-rise Buildings on Shrinkable Clay	BRE	BRE Digest 240 and 241	1993
Settlement of structures on clay soils	CIRIA	SP27	1983
Piled foundations in weak rock	CIRIA	R181	1999
Theoretical soil mechanics	Terzaghi	-	1943
Soils for civil engineering purposes	BSI	BS 1337	1990
Groundwater Control – Design and Practice	CIRIA	C515	2000
Trees in relation to design, demolition and construction. Recommendations	BSI	BS 5837	2012
Workmanship on Building Sites	BSI	BS 8000	Various
ICRCL 61/84 Notes on the fire hazards of contaminated land	ICRCL	61/84	1986
Soakaway Design	BRE	Digest 365	1991
Design guidance for road pavement foundations (draft HD 25) (Revision 1)	Highways Agency	Draft HD25	2006
Building Regulations Approved Documents	HM Government	Various	2013



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Date of Map: 2001

Site Name: Spring Street
Sawmills

Scale: 1:3,000 at A4



APPENDIX B: LEGISLATIVE CONTEXT

LEGISLATION OVERVIEW

This report includes hazard identification and environmental risk assessment in line with the risk-based methods referred to in relevant UK legislation and guidance. Government environmental policy is based upon a "suitable for use approach". When considering the current use of land, Part IIA of the Environment Protection Act 1990 (EPA 1990) provides the regulatory regime, which was introduced by Section 57 of the Environment Act 1995, which came into force in England on 1 April 2000. The main objective of introducing the Part IIA regime is to provide an improved system for the identification and remediation of land where contamination is causing unacceptable risks to human health or the wider environment given the current use and circumstances of the land.

Part IIA provides a statutory definition of contaminated land under Section 78A(2) as:

"any land which appears to the Local Authority in whose area it is situated to be in such a condition, by reason of substances in, on, or under the land, that:

Significant harm is being caused or there is a significant possibility of such harm being caused; or Pollution of controlled waters is being, or is likely to be, caused."

Harm is defined under section 78A of the Environmental Protection Act as meaning 'harm to the health of living organisms or other interference with the ecological systems of which they form part and, in the case of man, includes harm to his property'. Part IIA provides a statutory definition of the pollution of controlled waters under Section 78A(9) as "the entry into controlled waters of any poisonous, noxious or polluting matter or any solid waste matter".

Types of harm are related to specific receptors in order to determine whether they can be regarded as "significant harm" or "significant possibility of significant harm", as defined in Clause 4 of the DEFRA publication 'Environmental Protection Act 1990: Part 2A Contaminated Land Statutory Guidance', which is presented hereunder:

Table 1: Categories Of Significant Harm and Significant Possibility of Significant Harm for Each Receptor

Type of Receptor		Description of harm to that type of receptor that is to be regarded as:"	
		Significant Harm	Significant Possibility of Significant Harm
1	Human beings	Death; life threatening diseases (e.g. cancers); other diseases likely to have serious impacts on health; serious injury; birth defects; and impairment of reproductive functions Physical injury; gastrointestinal disturbances; respiratory tract effects; cardio-vascular effects; central nervous system effects; skin ailments; effects on organs such as the liver or kidneys; or a wide range of other health impacts. Death, disease, serious injury, genetic mutation, birth defects or the impairment of reproductive functions. For these purposes, disease is to be taken to mean an unhealthy condition of the body or a part of it and can include, for example, cancer, liver dysfunction or extensive skin ailments. Mental dysfunction is included only insofar as it is attributable to the effects of a pollutant on the body of the person concerned.	-
2	Any ecological system, or living organism forming part of such a system, within a location which is: - a site of special scientific interest (under section 28 of the Wildlife and Countryside Act 1981) - a national nature reserve (under s.35 of the 1981 Act) - a marine nature reserve (under s.36 of the 1981 Act) - an area of special protection for birds (under s.3 of the 1981 Act) - a "European site" within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010 - any habitat or site afforded policy protection under paragraph 6 of Planning Policy Statement (PPS 9) on nature conservation (i.e. candidate Special Areas of Conservation, potential Special Protection Areas and listed Ramsar sites); or - any nature reserve established under section 21 of the National Parks and Access to the Countryside Act 1949. and Access to the Countryside Act 1949.	The following types of harm should be considered to be significant harm: - harm which results in an irreversible adverse change, or in some other substantial adverse change, in the functioning of the ecological system within any substantial part of that location; or - harm which significantly affects any species of special interest within that location and which endangers the long-term maintenance of the population of that species at that location. In the case of European sites, harm should also be considered to be significant harm if it endangers the favourable conservation status of natural habitats at such locations or species typically found there. In deciding what constitutes such harm, the local authority should have regard to the advice of Natural England and to the requirements of the Conservation of Habitats and Species Regulations 2010.	Conditions would exist for considering that a significant possibility of significant harm exists to a relevant ecological receptor where the local authority considers that: - significant harm of that description is more likely than not to result from the contaminant linkage in question; or - there is a reasonable possibility of significant harm of that description being caused, and if that harm were to occur, it would result in such a degree of damage to features of special interest at the location in question that they would be beyond any practicable possibility of restoration.
3	Property in the form of: - crops, including timber; - produce grown domestically, or on allotments, for consumption; - livestock; - other owned or domesticated animals; - wild animals which are the subject of shooting or fishing rights.	For crops, a substantial diminution in yield or other substantial loss in their value resulting from death, disease or other physical damage. For domestic pets, death, serious disease or serious physical damage. For other property in this category, a substantial loss in its value resulting from death, disease or other serious physical damage. The local authority should regard a substantial loss in value as occurring only when a substantial proportion of the animals or crops are dead or otherwise no longer fit for their intended purpose. Food should be regarded as being no longer fit for purpose when it fails to comply with the provisions of the Food Safety Act 1990. Where a diminution in yield or loss in value is caused by a contaminant linkage, a 20% diminution or loss should be regarded as a benchmark for what constitutes a substantial diminution or loss.	Conditions would exist for considering that a significant possibility of significant harm exists to the relevant types of receptor where the local authority considers that significant harm is more likely than not to result from the contaminant linkage in question, taking into account relevant information for that type of contaminant linkage, particularly in relation to the ecotoxicological effects of the contaminant.
4	Property in the form of buildings. For this purpose, "building" means any structure or erection, and any part of a building including any part below ground level, but does not include plant or machinery comprised in a building, or buried services such as sewers, water pipes or electricity cables.	Structural failure, substantial damage or substantial interference with any right of occupation. The local authority should regard substantial damage or substantial interference as occurring when any part of the building ceases to be capable of being used for the purpose for which it is or was intended. In the case of a scheduled Ancient Monument, substantial damage should also be regarded as occurring when the damage significantly impairs the historic, architectural, traditional, artistic or archaeological interest by reason of which the monument was scheduled.	Conditions would exist for considering that a significant possibility of significant harm exists to the relevant types of receptor where the local authority considers that significant harm is more likely than not to result from the contaminant linkage in question during the expected economic life of the building (or in the case of a scheduled Ancient Monument the foreseeable future), taking into account relevant information for that type of contaminant linkage.

For human beings and controlled waters there are four categories of harm, given hereunder:

Table 2: Categories Of Harm for Human Beings and Controlled Waters

Category	Description of harm to that type of receptor that is to be regarded as:"	
	Human Beings	Controlled Waters
1	The local authority should assume that a significant possibility of significant harm exists in any case where it considers there is an unacceptably high probability, supported by robust science based evidence, that significant harm would occur if no action is taken to stop it. For the purposes of this Guidance, these are referred to as "Category 1: Human Health" cases. Land should be deemed to be a Category 1: Human Health case where: (a) the authority is aware that similar land or situations are known, or are strongly suspected on the basis of robust evidence, to have caused such harm before in the United Kingdom or elsewhere; or (b) the authority is aware that similar degrees of exposure (via any medium) to the contaminant(s) in question are known, or strongly suspected on the basis of robust evidence, to have caused such harm before in the United Kingdom or elsewhere; (c) the authority considers that significant harm may already have been caused by contaminants in, on or under the land, and that there is an unacceptable risk that it might continue or occur again if no action is taken. Among other things, the authority may decide to determine the land on these grounds if it considers that it is likely that significant harm is being caused, but it considers either: (i) that there is insufficient evidence to be sure of meeting the "balance of probability" test for demonstrating that significant harm is being caused; or (ii) that the time needed to demonstrate such a level of probability would cause unreasonable delay, cost, or disruption and stress to affected people particularly in cases involving residential properties.	This covers land where the authority considers that there is a strong and compelling case for considering that a significant possibility of significant pollution of controlled waters exists. In particular this would include cases where there is robust science-based evidence for considering that it is likely that high impact pollution (such as the pollution described in paragraph 4.38) would occur if nothing were done to stop it.
2	For land that cannot be placed into Categories 1 or 4, the local authority should decide whether the land should be placed into either: (a) Category 2: Human Health, in which case the land would be capable of being determined as contaminated land on grounds of significant possibility of significant harm to human health; or (b) Category 3: Human Health, in which case the land would not be capable of being determined on such grounds. The local authority should consider this decision in the context of the broad objectives of the regime and of the Government's policy as set out in Section 1. It should also be mindful of the fact that the decision is a positive legal test, meaning that the starting assumption should be that land does not pose a significant possibility of significant harm unless there is reason to consider otherwise. The authority should then, in accordance with paragraphs 4.26 to 4.29 below, decide which of the following two categories the land falls into:	This covers land where: (i) the authority considers that the strength of evidence to put the land into Category 1 does not exist; but (ii) nonetheless, on the basis of the available scientific evidence and expert opinion, the authority considers that the risks posed by the land are of sufficient concern that the land should be considered to pose a significant possibility of significant pollution of controlled waters on a precautionary basis, with all that this might involve (e.g. likely remediation requirements, and the benefits, costs and other impacts of regulatory intervention). Among other things, this category might include land where there is a relatively low likelihood that the most serious types of significant pollution might occur.
3	(a) Category 2: Human Health. Land should be placed into Category 2 if the authority concludes, on the basis that there is a strong case for considering that the risks from the land are of sufficient concern, that the land poses a significant possibility of significant harm, with all that this might involve and having regard to Section 1. Category 2 may include land where there is little or no direct evidence that similar land, situations or levels of exposure have caused harm before, but nonetheless the authority considers on the basis of the available evidence, including expert opinion, that there is a strong case for taking action under Part 2A on a precautionary basis. (b) Category 3: Human Health. Land should be placed into Category 3 if the authority concludes that the strong case described in 4.25(a) does not exist, and therefore the legal test for significant possibility of significant harm is not met. Category 3 may include land where the risks are not low, but nonetheless the authority considers that regulatory intervention under Part 2A is not warranted. This recognises that placing land in Category 3 would not stop others, such as the owner or occupier of the land, from taking action to reduce risks outside of the Part 2A regime if they choose. The authority should consider making available the results of its inspection and risk assessment to the owners/occupiers of Category 3 land.	This covers land where the authority concludes that the risks are such that (whilst the authority and others might prefer they did not exist) the tests set out in Categories 1 and 2 above are not met, and therefore regulatory intervention under Part 2A is not warranted. This category should include land where the authority considers that it is very unlikely that serious pollution would occur; or where there is a low likelihood that less serious types of significant pollution might occur.
4	The local authority should not assume that land poses a significant possibility of significant harm if it considers that there is no risk or that the level of risk posed is low. For the purposes of this Guidance, such land is referred to as a "Category 4: Human Health" case. The authority may decide that the land is a Category 4: Human Health case as soon as it considers it has evidence to this effect, and this may happen at any stage during risk assessment including the early stages. The local authority should consider that the following types of land should be placed into Category 4: Human Health: (a) Land where no relevant contaminant linkage has been established. (b) Land where there are only normal levels of contaminants in soil. (c) Land that has been excluded from the need for further inspection and assessment because contaminant levels do not exceed relevant generic assessment criteria. (d) Land where estimated levels of exposure to contaminants in soil are likely to form only a small proportion of what a receptor might be exposed to anyway through other sources of environmental exposure (e.g. in relation to average estimated national levels of exposure to substances commonly found in the environment, to which receptors are likely to be exposed in the normal course of their lives). The local authority may consider that land other than the types described above should be placed into Category 4: Human Health if following a detailed quantitative risk assessment it is satisfied that the level of risk posed is sufficiently low. Local authorities may decide that particular land apparently matching the descriptions above immediately above poses sufficient risk to human health to fall into Categories other than Category 4. However, such cases are likely to be very unusual and the authority should take particular care to explain why the decision has been taken, and to ensure that it is supported by robust evidence.	This covers land where the authority concludes that there is no risk, or that the level of risk posed is low. In particular, the authority should consider that this is the case where: (a) no contaminant linkage has been established in which controlled waters are the receptor in the linkage; or (b) the possibility only relates to types of pollution described in paragraph 4.40 above (i.e. types of pollution that should not be considered to be significant pollution); or (c) the possibility of water pollution similar to that which might be caused by "background" contamination.

Category 1 or 2 encompass land which is capable of being determined as contaminated land on grounds of significant possibility of significant harm to human health.

The guidance defines what 'normal' levels of contamination is and that a site should not be classified as 'contaminated land'.

'Normal' levels of contamination is defined as:

- (a) The natural presence of contaminants (e.g. caused by soil formation processes and underlying geology) at levels that might reasonably be considered typical in a given area and have not been shown to pose an unacceptable risk to health or the environment.
- (b) The presence of contaminants caused by low level diffuse pollution, and common human activity other than specific industrial processes. For example, this would include diffuse pollution caused by historic use of leaded petrol and the presence of benzo(a)pyrene from vehicle exhausts, and the spreading of domestic ash in gardens at levels that might reasonably be considered typical.

The UK regulatory authorities have adopted the widely recognised pollutant linkage concept for assessing risks from land contamination. However, the scenarios under which significant harm may occur are often largely defined by the site conditions and the receptor sensitivity. The concept of suitability for use is adopted to ensure that the risk management process addresses the site-specific conditions and that any remediation undertaken reduces risks to an acceptable level. To meet requirements under Part IIA the site should be suitable for its current use, including use for which a planning permission is already held.

Part IIA of The Environmental Protection Act 1990 is supported by the DEFRA publication of April 2012 'Environmental Protection Act 1990: Part 2A Contaminated Land Statutory Guidance' (this replaces DETR Circular 06/2006), which defines the duties of Local Authorities in dealing with it. Part IIA places contaminated land responsibility as a part of planning and redevelopment process rather than Local Authority direct action except in situations of very high pollution risk. In the planning process guidance is provided by the National Planning Policy Framework which requires that a site which has been developed shall not be capable of being determined "contaminated land" under Part IIA.

The criteria for assessing levels of pollutants and hence determining whether a site represents a hazard are based on a range of techniques, models and guidance. Within this context it is relevant to note that Government objectives are:

- (a) To identify and remove unacceptable risks to human health and the environment;
- (b) To seek to ensure that contaminated land is made suitable for its current use;
- (c) To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.

These three objectives underlie the "suitable for use" approach to remediation of contaminated land. The "suitable for use" approach focuses on the risks caused by land contamination. The approach recognises that the risks presented by any given level of contamination will vary greatly according to the use of the land and a wide range of other factors, such as the underlying geology of the site. Risks therefore should be assessed on a site-by-site basis.

The "suitable for use" approach comprises of three elements:

- (a) ensuring that land is suitable for its current use
- (b) ensuring that land is made suitable for any new use, as planning permission is given for that new use
- (c) limiting requirements for remediation to the work necessary to prevent unacceptable risks to human health or the environment in relation to the current use or future use of the land for which planning permission is being sought

The mere presence of pollutants does not therefore necessarily warrant action, and consideration must be given to the scale of risk involved for the use that the site has, and will have in the future.

Legislation in Scotland, Northern Ireland and Wales

Northern Ireland

The Northern Ireland Assembly was established as part of the Belfast Agreement and it is the prime source of authority for all devolved/transferred matters (including environment and planning) and has full legislative and executive authority. Devolution powers became the responsibility of the Northern Ireland Assembly on the 2nd December 1999. The Executive was subsequently suspended and Direct Rule restored on the 11th February 2000. Restoration of devolution subsequently took place on 30th May 2000. Twenty-four hour suspensions also took place in August and September 2001.

On the 14th October 2002 the Assembly was again suspended and then formally dissolved on the 28th April 2003. Subsequently the Assembly was restored to a state of suspension following elections in November 2003 with the Assembly finally being restored on 8th May 2007.

The Environment and Heritage Service (EHS) is the largest Agency within the Department of the Environment (DOE NI), one of the eleven Northern Ireland Departments created in 1999. The EHS takes the lead in advising on, and in implementing, the Government's environmental policy and strategy in Northern Ireland.

The Planning Service, another Agency which comes under the umbrella of the DOE NI, is responsible for developing and implementing Government planning policies and development plans in Northern Ireland.

Part 3 of the Waste and Contaminated Land (Northern Ireland) Order 1997 contains the main legal provisions for the introduction of a contaminated land regime in Northern Ireland. The Order was enacted in 1997 but the regime is not yet in operation. The provisions within Part 3 are virtually identical to those provided by part 2A and would establish a regime whereby local authorities are under a duty to investigate and identify contaminated land and identify those responsible for its remediation.

In terms of provision of technical guidance for regulators to assist them in the determination of contaminated land the DOE NI references the DEFRA SGV Task Force and CLEA publications.

The primary legislation governing planning in Northern Ireland is the Planning (Northern Ireland) Order 1991 (as amended). This is backed up by secondary legislation and planning policy, including planning policy statements (PPSs) and area plans. However there is currently no specific PPS addressing development on potentially contaminated land.

Planning applications are determined by the Planning Service with local councils, along with other government departments, acting as consultees to the approval process. Despite the lack of guidance the Planning Service, in considering planning applications for brownfield sites, will impose conditions for site investigation and remediation that broadly mirror the requirements of part 3/Part 2A.

Wales

Both the Environment Protection Act 1990 and the Environment Act 1995 were issued on a UK wide basis, so the same principles of Part 2A legislation are applicable. In July 1997 the UK Government published a white paper outlining proposals for devolution. In Wales a referendum was held in September 1997 and the result led to the Government of Wales Act 1998 being issued thus establishing the National Assembly for Wales (NAW) with powers being transferred on 1st July 1999.

Since this time subordinate legislation has been introduced in Wales that details how the provisions of an Act of Parliament will apply, hence the reason for different effects in Wales to that of England.

The elected Assembly Members effectively delegated their powers for implementation of policies and legislation to the Welsh Assembly Government (WAG). One of the subject areas within WAG is Environment Planning & Countryside, which covers the policies and subordinate legislation relevant to land contamination. The preliminary legislation was The Contaminated Land (Wales) Regulations 2001 Welsh Statutory Instrument 2001 No. 2197 (W.157) which came into force on 1st July 2001. This has now been revoked and replaced by The Contaminated Land (Wales) Regulations 2006 Welsh Statutory Instrument 2006 No. 2989 (W.278) which came into force on 10th December 2006. These include the changes for appeals on Remediation Notices, which are required to be made to NAW. The Radioactive Contaminated Land (Modification of Enactments) (Wales) Regulations 2006 were implemented at the same time.

Current Statutory Guidance relevant to Wales is the 'Contaminated Land Statutory Guidance – 2012' (2012) issued by the Welsh Government. This comprises Guidance previously issued in November 2001 and further guidance to accompany other modifications such as the introduction of radioactivity. The principle regulators of the Part 2A process are Environment Agency Wales and as appropriate the local authority responsible for the site in question. As in England the use of the CLEA v1.06 model and the relevant SGV and TOX reports are applicable in Wales.

In respect of Planning the circular 022/87 (WO) prepared by DETR (Department of Environment, Transport and the Regions) on Development of Contaminated Land remains applicable for outlining the requirements associated with new developments, including change of use. The document states that contamination is a material planning consideration, but is ambiguous in a number of areas. It does however indicate that an investigation will normally be required where the previous history of the site suggests contamination.

Planning Policy Wales (2002) outlines that the physical constraints on the land are to be taken into account at all stages of the planning process and this is in the context of land instability and land contamination. It also explains that LPA's (Local Planning Authorities) should be aware of the requirements of Part 2A and ensure that their policies and decisions are consistent with it. This implies that the methods used in assessing land for Part 2A purposes should be applied within the planning regime. Accordingly the concept of risk assessment as a tool to help direct development on a suitable for use basis is appropriate as in England.

NPPF does not apply in Wales, however it may be referred to as good practice, though this may be open to challenge. In Wales Technical Advice Notes (TAN) are used as Planning Policy Statements and currently there is no TAN applicable to land contamination in Wales. WAG is considering the preparation of a TAN and it is understood that this will look at the suitability of PPS23 for Wales, though no timetable for delivering this has been made.

Land Contamination: A Guide for Developers prepared on behalf of the Welsh Local Government Association, Environment Agency Wales & WAG was issued in July 2006. Whilst this is not statutory guidance, it helps confirm good practice and broadly details the risk assessment process in line with the Guidance on 'Land contamination risk management (LCRM)'

Scotland

Since the passing of the Scotland Act and the official convening of the Scottish Parliament and the Scottish Executive on the 1st July 1999 devolved matters, including the environment and planning, have been the responsibility of Scottish Ministers.

There are two regulatory enforcement bodies in Scotland with duties and powers in terms of identification and remediation of contaminated land and development of brownfield sites; Local Authorities and the Scottish Environment Protection Agency (SEPA) which was established in 1996.

The current structure of local government in Scotland was established by the Local Government (Scotland) Act 1994. Since the passing of the Act Scotland has been divided into 29 unitary authorities and 3 island authorities. It is the responsibility of the Scottish Executive to implement Part 2A of the Environmental Protection Act, 1990. Scottish Ministers therefore implemented.

The Contaminated Land (Scotland) Regulations 2000 (SI2000/178) (the 2000 Regulations) with accompanying statutory guidance on the 14th July 2000. The 2000 Regulations were replaced on the 1st April 2006 by the Contaminated Land (Scotland) 2005 Regulations (the 2005 Regulations). The 2005 Regulations amended Part 2A of the Environmental Protection Act 1990 and the 2000 Regulations in the light of the Water Environment and Water Services (Scotland) Act 2003. Guidance on the 2005 Regulations was published in June 2006 in the form of Paper SE/2006/44 (Statutory Guidance; Edition 2) by the Scottish Executive. The document replaces in its entirety the guidance issued July 2000.

Contaminated land was defined in the 2000 Regulations where pollution of controlled waters is being, or is likely to be caused. This meant that any degree of pollution of controlled waters could have resulted in the land being designated as contaminated. The 2005 Regulations addressed the anomaly whereby trivial amounts of pollution resulted in land being designated as contaminated by introducing a requirement that pollution be "significant" or likely to be "significant" in relation to the water environment.

Unlike England and Wales the 2005 Regulations do not include radioactive contamination. The Radioactive Contaminated Land (Scotland) Regulations 2007 came into force in Scotland on the 30th October 2007. The Regulations make provision for Part 2A to have effect with modifications for the purpose of the identification and remediation of radioactive contaminated land.

When brownfield or contaminated sites are being developed, Local Authorities require that the need for remediation is determined using guidance provided by Planning Advice Note (PAN) 33. PAN 33 uses the Suitable for Use Approach. The approach focuses on the risks caused by land contamination and recognises that the risks presented by any given level of contamination will vary greatly according to the use of the land and a wide range of other factors such as the underlying geology.

The Suitable for Use Approach comprises three elements:

- Ensuring that land is suitable for its current use;
- Ensuring that land is made suitable for any new use as planning permission is given for that use; and
- Limiting the requirements for remediation to the work necessary to prevent unacceptable risks to human health or the environment in relation to the current use or future use for which planning permission is being sought.



APPENDIX C: RISK ASSESSMENT METHODOLOGIES

RISK ASSESSMENT METHODOLOGY

The methods applied by **DEMETER ENVIRONMENTAL Ltd** in the assessment of risks to receptors from soil, water and gas data, are presented hereunder:

LEGISLATION OVERVIEW:

The legislative background to risk assessment is discussed in the legislative Appendix B.

RISK ASSESSMENT METHODOLOGY

Current practice recommends that the determination of potential liabilities that could arise from land contamination be carried out using the process of risk assessment, whereby "risk" is defined as:

- (a) The probability, or frequency, or occurrence of a defined hazard; and
- (b) The magnitude (including the seriousness) of the consequences."

The UK's approach to the assessment of environmental risk is set out in by the Department of the Environment (2000) publication "A Guide to Risk Assessment and Risk Management for Environmental Protection." This established an iterative, systematic staged process which comprises:

- (a) Hazard identification
- (b) Hazard assessment
- (c) Risk estimation
- (d) Risk evaluation
- (e) Risk Assessment

At each stage during the investigation process the above steps are repeated as more detailed information becomes available for the site.

The Guidance on 'Land contamination risk management (LCRM), guidance published by the the Environment Agency (EA) outlines a tiered approach to the assessment of risks posed by contaminated land, as summarised hereunder:

Tier 1: Preliminary Risk Assessment

A Preliminary Risk Assessment is usually undertaken as part of a desk study, outlines potential risks posed by potential contamination to all receptors by defining plausible "pollution linkages" and developing a preliminary conceptual model (PCM). The purpose of this model is to define all possible complete pollution linkages, where the requisite source – pathway – target elements are present, and these elements being defined as:

- a contaminant (source) is a hazardous substance or agent, present at levels that have the potential to cause harm or damage a receptor
- a pathway is the means by or through which a contaminant comes into contact with, or otherwise affects, the receptor
- a receptor (target) is an entity (human being, aquatic environment, flora and fauna etc) that is vulnerable to the adverse effects of the contaminant

This relationship is termed a "pollution linkage". It should be recognised that for a health or environmental risk to exist, all three elements of the relationship or linkage must be present, i.e.

- if there is no contaminant, or contaminant present at levels below those considered to be harmful or damaging to a receptor, then there can be no adverse effect on a receptor
- if there is no receptor present that can be adversely affected by a contaminant, no harm or damage can arise
- even where both a contaminant and a receptor are present, no harm or damage will occur if there is no pathway by or through which a linkage between the two can be established

The absence of one or more of each component (source, pathway, receptor) would prevent a pollutant linkage being established and there would be no significant environmental risk.

Potential contaminants of concern are identified with the aide of the Environment Agency and NHBC publication 'Guidance for the Safe Development of Housing on Land Affected by Contamination', the Department of Environment Industry Profiles and the now withdrawn CLEA CLR 8, which consolidated the information Industry Profiles into a tabular format.

The PCM is subject to continual refinement as additional data becomes available. As part of a Phase I Investigation (Desk Study and site walk over) a PCM is formed. Based on the PCM, potential pollutant linkages can be assessed. If the PCM and hazard assessment indicate that a pollution linkage is not of significance then no further assessment or action is required due to this linkage. For each significant and possible linkage a risk assessment is carried out. The linkages which potentially pose significant risks may require a variety of responses ranging from immediate remedial action or risk management or, more commonly, further investigation and risk assessment. This next stage is usually termed a Phase II Main Site Investigation and should provide additional data to allow refinement of the PCM and assess the level of risk from each pollutant linkage. The risk assessment will usually include a Tier 2 Generic Quantitative Risk Assessment and / or, if necessary, a Tier 3 Detailed Quantitative Risk Assessment.

The criteria used for a Tier 1 risk assessment are broadly based on those presented in Section 6.3 of the CIRIA Report 'Contaminated Land Risk Assessment: A Guide to Good Practice' (CIRIA Report C552) and Section 1.7 of Guidance on the Safe Development of Housing on Land affected by Contamination. The consequence of the risk is classified according to the criteria in Table A below:

Assessment of Sensitivity of Water Resources

The criteria used to determine the sensitivity of a water resource is given hereunder:

Groundwater

Sensitivity Assessment	Standard Response	Implications/need for further work (subject to nature of source and pathway)
H1 (Very high)	Highly vulnerable aquifer, actively used in vicinity of site with short travel times to sources of supply or sensitive watercourses. Likely to be within an inner or outer groundwater protection zone (Zones I or II under EA protection policy). All contaminant releases to the ground environment of concern.	Extensive groundwater and soil clean-up or removal is likely to be needed if a source and pathway exist. Potential for major on-site and off-site liabilities. Further, detailed risk assessment essential and is likely to be required by the Regulators. Could be long-term residual liabilities with major cost implications and potential high risk of prosecution.
H2 (High)	Major or minor vulnerable aquifer with probable use nearby (either direct abstraction or baseflow to sensitive watercourses and springs). Likely to be within Outer or Source Catchment protection zones (Zones II or III). Most contaminant releases to the ground environment of concern.	Significant groundwater remediation measures may be required, after detailed risk assessment, which is likely to be required by the Regulators. Soil decontamination or isolation probably necessary. Potential for significant on-site and off-site liabilities, including treatment and/or replacement of local potable water supplies. Substantial cost implications and potential moderate/high risk of prosecution.
M1 (Moderately high)	Recognised major or minor aquifer, moderately vulnerable, with probable use (either direct or via baseflow to a sensitive watercourse). Within formal protection zone or catchment of authorised abstractions for potable or other high quality uses. Minor, short-term releases of contaminants may be tolerable.	Following risk assessment, soil decontamination or isolation may be required. Localised groundwater clean-up may be needed but large scale clean-up unlikely unless source is substantial and toxic. Possible off-site liabilities such as replacement/treatment of local potable water supplies. Moderate cost implications and potential moderate risk of prosecution.
M2 (Moderate)	Minor aquifer, low to moderately vulnerable, but with possible uses in general area, particularly for domestic supplies. May provide pathway to surface water.	Risk assessment may indicate need for localised clean up/isolation of soil and groundwater only, but may be some off-site liabilities e.g. local potable water supplies. Moderate to low cost implications. Potential prosecution less likely.
L1 (Low)	Permeable strata/minor aquifer near surface, but no apparent use and low vulnerability (may also be a significant aquifer but downgraded by long-term/permanent degradation of water quality). May provide pathway to surface watercourse at distance.	Localised clean-up/isolation of soil and groundwater only. Unlikely to be significant off-site liabilities or action by statutory authorities with respect to groundwater. Low cost implications.
L2 (Very low)	Not a recognised aquifer, but strata beneath site may retain a small amount of contaminated liquid but there is likely to be limited vertical penetration. High potential for surface runoff or ponding.	Clean-up/isolation of soil and contained groundwater only, in immediate vicinity of release. Unlikely to be off-site liabilities or action by statutory authorities with respect to groundwater. Low cost implications.

Surface Water (exc coastal waters)

Sensitivity Assessment	Standard Response	Implications/need for further work (subject to nature of source and pathway and no short circuiting by artificial drainage systems)
H1 (Very high)	High quality watercourse (GQA A or B) within close proximity (less than 250m) of site or with potential for rapid transmission of pollutants to that watercourse via a fissured aquifer. Or interconnected unclassified drain or stream.	Potential for major pollution incident with fish kills, risk to river users etc. Major cost implications for remediation measures and with respect to penalties on prosecution. Potential for major adverse publicity.
H2 (High)	Site within catchment and reasonable proximity (less than 500m) of high quality watercourse (GQA A/B) or with potential transmission of pollutants via baseflow from an aquifer with little subsurface attenuation or via an interconnected unclassified drain or stream.	Potential for significant pollution incident that requires remedial measures and likely to involve a prosecution and adverse publicity. Substantial cost implications.
M1 (Moderately high)	Site within catchment and reasonable proximity (less than 500m) of a moderate quality watercourse (GQA C/D) or 500-1000m of a high quality watercourse (GQA A/B). Also where there is potential transmission of pollutants via baseflow with little subsurface attenuation or via an interconnected unclassified drain or stream.	Potential for significant pollution incident that requires remediation measures. Possible prosecution, particularly if contamination is likely to be visible or result in public complaints.
M2 (Moderate)	Site within catchment of and relatively close (less than 1000m) to moderate or poor quality (GQA C to F) watercourse that may be subject to planned improvement by attainment of surface water quality objectives. May be potential for transmission of pollutants via baseflow from a highly permeable formation.	Minor incidents are unlikely to attract third party liabilities, but action by statutory authorities likely if contamination is visible or repeated.
L1 (Low)	Within catchment of and over 250m from generally poor quality watercourse (GQA E or F) that is unlikely to improved by current or foreseeable surface water quality objectives or at distance (over 1000m) from a good quality watercourse with no interconnecting drains or baseflow from fissured strata.	Unlikely to be third party liabilities or action from statutory authorities from surface water viewpoint.
L2 (Very low)	No surface water within general area of the site (at least 250m) or closed drainage within site. Little or no potential for significant transmission via baseflow and no interconnecting drains.	Liabilities restricted to site itself (localised soil contamination or ponding) or associated with groundwater.

Coastal Waters

Sensitivity Assessment	Standard Response	Implications/need for further work (subject to nature of source and pathway and no short circuiting by artificial drainage systems)
H1 (Very high)	Within 100m of a sensitive coastal water, that is, a recognised bathing water, a "more sensitive area" (as defined under the Urban Wastewater Treatment Directive) or a marine SSSI or at a greater distance but with a direct connection via a stream or a highly fissured aquifer to such a coastal water with the potential for rapid flow to that water.	Potential for major environmental health risks and ecological damage. Probability of high remedial costs, prosecution and adverse publicity.
H2 (High)	As above, within 250m or with a relatively rapid route of transmission or within 100m of a "less sensitive area".	
M1 (Moderately high)	Within 500m of a bathing water or a defined sensitive area (see above); with possibility of diffuse flow via groundwater seepages at coastline or with connection via nearby watercourses.	LESS DATA AVAILABLE FOR COASTAL SITES TO GIVE GENERALISED ASSESSMENTS OF POTENTIAL LIABILITIES.
M2 (Moderate)	Within 500m of a coastal water (undefined), with possibility of diffuse flow via groundwater seepages at coastline or with connection via nearby watercourses.	
L1 (Low)	No coastline nearby (within 1km), but with possibility of diffuse groundwater seepages at coastline or connection via nearby watercourses.	Liabilities initially associated with watercourses or groundwaters.
L2 (Very low)	No coastline nearby (within 1km) and/or no direct connection via surface or ground water.	No liabilities likely.

Artificial Drainage System

Sensitivity Assessment	Standard Response	Implications/need for further work (subject to nature of source and pathway and no short circuiting by artificial drainage systems)
H1 (Very high)	Extensive land use/industrial history, successive building development. Steep surface slopes (rapid travel times with little opportunity for dilution/interception facilities) or close proximity (within 250m) to surface watercourses or high sensitivity groundwater. Former mining areas where subsurface mine drains are present or suspected. Detailed drainage records absent.	Probability of interconnection of artificial and natural drainage systems, with consequent risks to sewers, surface and ground water. Potential unconsented connections and discharges on and off-site with third party pipes/structures, risk of third party action and additional effluent treatment costs. Potential damage to site fabric and structures due to leakages and collapse. Major cost implications for investigation and implementation of remedial measures. Drainage investigation and risk assessment essential.
H2 (High)	As above, but shallower slopes (longer retention times in drains) or more distant (over 250m) to surface watercourses or with detailed records of drainage systems.	As above, but potentially lower investigatory and remedial costs. Drainage investigation and risk assessment essential.
M1 (Moderately high)	More than one phase of site development with limited historic records of drainage systems (sewers, surface water, pipelines). Over 250m from surface watercourse.	As above, but less extensive drainage investigation and reduced investigation and remedial costs.
M2 (Moderate)	More than one phase of site development with detailed historic records of drainage systems (sewers, surface water, pipelines).	As above, costs likely to be dependent on-site processes and degree of maintenance of existing drainage systems.
L1 (Low)	Recent (greenfield) development, with recorded and low intensity drainage systems or older sites with thoroughly investigated and recorded drainage systems, drainage risk assessment and implementation of remedial measures. Within 250m of surface watercourses or on low permeability strata. No mine drains.	Leakages from drains may contaminate soil locally and eventually reach a watercourse. Low risk of third party action.
L2 (Very low)	Recent (greenfield) development, with recorded and low intensity drainage systems, or older sites with thoroughly investigated/recorded drainage systems, drainage risk assessment and implementation of remedial measures. Remote from surface watercourses, all drainage to adopted sewers and with no permeable strata within 10m of the site surface. No mine drains.	Leakages from drains may contaminate soil locally.

Table A – Consequence of Risk

CLASSIFICATION	DEFINITION	EXAMPLES
Severe	Highly elevated concentrations likely to result in "significant harm" to human health as defined by the EPA 1990, Part 2A, if exposure occurs. Equivalent to EA Category 1 pollution incident including persistent and/or extensive effects on water quality; leading to closure of a potable abstraction point; major impact on amenity value or major damage to agriculture or commerce. Short term risk of pollution of sensitive (H1/H2) water resource. Major damage to aquatic or other ecosystems, which is likely to result in a substantial adverse change in its functioning or harm to a species of special interest that endangers the long-term maintenance of the population. A short term risk to a particular ecosystem, or organism forming part of such ecosystem. Catastrophic damage to crops, buildings or property.	Significant harm to humans is defined in circular 01/2006 as death, disease, serious injury, genetic mutation, birth defects or the impairment of reproductive functions. Major fish kill in surface water from large spillage of contaminants from site. Highly elevated concentrations of List I and II substances present in groundwater close to small potable abstraction (high sensitivity). Explosion, causing building collapse (can also equate to immediate human health risk if buildings are occupied).
Medium	Elevated concentrations which could result in "significant harm" or "significant possibility of significant harm" to human health as defined by the EPA 1990, Part 2A if exposure occurs. Equivalent to EA Category 2 pollution incident including significant effect on water quality; notification required to abstractors; reduction in amenity value or significant damage to agriculture or commerce. Pollution of a highly sensitive (H1/H2) water resource. Significant damage/change to aquatic or other ecosystems, which may result in a substantial adverse change in its functioning or harm to a species of special interest that may endanger the long-term maintenance of the population. Significant damage to crops, buildings or property.	Significant harm to humans is defined in circular 01/2006 as death, disease, serious injury, genetic mutation, birth defects or the impairment of reproductive functions. Damage to building rendering it unsafe to occupy e.g. foundation damage resulting in instability. Ingress of contaminants through plastic potable water pipes.
Mild	Exposure to human health unlikely to lead to "significant harm". Equivalent to EA Category 3 pollution incident including minimal or short lived effect on water quality; marginal effect on amenity value, agriculture or commerce. Pollution of moderately sensitive (M1/M2) water resources. Minor or short lived damage to aquatic or other ecosystems, which is unlikely to result in a substantial adverse change in its functioning or harm to a species of special interest that would endanger the long-term maintenance of the population. Significant damage to crops, buildings, structures and services ("significant harm" as defined in Circular 1/2006).	Exposure could lead to slight short-term effects (e.g. mild skin rash). Surface spalling of concrete.
Minor	No measurable effect on humans. Equivalent to insubstantial pollution incident with no observed effect on water quality or ecosystems. Repairable effects of damage to buildings, structures and services. Pollution of low sensitive (L1/L2) water resource. Harm, although not necessarily significant harm, which may result in a financial loss, or expenditure to resolve. Non-permanent health effects to human health (easily prevented by means such as personal protective clothing etc). Easily repairable effects of damage to buildings, structures and services.	The loss of plants in a landscaping scheme. Discoloration of concrete.

The probability of the risk occurring is classified according to criteria given in Table B below:

Table B – Probability of Risk Occurring

CLASSIFICATION	DEFINITION	EXAMPLES
High likelihood	There is pollutant linkage and an event would appear very likely in the short-term and almost inevitable over the long-term, or there is evidence at the receptor of harm or pollution.	a) Elevated concentrations of toxic contaminants are present in soils in the top 0.5m in a residential garden. b) Ground/groundwater contamination could be present from chemical works, containing a number of USTs, having been in operation on the same site for over 50 years.
Likely	There is pollutant linkage and all the elements are present and in the right place which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short-term and likely over the long-term.	a) Elevated concentrations of toxic contaminants are present in soils at depths of 0.5-1.0m in a residential garden, or the top 0.5m in public open space. b) Ground/groundwater contamination could be present from an industrial site containing a UST present between 1970 and 1990. The tank is known to be single skin. There is no evidence of leakage although there are no records of integrity tests.
Low likelihood	There is pollutant linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a long period such an event would take place, and is less likely in the shorter term.	a) Elevated concentrations of toxic contaminants are present in soils at depths >1m in a residential garden, or 0.5-1.0m in public open space. b) Ground/groundwater contamination could be present on a light industrial unit constructed in the 1990s containing a UST in operation over the last 10 years – the tank is double skinned but there is no integrity testing or evidence of leakage.
Unlikely	There is pollutant linkage but circumstances are such that it is improbable that an event would occur even in the very long-term.	a) Elevated concentrations of toxic contaminants are present below hardstanding. b) Light industrial unit <10 yrs old containing a doubleskinned UST with annual integrity testing results available.
Negligible	There is pollutant linkage but circumstances are such that it is risk cannot be differentiated from nil (so rare that the risk is regarded a nil)	a) in-filled pond off site' b) electricity substation 50m from the site

An overall evaluation of the level of risk is gained from a comparison of the severity and probability, as shown in Table C below:

Table C – Calculation of Risk

		CONSEQUENCE			
		Severe	Medium	Mild	Minor
PROBABILITY	High Likelihood	Very High Risk	High Risk	Moderate Risk	Moderate / Low Risk
	Likely	High Risk	Moderate Risk	Moderate / Low Risk	Low Risk
	Low Likelihood	Moderate Risk	Moderate / Low Risk	Low Risk	Very low Risk
	Unlikely	Moderate / Low Risk	Low Risk	Very low Risk	Very low Risk
	Negligible	Low Risk	Very low Risk	Very low Risk	Very low Risk

The above evaluated risk terms are described hereunder in Table D:

Table D – Description of the Evaluated Risks from Table 3

EVALUATED RISK	DESCRIPTION
Very High Risk	There is a high probability that severe harm could arise to a designated receptor from an identified hazard, OR, there is evidence that severe harm to a designated receptor is currently happening. This risk, if realised, is likely to result in a substantial liability. Urgent investigation (if not undertaken already) and remediation are likely to be required.
High Risk	Harm is likely to arise to a designated receptor from an identified hazard. Realisation of the risk is likely to present a substantial liability. Urgent investigation (if not undertaken already) is required and remedial works may be necessary in the short term and are likely over the long term.
Moderate Risk	It is possible that harm could arise to a designated receptor from an identified hazard. However, it is relatively unlikely that any such harm would be severe, or if any harm were to occur it is more likely that the harm would be relatively mild. Investigation (if not already undertaken) is normally required to clarify the risk and to determine the potential liability. Some remedial works may be required in the longer term.
Low Risk	It is possible that harm could arise to a designated receptor from an identified hazard, but there is a low likelihood of this hazard occurring and if realised, harm would at worst normally be mild.
Very Low Risk	There is a low possibility that harm could arise to a receptor. In the event of such harm being realised, it is not likely to be severe.
No Potential Risk	There is no potential risk if no pollution linkage has been established.

The likely action required for each of the above evaluated risks is as follows:

Action in the form of site investigation and risk assessment, mitigation of risk or remediation of contamination is required at sites evaluated as **Very High Risk** or **High Risk**.

Site investigation is required at sites evaluated as **Moderate Risk**.

No action is required at sites evaluated as **No Potential Risk**, **Low Risk** or **Very Low Risk**.

Tier 2: Generic Quantitative Risk Assessment (GQRA)

GQRA requires an intrusive investigation in order to characterise the site assisting in the re-assessment of the source-pathway receptor linkage. The conceptual model should be refined accordingly.

If GQRA reveals that unacceptable risks are not present then no further action is required. If GQRA identifies a possibility of risk, a decision must be made whether further work is required or necessary for the purposes of risk assessment. If further risk assessment is deemed not suitable / not required an Options Appraisal should be undertaken. If further risk assessment is required, the scope / nature of further risk assessment must be decided – it is possible that a Tier 3 DQRA will be undertaken in this scenario.

Tier 3: Detailed Quantitative Risk Assessment (DQRA)

DQRA is used when pollutant linkages require further assessment. DQRA is often undertaken for pollutant linkages where GAC are unavailable or inappropriate for or more conservative than the actual circumstances of the site. Site specific data is used to create Site Specific Assessment Criteria (SSAC) and enable a more accurate assessment of the risks. Further investigation may or may not be required to formulate SSAC depending on the site specific conditions and information already obtained.

If DQRA reveals that unacceptable risks are not present then no further action is required. If DQRA identifies a possibility of risk, a decision must be made whether further work is required or necessary for the purposes of risk assessment. If further risk assessment is deemed not suitable / not required an Options Appraisal should be undertaken. If further risk assessment is required, the scope nature of further risk assessment must be decided.

NOTE: A Tier 1 Preliminary Risk Assessment is undertaken as part of a Desk Study Report and a Preliminary Conceptual Model is developed for all pollutant linkages including risks ground gas and controlled waters. The methodologies for assessing the risks to human health, risks to controlled waters and risk posed by ground gas using quantitative techniques vary considerably, therefore GQRA and DQRA for human health, controlled waters and ground gas must be undertaken separately. The risk assessment methodologies where quantitative assessment is used for risks to human health, risks to controlled waters and risks posed by ground gas, if relevant, are described hereunder.

HUMAN HEALTH RISK ASSESSMENT METHODOLOGY – SOIL AND WATER

Background

In January 2009, the EA published the revised Contaminated Land Exposure Assessment (CLEA) Model and a series of related reports. These were designed to provide a scientifically based framework for the assessment of chronic risks to human health from contaminated land. These reports together with associated "TOX" and "SGV" documents are continually being published and will be used in any assessment.

Guidance on statistical assessment is given in CL:AIRE :2008 "Guidance on Comparing Data With a Critical Concentration"

A different approach to the statistical appraisal of data is required depending on whether the assessment of risk is to assess whether land is Contaminated Land in accordance with regulations, or whether the assessment is to determine whether the site is suitable for new development in accordance with planning guidance. This is discussed further in CL:AIRE :2008 "Guidance on Comparing Data With a Critical Concentration".

COLLATION OF SOIL TOXICOLOGICAL DATA

The toxicological data collated by **Demeter Environmental Ltd** is presented as a separate document, available to regulatory bodies on request. The data gathered is generally in accordance with the hierarchy given in the EA Science Report SC050021/SR21 "Human health toxicological assessment of contaminants in soil". The hierarchy may be circumvented where more up to date authoritative data from a toxicological study has been published from sources lower down the hierarchy.

DERIVATION OF SOIL ASSESSMENT CRITERIA

GAC's derived by **Demeter Environmental Ltd** are based on a Soil Organic Matter (SOM) content of 1%. Whilst this approach differed from the Environment Agency (who have published SGV's based on a 6% SOM) it provides a more conservative GQRA. Where SSAC's are required, site specific SOM will be used in the DQRA. Where available, other parameters such as building size, receptor and soil characteristics will be used in the DQRA.

Assessment criteria are available from a number of sources, namely (and in order of use):

1. Land Quality Management Suitable for Use Levels (S4UL's) (Copyright Land Quality Management Limited reproduced with permission; Publication number S4UL3093. All rights reserved);
2. C4SL for lead;
3. EIC/AGS/CL:AIRE Generic Assessment Criteria;
4. In-house derived GAC's / S4UL's.

STATISTICAL ASSESSMENT OF SOIL CONTAMINATION DATA

In any site investigation only a small fraction of the soil on the site is analysed. Therefore the mean derived from the contamination data for a contaminant may not be the same as the true mean for the contaminant distribution on the site. To improve the reliability of any assessment a statistical analysis is if the dataset is undertaken.

The statistical assessment is undertaken using ProUCL, which is published by the USEPA, which provides a statistical assessment that exceeds the guidance given in the CL:AIRE document "Guidance on Comparing Soil Contamination Data with a Critical Concentration".

Where the number of results in a dataset is less than four, a statistical assessment cannot be undertaken, and the assessment is performed by comparison of the maximum value(s) with the assessment criteria. Dependant on the distribution of the data, a statistical analysis may not be feasible and in those cases the results will be assessed directly to their respective assessment criteria.

If the screening levels are exceeded then more sophisticated quantitative risk assessment can be undertaken or remedial action may be taken to break the pollutant linkages. The benefits of undertaking a quantitative risk assessment must be weighed against the likelihood that it will bring about cost savings in the proposed remediation.

ASSESSMENT OF RISK TO HUMAN HEALTH

ASSESSMENT VALUES

Assessment criteria are available from a number of sources, namely:

1. Land Quality Management Suitable for Use Levels (S4UL's) (Copyright Land Quality Management Limited reproduced with permission; Publication number S4UL3093. All rights reserved);
2. C4SL for lead (the C4SL is used in lieu of the in house derived GAC as it provides a more conservative assessment);
3. EIC/AGS/CL:AIRE Generic Assessment Criteria;
4. In-house derived GAC's / S4UL's

TIER 2 GENERIC ASSESSMENT CRITERIA FOR SOILS

Generic Assessment Criteria (GAC's) have been derived by **Demeter Environmental Ltd** to aid in the assessment of the risk to human health. These are derived using CLEA v1.06. Details of the derivation of the GAC's are provided within the Report. GAC's are based on generic assumptions on the land use, building and soil parameters.

SITE SPECIFIC ASSESSMENT CRITERIA FOR SOILS

Where there are exceedances of the Tier 2 GAC, Site Specific Assessment Criteria (SSAC) are derived, using site specific data for the Soil Organic Matter (SOM), building parameters, land use etc. An SSAC, like SGV's, S4UL's and GAC's is a threshold below which the risk is minimal.

Whilst CLEA v1.06 is normally used to derive SSAC's, other risk assessment packages may be used if they are more suitable for the subject site.

ASSESSMENT OF RISK TO HUMAN HEALTH FROM SOIL WATER

Where exposure to contamination in soil water is significant this will be assessed using BP RISC (amended to be as close to UK compliant as possible).

CONTROLLED WATER RISK ASSESSMENT METHODOLOGY

Background

Definition of Controlled Waters

The term 'controlled waters' is defined in Section 104 of the Water Resources Act 1991 as:

"Territorial Waters...which extend seawards for three miles..., coastal waters..., inland freshwaters, waters in any relevant lake or pond or of so much of any relevant river or watercourse as is above the freshwater limit, and ground waters, that is to say, any waters contained in underground strata."

Note that the definition of groundwater under the Water Resources Act 1991 includes all water within underground strata (including soil / pore water in the unsaturated zone). The definition of groundwater under the Groundwater Directive however is limited to water in the saturated zone. From the 1st October 2004, the definition of groundwater in relation to Part IIA was amended, by the Second Water Act Commencement Order SI 2004 No 2528. For the purposes of Part IIA of the Environmental Protection Act 1990, the Environment Agency recommends that the groundwater within the saturated zone only is considered as the receptor (rather than soil / pore water).

INTRODUCTION

Demeter Environmental Ltd utilises the methodology for the assessment of groundwater as discussed in the Environment Agency publication 'Remedial Targets Methodology and Policy and Protection of Groundwater.

The procedure for determining site-specific remedial targets is summarised below:

- 1) Determine a target concentration at the receptor or compliance point in relation to its use.
- 2) Undertake the tier assessment to determine whether the contaminant source would result in the target concentration being exceeded at the receptor or compliance point. At each tier, a remedial target is determined.
- 3) If the contaminant concentrations on-site exceed the remedial target, then the decision whether it is appropriate to upgrade the tier analysis is based on:
 - timescale – the decision to proceed to the next tier analysis should only be made if any risk involved in delaying the decision to implement the remedial action is acceptable;
 - what additional information is required and can be obtained;
 - cost-benefit analysis, i.e. the cost of tier upgrade in relation to the potential reduction in the cost of the remedial solution.

Four assessment tiers are proposed for the assessment of contaminated soil to protect water resources:

Level 1 considers whether contaminant concentrations in "pore water" in contaminated soil are sufficient to impact on the receptor, ignoring dilution, dispersion and attenuation along the pathway. The "pore water" concentration is determined from:

- i) measured "pore water" concentrations or perched water quality;
- ii) soil leaching tests;
- iii) theoretical calculations based on soil/water partitioning equations.

Level 2 considers dilution by the receiving groundwater or surface water body and whether this is sufficient to reduce contaminant concentrations to acceptable levels. The remedial target is defined as the target concentration multiplied by a dilution factor (DF).

Levels 3 and 4 consider whether natural attenuation (including dispersion, retardation and degradation) of the contaminant as it moves through the unsaturated and saturated zones to the receptor are sufficient to reduce contaminant concentrations to acceptable levels. The remedial target is defined as target concentration multiplied by a dilution factor (DF) and attenuation factor (AF). In Level 3 simple analytical models are used to calculate the significance of attenuation, whereas in Level 4 more sophisticated numerical models are used.

For each level, the "pore water" concentration determined for the soil zone is compared to the remedial target to determine the need for remedial action.

The assessment in relation to contaminated groundwater commences at Level 2 as the contaminants have already moved through the soil zone, so that the only processes of significance are attenuation, dispersion and further dilution of this groundwater as it moves from the source towards the receptor. Thus the assessment levels for contaminated groundwater are:

Level 2 – the observed contaminant concentration in groundwater below the site is compared directly to the target concentration.

Levels 3 and 4 – the observed groundwater concentration below the site is compared directly to the target concentration multiplied by an attenuation factor (AF); as with the soil levelled assessment, Levels 3 and 4 are distinguished by the sophistication of the modelling and prediction processes.

BACKGROUND INFORMATION, CURRENT GUIDANCE AND RISK ASSESSMENT METHODOLOGY FOR RISKS POSED BY GROUND GAS

Background

Origin of Ground and Landfill Gases

When carrying out a ground gas risk assessment, the origin or source of the gases is important as potential risks will vary depending on the source. This Appendix relates to the risk of the two main ground gases of concern; methane and carbon dioxide, and does not apply to other ground gases (e.g. radon or vapours from hydrocarbon spills). Methane and carbon dioxide are major constituents of ground gas but can also occur from a variety of anthropogenic and natural sources, as summarised in Table E below. The generation potential of each source is given below.

Table E- Sources and Origins of Ground Gases

Source	Origin		Typical Range of Concentrations			Generation Potential
			Methane	Carbon Dioxide	Others	
Anthropogenic						
Landfill sites (include shallow and old landfill)	Microbial decay of organic materials derived from the disposal of putrescible materials	Landfill gas is a product of the biodegradation of organic materials contained in wastes deposited in landfill sites. Age and composition of landfill affect the gas regime. The gas regime will also be influenced by physical parameters such as volume/depth of waste and the groundwater regime, as well as environmental factors such as temperature, moisture content and pH value. These factors are considered in some detail in earlier CIRIA guidance (Barry et al, 2001). The Environment Agency Guidance on the management of landfill gas provides useful information on the mechanisms by which landfill gas is generated, its composition and physical and chemical characteristics and behaviour (Environment Agency, 2004a). Leachate from landfill sites may also contain dissolved gases or may degrade during migration to produce methane with carbon dioxide and associated gases.	20-65%	15-40%	Several hundred trace organic gases (maybe odorous or toxic) (generally makes up <1% of total volume, eg H2S)	Very high if the landfill has recently closed (post 1960) Moderate (pre 1960 landfills) Very low (inert landfills)
Made ground	Microbial decay of organic materials contained in reworked natural ground containing demolition and other wastes	Made ground will often contain degradable material such as wood, rags, paper and vegetation. However, the proportion of such carbon-rich materials is typically low, with major components often comprising re-worked clays, silts, sands and gravels together with anthropogenic inclusions such as ash, clinker, brick, concrete etc. Many brownfield sites contain made ground and on these sites the methane concentrations are usually not highly elevated, although there are exceptions, while concentrations of carbon dioxide can typically range to higher values. The rate of gas generation also tends to be low, resulting in small but sustained volumes of gas. There often tends to be a lack of driving force within made ground (see Section 2.6.1). The low rate of gas generation, the limited driving force and the fact that the gas is denser than air result in little upward migration of carbon dioxide.	0-20%	0-10%		Very low (inert made ground) Low (made ground with high levels of organic/putrescible matter)
Foundry sands	Microbial decay of waste materials from the foundry process (phenolic binders, dextrin, coal dust, wood rags, paper)	In foundry sands, organic materials resulting from the foundry process such as phenolic binders, detrin and coal dust, and other foundry wastes such as wood, lignin and paper can provide a substrate for methanogenic bacteria (Hooker et al, 1993)	Up to 50%	15-40%	Trace organic gases (generally <1% of total volume) (maybe odorous and/or toxic)	Very low to low depending on presence of organic/putrescible matter

Table E (continued)- Sources and Origins of Ground Gases

Source	Origin		Typical Range of Concentrations			Generation Potential
			Methane	Carbon Dioxide	Others	
Anthropogenic						
Sewage sludge, dung, cess pits/heaps	Microbial decay of organic materials	Methane and carbon dioxide are the main components associated with the anaerobic decomposition of organic components of sewage (Hooker et al, 1993). Hydrogen sulphide is also often present resulting from the degradation of organic matter and sulphur containing compounds (including mercaptans) in the sewage. Nitrogen oxide and ammonia gases are also associated with sewage. These gases can be a problem in sewer systems with confined spaces such as pipework, manholes and service chambers which can lead to potentially explosive, asphyxiating or chemically harmful atmospheres. Additionally the formation of sulphuric acid from the oxidation of hydrogen sulphide can corrode pipes, resulting in migration into the surrounding soils.	60-75%	18-40%	Trace organic gases (generally <1% of total volume) (maybe odorous and/or toxic)	Moderate
Burial Grounds (including cemeteries)	Microbial decay of organic materials contained within human/animal remains.	The generation of gases from the decomposition of corpses is well documented (Polson et al, 1975). The gases generated are predominantly carbon dioxide and methane with trace amounts of odorous sulphur-containing gases. Diphosphane may be generated by anaerobic decomposition of phosphorus in skeletal material (generally in waterlogged areas). Other gaseous emissions may include formaldehyde, associated with the preparation of cadavers and present in medium density fibreboard (MDF), widely used to make coffins.	20-65%	15-40%		Moderate
Industrial/chemical/petroleum sites/manufacturing	Organic vapours derived from leaks or spills from storage, processing and disposal areas		3-100%	2-8%	Trace organic gases (generally <1% of total volume) (maybe odorous and/or toxic), cyanide	Low
Natural gas (supply pipes)	Leakage from bulk pipeline transportation of natural gas	Mains gas is derived from the same geological source as methane in coal mines. Leaks into surrounding soils can occur from damaged or poorly maintained underground pipes. In the UK, a combination of mercaptans and sulphide are added as odourants which can often be detected. Ethane additives will also indicate the presence of distributed main gases.	90-95%	0-9.5%	1 – 27% C2-C4 alkanes, 4.7% CO	Low

Table E (continued)- Sources and Origins of Ground Gases

Natural						
Soils	Physical, chemical and biological transformations of rock during weathering		<2ppm	350ppm		Very low (none if no organic material is present)
Coal measures strata	Burial of vegetation under high temperatures and pressures, liberating gases as a by-product as a result of mining activities	Methane is associated with coal bearing carboniferous strata, produced by the anaerobic decomposition of ancient vegetation trapped within the rock. Associated gases include higher alkanes (for example ethane), hydrogen and helium. Former shafts and/or fractured rock can provide a migration pathway to the surface and rising groundwater or flooding of mine workings can release trapped methane and carbon dioxide.	<1-90%	0-6%	4-13% C ₂ -C ₄ alkanes, 0 - 10% CO production of H ₂ S possible but rarely occurs in hazardous concentrations	High (active mine working) Moderate (abandoned mine working) Very low (flooded mine workings)
Peat/bog areas	Gas formed by the microbial decay of accumulated plant debris under anaerobic conditions	Methane from these sources is produced by the microbial decay of organic material under anaerobic conditions, usually waterlogged vegetation. Carbon dioxide is usually produced by acid reaction on carbonate fraction in any alluvial soil, and also generated by methane oxidation. Trace gases include hydrogen sulphide and light hydrocarbons. Methane can migrate large distances through soils. The source of the methane which caused the explosion at Abbeystead in 1985 was naturally occurring oil shales at more than 1 km depth.	10-90%	0-5%		Moderate
Alluvium (organic rich sediments)			0-5%	0-10%		Low (may be very low depending on levels of organic matter)
Radon emitting rocks	Decay of naturally occurring uranium within soils and rocks	Radon is a radioactive gas that occurs naturally and has no taste, smell or colour. It is formed from the decay of uranium, which is found in small quantities in all soil and rocks, in particular granite. Radionuclides (the decay products of radon) can damage lung tissues and ultimately lead to lung cancer. An action level of 200 Bq/m ³ was set by the former National Radiological Protection Board	Variable	Variable	0-1000 Bq/m ³ radon gas. Higher concentrations of gas up to 4,000,000 Bq/m ³ have been recorded in the southwest	N/A
Carbonate rich strata	Dissolution of calcium carbonate by acidic water	Acidic waters such as rainwater can react with calcium carbonate (e.g. chalk and limestones etc) to form carbon dioxide. Elevated concentrations of carbon dioxide (>five per cent) have been detected in confined spaces particularly those associated with groundwater abstraction infrastructure such as pump houses, located in chalk areas.	Variable	1-9%		Very low to low depending on water content

This does not provide guidance for the assessment of risk when other gases are present due to 'Other Sources' from the above table (particularly volatile organic compounds or for the risk from radon or hydrogen sulphide).

To determine the origin of the gas a range of factors must be considered together, including;

1. Proximity of likely sources
2. Ground conditions (geology, hydrogeology, anthropogenic pathways etc)
3. Properties of gases present including:
 - Chemical composition
 - Physical properties
 - Ratios of components e.g. methane: carbon dioxide
4. Timeframe of activities such as infilling periods, capping works, installation of gas control systems etc

Identification of the originating source may be problematic given that there may be more than one source present and trace gas analysis may be required. Identification of the sources of the gases encountered during monitoring is usually carried out through a process of eliminating the most unlikely potential sources (given the site setting) and selecting those which are most likely.

Hazards Associated with Presence of Methane

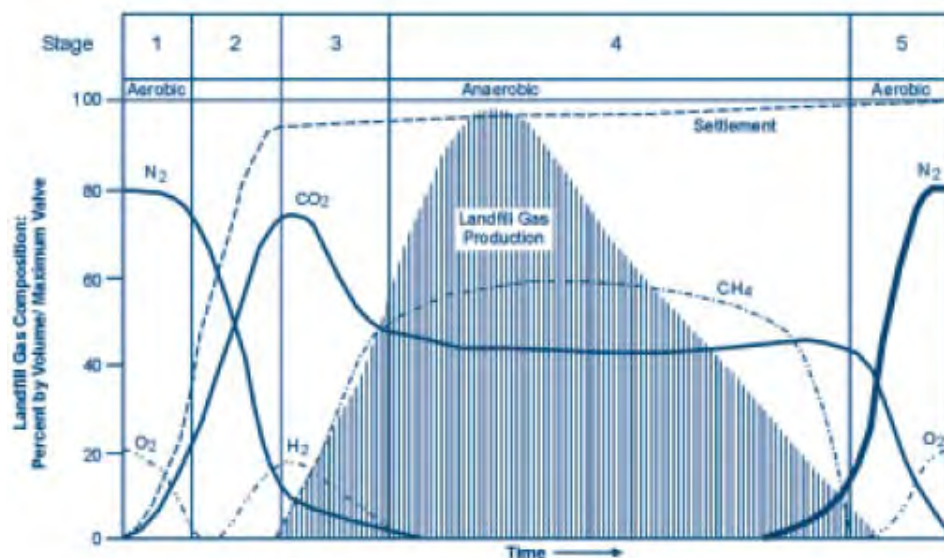
Methane gas is combustible and potentially explosive. When the concentration of methane in air is between the limits of 5.0%v/v and 15.0%v/v an explosive mixture is formed. The Lower Explosive Limit (LEL) of methane is 5.0%v/v, which is equivalent to 100% LEL. The 15.0%v/v limit is known as the Upper Explosive Limit (UEL), but concentrations above this level cannot be assumed to represent safe concentrations. Further, the LEL and UEL will vary (up and down) depending upon the proportion of other gases (including oxygen). However, the fact that methane is a colourless, odourless gas means that there is no simple indicator of the presence of the gas until such a time as explosive limits are reached and an incident occurs. Methane is lighter than air and has a low toxicity. However, at high concentrations it can result in asphyxiation due to oxygen displacement.

Hazards Associated with Presence of Carbon Dioxide

Carbon dioxide is a colourless, odourless gas, which, although non-flammable, is both toxic and an asphyxiant. As carbon dioxide is denser than air, it will collect in low points and depressions. The UK Health & Safety Executive (HSE) has published information relating to concentrations of carbon dioxide that humans may be exposed to, which uses concentrations contained in the Control of Substances Hazardous to Health Regulations 2002 (as amended). These are the Long Term Occupational Exposure Limit (LTOEL, 8 hour period) and the Short Term Occupational Exposure Limit (STOEL, 15 minute period), which are 0.5% and 1.5% carbon dioxide, respectively.

Parameters Influencing the Rate of Ground Gas Production

The figure below is taken from EA guidance document LFTGN 03 illustrates typical ground gas generation curves from biodegradable materials:



The production of methane and carbon dioxide at a landfill site may be expected to be considerable and ongoing. Concentrations of methane will eventually decrease, followed by concentrations of carbon dioxide, but the duration and rate of gas production can vary markedly between sites. Five distinct phases of gas production occur during the process which are, in order of event as marked above, as follows:

1. An aerobic phase involving oxygen depletion and temperature increase through aerobic respiration;
2. The establishment of anaerobic conditions and the evolution of carbon dioxide and hydrogen through acidogenic activity;
3. Commencement of methanogenic activity; the establishment of populations of methanogenic bacteria;
4. A phase of stable methanogenic activity, which may go on for many tens of years;
5. A phase of decreasing methanogenic activity, representing depletion of the organic material and a return to aerobic conditions.

The time scale for the return to the normal ground gas concentrations will be highly variable, depending upon the types and quantities of materials present. In addition, the optimum parameters influencing the rate of decomposition and ground gas production within the ground at a site are as follows:

- High water content with adequate rainfall and water infiltration to provide moisture content between approximately 20 to 26%;
- Conditions that either are or are very close to anaerobic;
- High proportion of biodegradable materials;
- A pH between 6.5 and 8.5, ideally verging slightly on the acidic between pH 6 to 7;
- Temperature between 25°C and 55°C;
- The ratio of the biochemical and chemical oxygen demands (BOD:COD);
- High permeability;
- Small particle size, as finer subsurface materials possess a greater surface area to provide a growing 'face' for the micro-organisms but high fines levels reduces permeability and reduces decomposition rate.

For this reason, it is vital that sources of methane and carbon dioxide are identified prior to the commencement of any work on a construction site, and that the ground gas regime is characterised at the worst temporal conditions a site may experience. From this, a risk assessment is carried out to identify the risk at the site from ground gases so that suitable protection measures can be designed and incorporated into a development to prevent a dangerous build-up of gas occurring.

Factors Influencing the Migration and Behaviour of Ground Gases

There are many factors that influence the migration of ground gases which can affect the risk from a gassing source:

- driving force – pressure differential along a pathway, diffusion and dissolved in solution;
- meteorological conditions – short term and seasonal conditions including atmospheric pressure changes (e.g. rapidly falling pressure causes gas to expand increasing emission rates), rainfall, frozen ground and thawing, temperature;
- geological and groundwater conditions – these can have the over riding influence on the direction/pathways and quantity of migrating gas;
- anthropogenic influences – man-made pathways include mine shafts, service runs/drains, foundation piles, underground voids/pits/basements, foundation/building design/construction

Ground Gas Risk Assessment Methodology

Assessment of risk posed by ground gas is undertaken using the methodology as outlined previously, and summarised hereunder:

- Tier 1 Preliminary Risk Assessment
- Tier 2 Generic Quantitative Risk Assessment
- Tier 3 Detailed Quantitative Risk Assessment

The methodology used in each of the above assessments with concern to ground gas is discussed hereunder.

Tier 1 Preliminary Risk Assessment

All potential sources of methane and carbon dioxide are identified in the Preliminary Conceptual Model and the generation potential determined. The background information discussed earlier is referred to in order to determine the potential for a source to generate ground gas.

CIRIA C665 provides idealised monitoring frequency / period dependent upon generation potential of gas source and sensitivity of the proposed land use as below:

Idealised Frequency and Period of Monitoring (after Table 5.5a and 5.5b, CIRIA C665)

		Generation Potential of Source				
		Very Low	Low	Moderate	High	Very High
Sensitivity of Development	Low (Commercial)	4/1	6/2	6/3	12/6	12/12
	Moderate (Flats)	6/2	6/3	9/6	12/12	24/24
	High (Residential with Gardens)	6/3	9/6	12/6	24/12	24/24

Notes

1. First number is the number of readings and the second is the minimum period in months (e.g. 6/2 – six sets of readings over two months).

2. At least two sets of readings must be at low (preferably under 1,000 mb) and falling pressure.

The monitoring programme is decided using the above table prior to the intrusive site investigation. However, if the intrusive investigation reveals that a potential source is better or worse than anticipated the monitoring programme should be modified accordingly. For example, if the made ground contains no evidence of organic material and comprises entirely granular brick fill, the potential for that made ground to generate ground gas is reduced considerably.

Tier 2 Generic Quantitative Risk Assessment

Generic Quantitative Risk Assessment is undertaken upon completion of the required gas monitoring period.

All three current guidance documents propose that both ground gas concentrations and flow rates are used to calculate the limiting gas well gas volume flow rates for methane and carbon dioxide, based on the ground gas conditions monitored for during the worse-case temporal conditions. This limiting gas well volume flow rate is termed the Gas Screening Value (GSV, note that this was termed borehole gas volume flow), and is calculated as follows:

$$\text{GSV (l/hr)} = \frac{[\text{gas well gas concentration (\%v/v)}] \times [\text{gas well flow rate (l/hr)}]}{100}$$

GSV's are compared to typical max concentrations and limiting gas screening values derived for either Situation A - All development except low rise housing with gardens, or Situation B low rise housing with gardens (NHBC Traffic Light System). Table 8.5 from CIRIA C665 is used for comparison of gas screening values for "Situation A Developments" and is presented hereunder:

Characteristic Situation (CIRIA R149)	Comparable Partners Technology Regime in gas (see Box 8.2)	Risk Classification	Gas Screening Value (CH ₄ or CO ₂) (l/hr) ¹	Additional Factors	Typical Source of Generation
1	A	Very low risk	<0.07	Typically methane ≤ 1% and/or carbon dioxide ≤ 5%. Otherwise consider increase to Situation 2	Natural soils with low organic content "Typical" made ground
2	B	Low risk	<0.7	Borehole air flow rate not to exceed 70l/hr. Otherwise consider increase to characteristic Situation 3	Natural soil, high peat/organic content. "Typical" made ground
3	C	Moderate risk	<3.5		Old landfill, inert waste, mine working flooded
4	D	Moderate to high risk	<15	Quantitative risk assessment required to evaluate scope of protective measures.	Mine working susceptible to flooding, completed landfill (WMP 26B criteria)
5	E	High risk	<70		Mine working unflooded inactive with shallow workings near surface
6	F	Very high risk	>70		Recent landfill site

Table 8.5 from CIRIA C665 Modified Wilson and Card Classification

Table 8.7 is used for comparison of gas screening values for "Situation B Developments" and is presented hereunder:

Traffic light	Methane ¹		Carbon dioxide ²	
	Typical max concentration ³ (% by volume)	Gas screening value ^{2,4} (litres /hour)	Typical max concentration ³ (% by volume)	Gas screening value ^{2,4} (litres /hour)
Green	1	0.13	5	0.78
Amber 1	5	0.63	10	1.60
Amber 2	20	1.60	30	3.10
Red				

Notes:

1. The worst-case ground gas regime identified on the site, either methane or carbon dioxide, at the worst-case temporal conditions that the site may be expected to encounter will be the decider as to what Traffic Light is allocated;
2. Borehole Gas Volume Flow Rate, in litres per hour as defined in Wilson and Card (1999), is the borehole flow rate multiplied by the concentration in the air stream of the particular gas being considered;
3. The Typical Maximum Concentrations can be exceeded in certain circumstances should the Conceptual Site Model indicate it is safe to do so;
4. The Gas Screening Value thresholds should not generally be exceeded without the completion of a detailed ground gas risk assessment taking into account site-specific conditions.

CIRIA C665 Table 8.7 NHBC Traffic light system for 150 mm void

Dependant on the outcome of the assessment of risk posed by ground gas it is determined whether gas protection measures are required for the proposed development, and or whether a detailed quantitative risk assessment is required for the site.

Selection & Design of Protective Measures

Table 8.6 and Box 8.4 of CIRIA C665 contain information on the detailed design of protection measures and were initially intended for the purposes of determining then level of protection measures a development requires. These tables and related text include some useful information on the design of gas protection measures, however BS8485:2015 which supersedes the guidance included within CIRIA C665, is used for selection of gas protection measures. BS8485:2015 uses a scoring system dependant on the Characteristic Situation / NHBC Traffic Light and proposed end use of the site. The scoring system is summarised in BS8485:2015 Table 4 as presented hereunder:

Characteristic gas situation, CS	NHBC traffic light	Required gas protection			
		Type A Building (private ownership with no building management controls on alterations to the internal structure, the use of rooms, the ventilation of rooms or the structural fabric of the building. Some small rooms present. Probably conventional building construction (rather than civil engineering). Examples include private housing and some retail premises)	Type B Building (private or commercial property with central building management control of any alterations to the building or its uses but limited or no central building management control of the maintenance of the building, including the gas protection measures. Multiple occupancy. Small to medium size rooms with passive ventilation of rooms and other internal spaces throughout ground floor and basement areas. May be conventional building or civil engineering construction. Examples include managed apartments, multiple occupancy offices, some retail premises and parts of some public buildings (such as schools, hospitals, leisure centres) and parts of hotels)	Type C Building (commercial building with central building management control of any alterations to the building or its uses and central building management control of the maintenance of the building, including the gas protection measures. Single occupancy of ground floor and basement areas. Small to large size rooms with active ventilation or good passive ventilation of all rooms and other internal spaces throughout ground floor and basement areas. Probably civil engineering construction. Examples include offices, some retail premises, and parts of some public buildings (such as schools, hospitals, leisure centres and parts of hotels).	Type D Building (industrial style building having large volume internal space(s) that are well ventilated. Corporate ownership with building management controls on alterations to the ground floor and basement areas of the building and on maintenance of ground gas protective measures. Probably civil engineering construction. Examples are retail park sales buildings, factory shop floor areas, warehouses.
1	Green	0	0	0	0
2	Amber 1	3.5	3.5	2.5	1.5
3	Amber 2	4.5	4.0	3.0	2.5
4	Red	6.5 (a)	5.5 (a)	4.5	3.5
5		(b)	6.5 (a)	5.5	4.5
6		(b)	(b)	7.5	6.5
NOTE Traffic light indications are taken from NHBC Report no.:10627-RO1 (04) and are mainly applicable to low-rise residential housing ¹ . These are for comparative purposes but the boundaries between the traffic light indications and CS values do not coincide.					
a) Residential buildings should not be built on CS4 or higher sites unless the type of construction or site circumstances allow additional levels of protection to be incorporated, e.g. high-performance ventilation or pathway intervention measures, and an associated sustainable system of management of maintenance of the gas control system, e.g. in institutional and/or fully serviced contractual situations.					
b) The gas hazard is too high for this empirical method to be used to define the gas protection measures					

The NHBC guidance and CIRIA C665 guidance refers to low rise housing (which is up to three storeys without lifts) that is constructed with a 150mm ventilated sub-floor void.

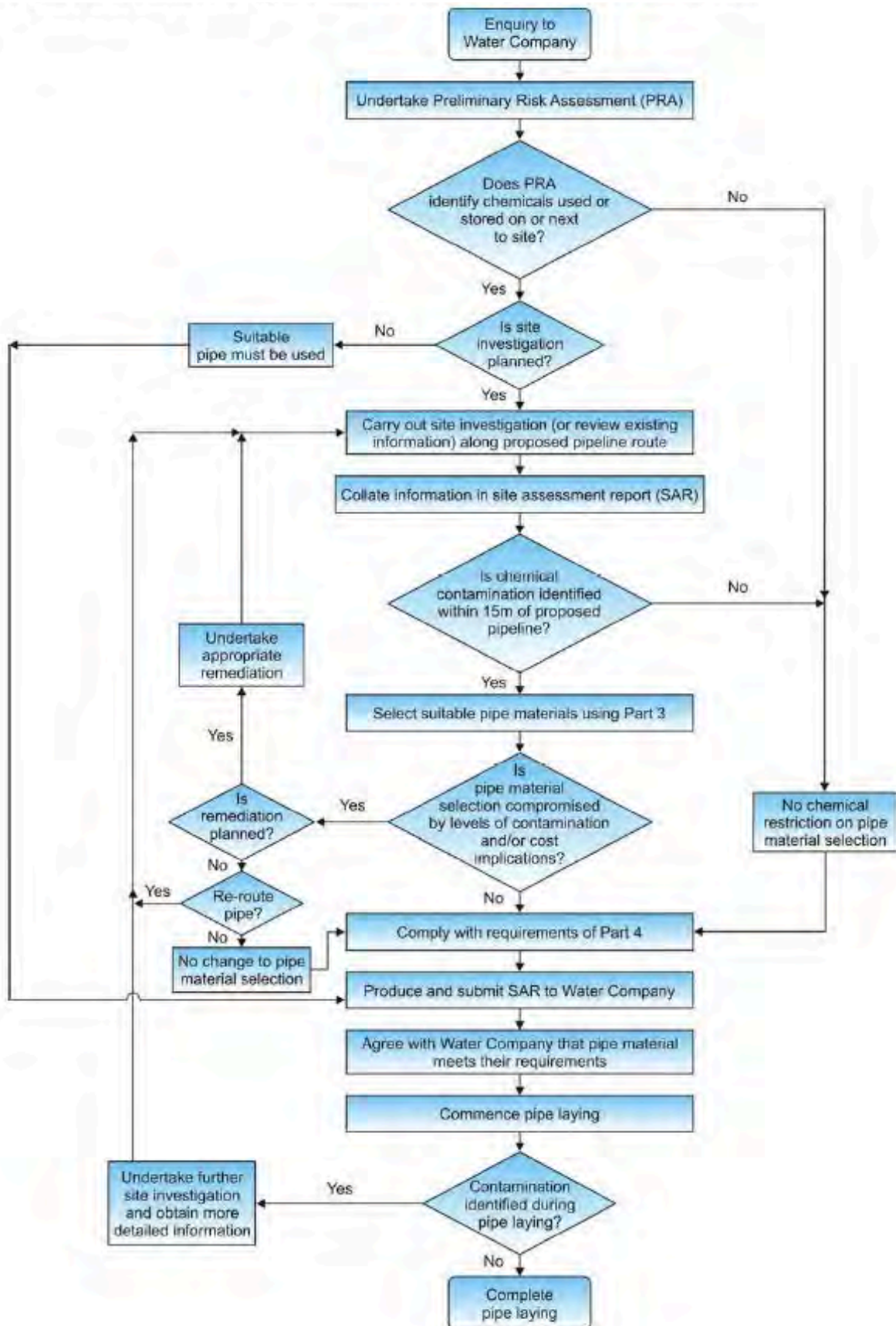
BS8485:2015 Table 2 Required gas protection by characteristic gas situation and type of building

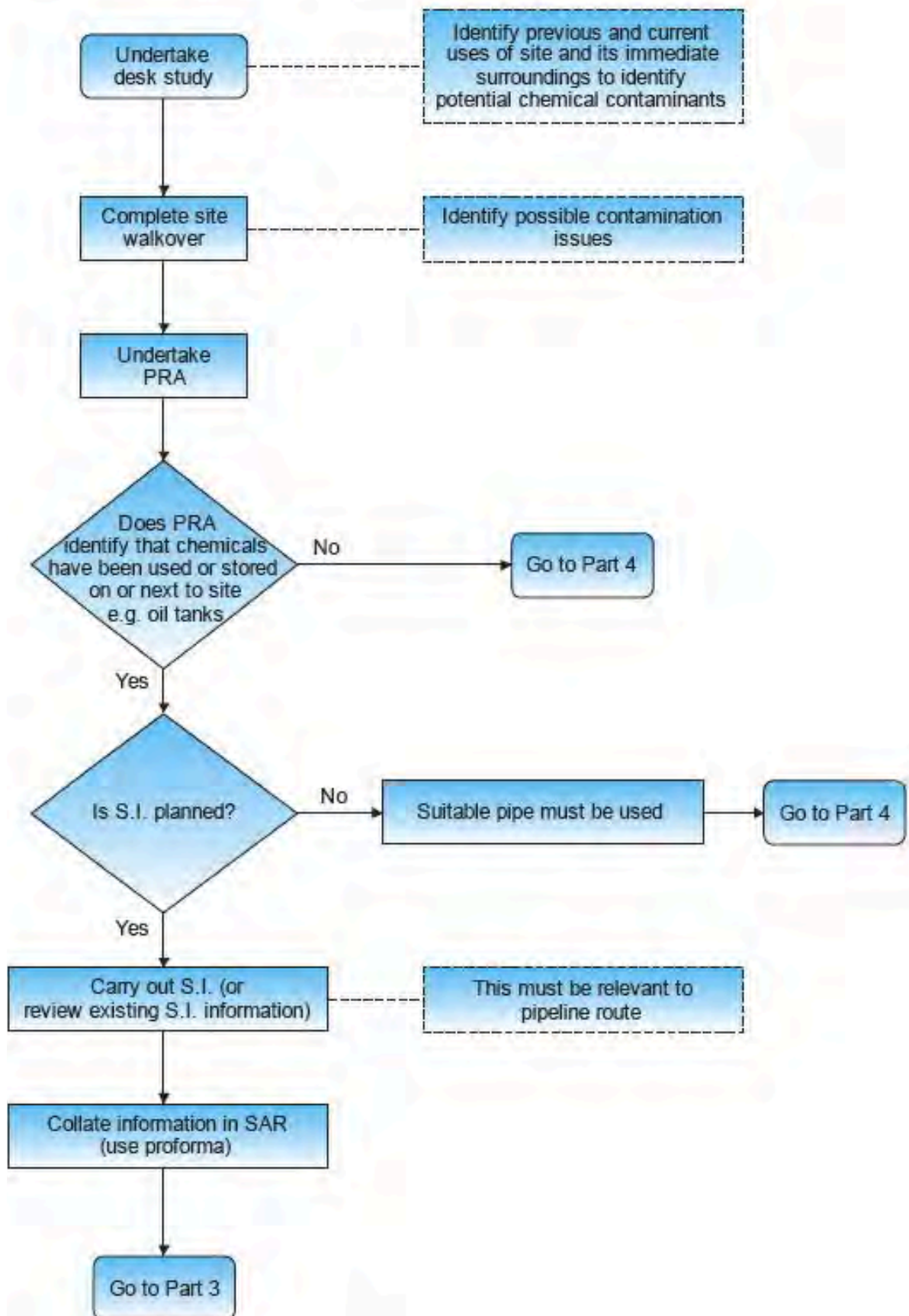
Once a score is assigned, a combination of protection systems / elements is chosen from BS8485:2015 Table 3 shown below:

PROTECTION ELEMENT/SYSTEM	SCORE	COMMENTS
Gas Protection Scores for Ventilation Protection Measures		
Pressure relief pathway (usually formed of low fines gravel or with a thin geocomposite blanket or strips terminating in a gravel trench external to the building)	0.5	Whenever possible a pressure relief pathway (as a minimum) should be installed in all gas protection measures systems. If the layer has a low permeability and/or is not terminated in a venting trench (or similar), then the score is zero.
Passive sub floor dispersal layer: Very good performance Media used to provide the dispersal layer are: • Clear void, Polystyrene void former blanket, Geocomposite void former blanket, No-fines Good performance gravel layer with gas drains, No-fines gravel layer	2.5 1.5	The ventilation effectiveness of different media depends on a number of different factors including the transmissivity of the medium, the width of the building, the side ventilation spacing and type and the thickness of the layer. The selected score should be assigned taking into account the recommendations in BS8485:2015. Passive ventilation should be designed to meet at least "good performance".
Active dispersal layer, usually comprising fans with active abstraction (suction) from a subfloor dilution layer, with roof level vents. The dilution layer may comprise a clear void or be formed of geocomposite or polystyrene void formers	1.5 to 2.5	This system relies on continued serviceability of the pumps, therefore alarm and response systems should be in place. There should be robust management systems in place to ensure the continued maintenance of the system, including pumps and vents. Active ventilation should always be designed to meet at least "good performance", as described in BS8485:2015.
Active positive pressurization by the creation of a blanket of external fresh air beneath the building floor slab by pumps supplying air to points across the central footprint of the building into a permeable layer, usually formed of a thin geocomposite blanket	1.5 to 2.5	This system relies on continued operation of the pumps, therefore alarm and response systems should be in place. The score assigned should be based on the efficient "coverage" of the building footprint and the redundancy of the system. Active ventilation should always be designed to meet at least "good performance".
Ventilated car park (floor slab of occupied part of the building under consideration is underlain by a basement or undercroft car park)	4.0	Assumes that the car park is vented to deal with car exhaust fumes, designed to Buildings Regulations 2000, Approved Document F
Gas Protection Scores for the Structural Barrier		
Floor and Substructure Design		
Precast suspended segmental subfloor (i.e. Block and beam floor slab)	0 (a)	a) The scores are conditional on breaches of floor slabs, etc. being effectively sealed;
Cast in situ ground-bearing floor slab (with only nominal mesh reinforcement)	0.5 (a)	b) to achieve a score of 1.5 the raft or suspended slab should be well reinforced to control cracking and have minimal penetrations cast in;
Cast in situ monolithic reinforced ground bearing raft or reinforced cast in situ suspended floor slab with minimal penetrations	1.0 or 1.5 (a), (b)	
Basement floor and walls conforming to BS 8102:2009, Grade 2 waterproofing (c)	2.0	c) the score is conditional on the waterproofing not being based on the use of a geosynthetic clay liner waterproofing product
Basement floor and walls conforming to BS 8102:2009, Grade 3 waterproofing (c)	2.5	
Membranes		
Gas resistant membrane meeting all of the following criteria: • sufficiently impervious to the gases with a methane gas transmission rate <40.0 ml/day/m ² /atm (average) for sheet and joints (tested in accordance with BS ISO 15105-1 manometric method); • sufficiently durable to remain serviceable for the anticipated life of the building and duration of gas emissions; • sufficiently strong to withstand in-service stresses (e.g. settlement if placed below a floor slab); • sufficiently strong to withstand the installation process and following trades until covered (e.g. penetration from steel fibres in fibre reinforced concrete, penetration of reinforcement ties, tearing due to working above it, dropping tools, etc); • capable, after installation, of providing a complete barrier to the entry of the relevant gas; and • verified in accordance with CIRIA C735	2	The performance of membranes is heavily dependent on the quality and design of the installation, resistance to damage after installation and integrity of joints. For example, a minimum 0.4 mm thickness (equivalent to 370 g/m ² for polyethylene) reinforced membrane (virgin polymer) meets the performance criteria in BS8485:2015 If a membrane is installed that does not meet all the criteria in column 1 then the score is zero.

WATER MAINS RISK ASSESSMENT

Risks to water supply pipes are assessed using the document 'Guidance for the Selection of Water Supply Pipes to be Used in Brownfield Sites' published by the UK Water Industry Research (UKWIR). The methodology for the selection of water pipes in brownfield sites is below:





For sites where the preliminarily conceptual site model (PCSM) does not identify the potential for chemical storage either on or next to the site, there are no chemical restrictions on the selection of pipe selection material.

The guidance recommends that if known, samples should be taken along the route of the water mains. At the time of any intrusive investigation the route of the water mains is generally unknown, hence the guidance recommends that samples are taken across the site.

Table 1: Pipe Selection Table

	Pipe Material					
	All thresholds are in mg/kg					
Contaminant	PE	PVC	Barrier Pipe (PE-AL-PE)	Wrapped Steel	Wrapped Ductile Iron	Copper
Extended VOC suite by purge and trap or head space and GC-MS with TIC	0.5	0.125	Pass	Pass	Pass	Pass
Total BTEX and MTBE	0.1	0.03	Pass	Pass	Pass	Pass
SVOC's TIC by purge and trap or head space and GC-MS with TIC (aliphatic and aromatic EC5-EC10)	2.0	1.4	Pass	Pass	Pass	Pass
Phenols	2	0.4	Pass	Pass	Pass	Pass
Cresols and chlorinated phenols	2	0.04	Pass	Pass	Pass	Pass
Mineral oil C11-C20 (aromatic/aliphatic EC10-EC16, aromatic EC16-EC21 and aliphatic EC16-35)	10	Pass	Pass	Pass	Pass	Pass
Mineral oil C21-C40 (aliphatic EC16-EC35 and aromatic EC21-EC35)	500	Pass	Pass	Pass	Pass	Pass
pH	Pass	Pass	Pass	Corrosive if pH<7 and conductivity >400uS/cm	Corrosive if pH<5, Eh not neutral and conductivity >400uS/cm	Corrosive if 5<pH>8 and Eh positive
Conductivity						
Redox						
SPECIFIC SUITE IDENTIFIED AS RELEVANT FOLLOWING SITE INVESTIGATION						
Ethers	0.5	1.0	Pass	Pass	Pass	Pass
Nitrobenzene	0.5	0.4	Pass	Pass	Pass	Pass
Ketones	0.5	0.02	Pass	Pass	Pass	Pass
Aldehydes	0.5	0.02	Pass	Pass	Pass	Pass
Amines	Fail	Pass	Pass	Pass	Pass	Pass

It can be seen that barrier pipe is suitable on all sites. Where metallic (steel, ductile iron or copper) pipes are to be used, information on the pH, conductivity and redox of the soils will be required to determine suitability. Where PE or PVC pipes are to be laid, information on the presence of organic contaminants identified in the PCSM will be required.

Stage 1 - Assessment Methodology Before Water Mains Alignment is Known

At the time of a Phase II site investigation the alignment of the water mains is generally unknown, and as part of the investigation the entirety of the site will be investigated. The contaminants subject to analysis will be guided by the preliminarily conceptual model, and only contaminants identified in the preliminary conceptual model will be subject to assessment, which will provide a preliminarily specification of water mains.

The site investigation data will be assessed against Table 1 above and a preliminarily assessment of the suitability of water pipe material will be made.

Stage 2 – Assessment Methodology Once Alignment of the Water Mains is Known

Once the alignment of the water mains is known, if cost effective, additional analysis can be undertaken along the alignment to determine if metallic, PE or PVC pipes would be suitable.

RISK TO CONCRETE IN THE GROUND

The risk to buried concrete is assessed in accordance with the BRE Special Digest 1:2005 – 'Concrete in Aggressive Ground'. Recommendations for the composition of concrete and supplementary protective measures (if required) are given on the basis of the assessment.

CURRENT GUIDANCE ON REMEDIATION

When risk assessment of the site has been completed and it indicates that remedial works are required, the main guidance in managing this process is set out in the EA Guidance on 'Land contamination risk management (LCRM)'. The stages of managing remediation are as follows:

- (a) Options Appraisal and develop Remediation Strategy;
- (b) Develop Implementation Plan and Verification Plan;
- (c) Remediation, Verification and Monitoring.

The Remediation Strategy sets out the remediation targets, identifies technically feasible remedial solutions and presents an evaluation of the options so that these can be assessed enabling that the most suitable solution is adopted. An outline of the proposed remedial method should be presented. Agreement should be sought of the appropriate statutory bodies for the Remediation Strategy before proceeding to the next stage.

The Implementation Plan is a detailed method statement setting out how the remediation is to be carried out including stating how the site will be managed, welfare procedures, health and safety considerations together with practical measures such as details of temporary works, programme of works, waste management licences and regulatory consents required. Agreement should again be sought of the appropriate statutory bodies for this Plan.

The Verification Plan sets out the requirements for gathering data to demonstrate that the remediation has met the required remediation objectives and criteria. The Verification Plan presents the requirements for a wide range of issues including the level of supervision, sampling and testing regimes for treated materials, waste and imported materials, required monitoring works during and post remediation, how compliance with all licenses and consents will be checked etc. Agreement should again be sought of the appropriate statutory bodies for the Verification Plan. On completion of the remediation a Verification Report should be produced to provide a complete record of all remediation activities on site and the data collected as required in the Verification Plan. The Verification Report should demonstrate that the remediation has met the remedial targets to show that the site is suitable for the proposed use.



APPENDIX D: DRAWINGS

FIELDWORK METHODOLOGIES

1.0 LIGHT CABLE PERCUSSION BORING

1.1 Description of Plant

Cable percussive drilling is the oldest and simplest form of drilling where advancement of the borehole is by hammering (percussion) a tool into the formation by cutting a hole or by bailing out the material. It is the most common form of drilling in the UK.

The type of rig is usually an "A" frame type which arrives on site pulled by a four-wheel drive vehicle. Some cable percussion rigs are fitted to lorry bases and these may offer rotary drilling as well. This system of drilling is very common for geotechnical investigations but is widely used on environmental projects as well. This technique is used mainly for boring into and sampling superficial deposits rather than bedrock. The boring equipment is simple in design and comprises a cable passing from a winch, over a pulley at the top of the rig's mast to the boring tools. The tools are lifted and dropped successively and, as they advance and the borehole is deepened, more cable is fed from the winch drum.

The boring tools are robust steel tubes with a solid weight fitted above them, around 1500 mm long and of diameters ranging from 140 mm to 300 mm. They are designed to sample the ground in that, as the open end hits the formation on the down stroke; material is forced inside and retrieved when the tool is withdrawn at the surface. Water is sometimes added to the borehole to assist in this. Different boring tools are available to suit different types of ground conditions. A shell (a round cylinder with a flap valve) is used in non-cohesive materials while a claycutter (with windows in its sides) is used in cohesive materials. When the ground contains layers of cobbles or boulders that inhibit the boring tools, a chisel can be used instead to break through and then boring resumes below.

As this technique is used mainly in soft ground conditions, the borehole may need to be lined with "casing" that is advanced at the same rate as the boring tools to maintain stability and minimise the entry of unwanted groundwater into the deepening borehole. In some circumstances, it may be necessary to use several different strings of casing and the more formations that are requiring sealing-off, the larger the diameter of casing that will be needed to start the borehole. Casings of 250 mm, 200 mm and 150 mm are conventional and it is the 150 mm diameter casing that is most commonly used. The technique may be used when there is a need to drill through an aquiclude into an aquifer. In these cases, the borehole is drilled in stages and at each change in casing diameter, a robust bentonite seal is placed at the base and allowed to rehydrate prior to further advancement of the borehole at the narrower diameter.

Soil samples can be taken for environmental and geotechnical purposes. "Bulk" disturbed samples can be taken from the drill cuttings and undisturbed samples can be taken using U38 or U100 sample tubes (denoting 38 mm and 100 mm diameters respectively with the latter also called U4 denoting 4 inch). In situ geotechnical tests such as SPT (Standard Penetration Tests) can also be carried out during drilling if required.

Cable percussion drilling is generally used for depths less than 40 m and typical drilling depths for ground contamination investigations are 5 m to 20 m. Significantly greater depths can be achieved from the rarer, very heavy duty, rigs.

"A" frame cable percussion rigs are fairly manoeuvrable as they are light but the length of the frame (6 m) prevents access to tight locations. Many contractors have "cut-down" mast rigs for access and operation in limited headroom locations if required. The method can generate considerable mess, particularly in soft clays and when shelling out sands and silts.

1.2 Personnel

All works are undertaken under the supervision of competent qualified personnel.

A cable percussion rig is operated by a two man crew, comprising a driller and a driller's second man.

Supervision of a cable percussive drilling contractor is carried out only by an experienced scientist/engineer that is familiar with this method of drilling and the way cable percussive drilling crews operate.

The scientist/engineer will be allocated to each rig and should be prepared to carry out or supervise closely, the majority of the "hands on" sampling of soils.

A drilling crews are BDA (British Drilling Association) accredited for cable percussive work, and have experience of working on a wide range of contaminated sites and is prepared to be flexible in terms of responding to the emerging conditions, sampling requirements, borehole design etc.

It is important that the supervising scientist/engineer double checks each measurement of borehole depth, gravel pack, bentonite seals etc.

1.3 Requirements

- Access within the site (for a towed drilling rig allow 2 m width and 12 m length;
- overhead clearance (allow 6.5 m for a rig when raised);
- available working area (allow an area of minimum 2.5 m X 6 m for the rig and the towing vehicle (usually a large four-wheel drive vehicle) will also need to have access. A general working area around the rig of is also desirable). Take into account the fact that the rig will be noisy and generate diesel fumes which may be a problem in areas confined between buildings, near public walkways etc.;
- availability of washdown facilities, with power and freshwater supply, for washing of the casing, boring tools etc. that can be accessed by the towing vehicle;

1.4 Method of Borehole Drilling

1. an appropriate location for the borehole is chosen and a "before" photograph may be taken. It may be necessary to protect the ground surface from contaminated arisings using plastic sheeting, wooden boards etc. and to use sand-bags or other methods to contain water as the borehole is drilled and arisings extracted;
2. any surface concrete is broken or cored through and a hand-dug "starter pit" may be required (e.g. to check that there are no pipes/cables etc at the drilling location). The Drill Supervisor or Second Man manoeuvres the drilling rig into position and the legs of the mast are locked into position using cross-bars at above head height. The general requirements for drilling, sampling, in situ tests and the design of the groundwater/gas monitoring installation (if needed) etc. are confirmed before the borehole is started. It is usually desirable, however for some flexibility to be maintained as the borehole is drilled and the conditions emerge;
3. a suitable boring tool is used to cut the start of the borehole and, at a suitable depth (usually less than 1 m), the first length of casing is established to which others are attached and progressively advanced as the borehole deepens;
4. as the borehole develops the scientist/engineer liaises with the drilling crew on precise sampling and groundwater measurement requirements and any in situ tests that are needed, but stands a safe distance back from and avoids obstructing the actual drilling process. Anyone approaching the rig, aside from the drilling crew, should do so only when the cable tools are at rest on the ground and all the time with an awareness of the safety of the rig itself, the equipment in the vicinity and the condition of the ground surface. All personnel should maintain a look out for anything that may affect the safety of the drilling exercise;
5. where there is need to construct the borehole in such a way as to protect, for example, an underlying aquifer the precise design is refined to reflect the emerging conditions;
6. as the borehole progresses, any retrieved spoil that is not required for samples is either stockpiled temporarily close to the borehole or placed directly into bags. Whichever method is chosen, the arisings are stored in such a way that any that are suitable can be used as backfill material at the appropriate time, while those that are not, are stored temporarily in a skip on the site and then disposed of appropriately;
7. once the desired depth is reached, final measurements of the depth of the hole and groundwater level are taken. If a groundwater/gas monitoring installation is required, this is constructed carefully by the drilling crew under instruction from the scientist/engineer and the top of the borehole fitted with an appropriate cover. Re-instatement works that are needed are carried out (arrangements for this should be made before starting the investigation);
8. irrespective of whether formal re-instatement works are to be carried out, it is important that the borehole and surrounding area are left in a safe condition. Open boreholes and drilling equipment should not be left unattended unless securely roped, coned or fenced off (safety issues are covered below).

1.5 Method of Borehole Decommissioning

If required, a borehole is decommissioned in line with the guidance contained in Environment Agency Report "Decommissioning Redundant Boreholes and Wells", insofar as it can be applied to this site.

The principal objective of the decommissioning is to remove all constituents of the standpipe installation, and to restore the soil structure to match as closely as possible its predrilled condition.

The decommissioning will follow the following sequence:

1. Removal of wellhead installation – concrete surround to cover, flush cover
2. Pull out 50mm ID HDPE – pulled from upper level and may break at intermediate joint.
3. Bore out full depth of borehole using shell and auger tools – using clean drilling techniques and commencing in 200mm diameter casings to 10mbgl and thereafter reducing to 150mm diameter through a bentonite plug. All removing standpipe sections and bentonite / gravel surround will be removed in the boring process
4. Restore lithology in the borehole by the initial placement of clean imported non limestone 20mm single size gravel, from the base of the borehole. The casing will be progressively pulled to allow the gravel to occupy the borehole volume. The placement of the gravel will be followed by the ramming in of boulder clay at the base of the borehole as the casing is further progressively withdrawn (clay recovered from offsite borehole source). The borehole will then be restored to ground level by the placement of non limestone pea gravel. The site will be restored by topsoil and seeding.
5. All arisings from the borehole will be bagged and transported offsite for disposal at a licensed landfill.

2.0 DYNAMIC SAMPLING

2.1 Description of Plant

Window sampling is a percussive method of creating small diameter boreholes. Mostly the technique is achieved using hand-held equipment but some small drilling rigs have the capacity for window-sampling and the power of the rig enables window samplers to be driven to, and extracted from, greater depths compared to the manual technique.

A window sampler is a high tensile steel tube with a hardened cutting shoe to penetrate hard materials. Each sampler is usually 1 m or 2 m long with a series of "windows" or slots cut in the wall of the tube through which to view or extract soil samples. Samplers are driven down into the ground using a percussive hammer. A full set of window samplers usually consists of around four samplers ranging in diameter from 80 mm down to 35 mm. These are used systematically, starting with the widest and subsequently at reducing diameter to the required depth or limit of the technique. The depth limit tends to be around 8 m to 10 m although the technique is usually used to a maximum depth of around 5 m. In practice, the limiting factor tends not to be how deep the samplers can be driven in but rather whether the ground conditions are such that they may then be pulled back out. Coarse dense gravels, in particular, can grip the samplers and make extraction extremely difficult. The driller will assess the conditions at each location individually.

The start diameter is dictated by the ground conditions i.e. the softer the conditions, the wider the sampler set that can be driven in. Typically, however, a 60 mm to 80 mm diameter start sampler will be used, reducing to around 35 mm by around 4 m to 5 m depth. The full samplers are either jacked out manually or pulled from the hole using a hydraulic jacking system.

A full sampler will reveal a complete or partial ground profile although guidance from the driller will be needed on any compression that may have occurred and resulted in, for example, a 1.5 m sample occupying a 1 m space in the sampler. With some window sampling systems, samples can be recovered in a thin walled transparent liner placed inside the steel tubes. The liner is removed for visual inspection or capped at each end for transporting to the laboratory. Whatever system is used, the quantity of soil within the sampler is small and, particularly where the analytical suite is extensive, a sample may have to be taken from a 0.5 m or so section to ensure sufficient quantity. The advantage, however, is that once soil is taken for samples and backfilling purposes, there is rarely any excess requiring disposal.

Narrow diameter groundwater/gas monitoring installations can be constructed in the borehole once all samplers are withdrawn. Whilst the diameter of the standpipe is ultimately dictated by the diameter of the smallest (and lowest positioned) sampler, in practice it is usually possible to install a 19 mm or 35 mm standpipe with a fine gravel pack surround. With some systems, it is possible to drive a water well in through unsampled ground using the hammer unit.

This method is not suitable where there is a need to drill through an aquiclude into an aquifer as there is no way of protecting the aquifer from downwards migration of any contaminants from the ground above the aquiclude during drilling.

The equipment is generally brought to site in a van or four-wheel drive vehicle and from then on, it can be carried by hand around the site. In many circumstances the fact that this is largely a manual method is its advantage over even the smallest drilling rigs. Window sampling causes minimal disturbance to the ground surface (e.g. useful for investigations inside buildings, in a landscaped car park or between the sleepers of rail lines. The method can be used where access is very restricted (e.g. small operational sites and in gardens). It can also achieve rapid coverage to shallow depth (e.g. useful for establishing the thickness of a landfill cap over a large area).

2.2 Personnel and Equipment on Site

Two window samplers will be operated by an experienced driller. Operatives will be provided with safety boots, approved HV jackets/coats, hard hats, safety goggles, disposable coveralls, disposable gloves, ear protection and dust/vapour masks, which will be used where appropriate. There will also be various portable tools on site, such as a breaker, spades, tapes, hand tools such as screwdrivers, wrenches. In addition, small amounts of diesel fuel will also be present on site.

2.3 Method of Dynamic Sampling

Sequence of events is as follows:

- an appropriate location for the window sampler borehole ("the borehole") is chosen and a 'before' photograph may be taken. Any surface concrete is broken or cored through. It is usually unnecessary to protect the ground surface as the method generates hardly any mess. However, if needed, samplers can be placed on plastic sheeting during sampling to protect particularly sensitive ground surfaces.
- the general requirements for drilling, sampling, in situ tests and the design of the groundwater/gas monitoring installation (if needed) etc. are confirmed before the borehole is started. It is usually desirable, however for some flexibility to be maintained as the borehole is drilled and the conditions emerge;

- the first, and widest, sampler is driven fully into the ground and withdrawn. The next narrower one is pushed through the open hole to its base and then driven, in turn, into the soil at the bottom. This sequence is repeated using progressively smaller diameter samplers down to the required depth or limit of the technique in the particular ground conditions encountered;
- as the borehole develops the scientist/engineer liaises with the drilling crew on precise sampling and groundwater measurement requirements, but avoids obstructing the actual drilling and jacking out processes. All personnel maintain a look out for anything that may affect the safety of the drilling exercise;
- if there is spoil in excess of that needed for sampling/backfilling purposes, this is placed directly into bags and stored in such a way that they may be disposed of appropriately once the investigation has finished;
- once the desired depth is reached, a groundwater/gas monitoring installation is constructed carefully by the driller (if required) and the top of the borehole fitted with an appropriate cover. If an installation is not needed, the hole is backfilled with clean suitable material. This can be any spoil in excess of that required for sampling (if suitable), clean sand/gravel (if appropriate) or bentonite to prevent future downward migration of contaminants through the hole;
- On many sites it is unlikely that any re-instatement works will be needed. If they are (e.g. concrete/tarmac repair), these are carried out (arrangements for this should be made before starting the investigation). The borehole and surrounding area must be left in a safe condition. Drilling equipment should not be left unattended, not least due to its portability (safety issues are covered below).

2.4 Operational Requirements

- access to and within the site – window sampling is a method that is particularly suited to sites where access is very constrained and inaccessible for other drilling methods. Essentially, a window sampler borehole can be drilled if there is space for two people and equipment the size of a small suitcase held initially just above head height. In exceptionally small spaces, the equipment can be operated by one person but this is not ideal;
- overhead clearance - similarly, the overall height of the equipment tends to be less than for many other drilling methods (allow 2.5 m);
- available working area -see notes above (while a borehole can be drilled very small spaces, if possible, allow a working area of around 2 m by 3 m to accommodate the drilling operations, the samplers on the ground and ancillary equipment). The hammer unit will generate noise similar to that of lawnmower and this should be considered when working in locations close to members of the general public;
- availability of washdown facilities, with power and freshwater supply, for washing of the samplers etc. (can be accessed on foot);
- knowledge of the location of buried services is essential for the safety of the drilling crew.

2.5 Hand Held Window Sampling

Dynamic sampling boreholes may be driven using a hand-held jack-hammer powered by a petrol or diesel drive hydraulic power pack.

All requisite equipment may be transported to site in a small van.

The works comprise of the driving of a series of reducing diameter steel sampling tubes, each of 1m length. The tubes are of nominal diameters 101mm, 87mm and 77mm. Normal practice is that each tube be used for sampling a 2m section of ground. The normal depth range of hand held dynamic sampling is 6m.

The first tube is driven to 1mbgl and withdrawn from the ground using purpose made lever jacks. The soil within each tube is contained in a perspex liner which is withdrawn from the steel tube and set aside for splitting, logging, testing, and subsampling as appropriate.

The process is repeated by adding an extension rods to the top of the sample tube and lowering the assembly down the borehole, before commencing the driving at the next depth increment.

The success of the method is dependant upon the borehole remaining open as the succession of 1m long samples is taken and withdrawn.

Two operatives are required, an experienced driller and a drillers second man. The operatives will be equipped with safety boots, approved HV jackets/coats, hard hats, safety goggles, disposable coveralls, disposable gloves, ear protection and dust/vapour masks, which will be used where appropriate. There will also be various portable tools on site, such as a breaker, spades, tapes, hand tools such as screwdrivers, wrenches. In addition, small amounts of diesel / petrol fuel will also be present on site.

Each proposed sampling location will be positioned to be clear of all services shown on record drawings. The absence of services on drawing records for the proposed positions is not a basis for presumption that the locations are service free. A service trench will be excavated by the client to confirm that the position is clear of all services. The trench will be backfilled with services and borehole location clearly marked on the ground by the client. Where the client has not excavated a service trench each location is scanned by CAT service locator before manual excavation of a service clearance pit, which extends to approximately 1.2mbgl. If any services are encountered the excavation is backfilled and exploratory location repositioned.

On completion to the requisite depth, boreholes are either backfilled with arisings/grout or, if terminated at rockhead, retained for further rotary rock drilling. In some instances a monitoring standpipe is installed in the hole. Monitoring standpipes comprise a 1.0m upper section of 50mm diameter HDPE plain pipe surrounded by a bentonite/grout seal, atop 50mm diameter HDPE slotted pipe sections in a pea gravel surround, The installations are topped with a gas valve and protected by flush covers set in concrete.

TRIAL PIT EXCAVATIONS

3.1 Description of Plant

Trial pits are usually excavated using a JCB 3CX excavator/backactor. However, if ground conditions are suspected to be more difficult or the trial pits are expected to exceed 5.0m, a light tracked excavator (weighing up to 14 tonnes) may be used.

If a JCB 3CX excavator is used it will be driven to site by the operator.

If a tracked excavator is to be used, it will be transported to/from site on a low loader. The machine will be off loaded under the supervision of a banksman, and the machine will track onto the site. All movements and excavations made on site will be under the supervision of a banksman and engineer.

3.2 Description of Method

Trial pits are exploratory holes excavated into the ground by hand or by mechanical excavator. Compared to boreholes, trial pits allow faster inspection of a larger proportion of the groundmass and are a means of obtaining larger quantities of soil samples. Trial pits can be used to obtain groundwater samples if conditions are such that sufficient can collect in the base of the pit in the time available, without risk of ground instability and if samples obtained in this way are technically suitable for the purposes of the investigation. Trial pits can also provide a means of installing rudimentary gas monitoring standpipes to supplement ones constructed in boreholes.

Trial pits can be excavated to a variety of sizes to suit the requirements of the investigation e.g. narrow and very deep to investigate within a landfill or a series of shallow and long "trial trenches" to establish the extent of an infilled area. However the typical size of a trial pit is around 2 m long by 0.5 m – 1m wide by up to 5 deep. Trial pits can be hand dug to 1.2 m, but the usual method is to use hired mechanical plant with a skilled operator. The plant most commonly used is a wheeled backhoe loader (using the backactor arm) which is frequently referred to as a "JCB", irrespective of the actual make. With a conventional digging arm these can achieve depths of around 3.5 m and with an extendable arm they can achieve depths around 5 m. Other types of excavators can be used to suit certain situations. For example, a slew boom hydraulic excavator may gain access to areas too constrained for a backhoe loader. Where there is a high risk that the ground surface will cause puncture to vehicle tyres (for which the hirer pays) then tracked, rather than wheeled, excavators may be more suitable. Tracked vehicles can also be useful where it is desirable to spread weight on soft ground. However, these vehicles have to be brought to site on a low-loader. Very large machines can be hired to excavate pits deeper than 5 m. The condition of machines varies considerably and old machines and those that have been used for more than an average amount of breaker work (for breaking through concrete and other hard layers) may be considerably slower and risk of break down is greatly increased. This can seriously impact on a site investigation programme.

The width of a mechanically excavated trial pit is dictated by the size of excavator used. Wider buckets (around 1 m) allow inspection of a larger proportion of the ground but generate very large volumes of spoil and, where concrete is present on the ground surface, require more time to be spent breaking through. Narrow buckets (around 0.5 m) create less ground disturbance but it can be difficult to see the pit walls at depths below around 4 m. A bucket size between these two extremes is usually appropriate. Breaker units vary in size and, particularly, in condition. It is usual to specify precise requirements to the plant hire company.

The operating arm and connecting parts of all excavators need considerable lubrication during the working day. An awareness of this on the part of the supervising scientist/engineer is necessary, particularly during sampling activities. In addition, it is common practice for finished tubes of lubricant to be discarded on the ground or even into trial pits before backfilling. The unacceptability of this may need to be stressed to the excavator driver at the outset of the investigation.

3.3 Sequence of Events

- an appropriate location (clear of underground services etc) for the trial pit is chosen and a "before" photograph may be taken. It may be necessary to protect the ground surface from contaminated arisings using plastic sheeting, wooden boards etc. and to use sand-bags or other methods to contain water as the pit is dug;
- the excavator driver manoeuvres the excavator into a suitable position for the trial pit location, taking into account factors such as the position of the sun/other bright lights (good visibility is essential) and wind direction (in relation to vehicle exhaust fumes, ground gases, odours etc). Any surface concrete/other hard cover is broken out to a suitable size and the excavator changes from breaker to bucket. As the trial pit is dug, the scientist/engineer directs the speed/depth of excavation and also maintains a constant look out for anything that may affect safety of the trial pitting exercise. Under no circumstances should anyone enter a trial pit;

- as the trial pit progresses, the spoil is segregated in such a way that it can be used to backfill the pit in roughly the same order that it was removed. Photographs, depth measurements and samples are taken as required (during this time the excavator stands still with the bucket on the ground i.e. hydraulics at rest). Anyone approaching a trial pit should do so on the short side opposite the excavator and all the time with an awareness of the pit's stability and the surrounding ground conditions. (see section below on practical safety and environmental protection measures about safe distances for placement of excavated spoil, safe working near trial pits etc.).
- once the desired depth or limit of the machine is reached, final measurements and photographs are taken (the driver should not be asked to hold the photograph identification board). The trial pit is then backfilled using the original spoil which is emplaced in roughly the same order to the original (alternatively, clean sand/gravel may be used). A gas monitoring standpipe may be installed in the trial pit. When backfilling is completed, an "after" photograph may be taken; re-instatement works that are needed are carried out (arrangements for this should be made before starting the investigation). Irrespective of whether formal re-instatement works are to be carried out, it is important that the backfilled trial pit and surrounding affected area are left in a safe condition. Open trial pits should NEVER be left unattended unless securely fenced off (safety issues are covered below).

3.4 Personnel and Equipment on Site

In addition to the machine operator the crew will comprise of a banksman to oversee machine movements, fix and relocate temporary safety barriers, ensure that reinstatements are safe pending final paving etc, and an engineer to direct the positioning of the pits, log the exposures and undertake soil sampling and PID scanning.

Other requirements are:

- Access to the site and within the site (for a backhoe loader allow 2.7 m width for access through gates and more for larger machines – check with the plant hire company);
- overhead clearance (allow 6.5 m for a backhoe loader and more for larger machines);
- available working area (allow an area of minimum 15 m X 15 m for a backhoe loader and more for larger machines);
- availability of washdown facilities, with power and freshwater supply, for the excavator bucket that can be accessed by the excavator;
- ability of ground to support weight of plant (a backhoe loader weighs around 9 tonnes while larger machines can weigh 45 tonnes).

3.5 Method of Trial Pit Excavation

Each proposed trial pit location will be positioned to be clear of all services shown on record drawings. The absence of services on drawing records for the proposed positions will not be basis for presumption that the locations are service free. Each location will be scanned by CAT service locator before and continuously during the excavation.

Materials will be carefully excavated from each trial pit in thin layers, and the arisings stockpiled adjacent to the excavation. On encountering each new stratum the excavation will be stopped, while physical measurements and, where relevant, soil samples taken. Soil samples will be collected in polythene tubs and amber glass jars, which will be sealed and labelled before shipment to the laboratory. If groundwater is encountered, then excavations will be stopped while physical measurements and groundwater samples are taken in amber glass bottles.

All trial pits will be backfilled immediately after excavation, with the materials being replaced as far as possible in the reverse order to which they have been excavated.

Excavated materials will be thoroughly tamped as each layer is placed to produce a dense reinstatement matching, as near as possible, the profile of the surrounding ground. Excess spoil (if any), will be removed offsite for disposal.

Hand Held Trial Pits

Foundation and/or service exposure pits may be manually excavated using picks, spades and hand-held power tools powered by a petrol or diesel drive hydraulic power pack.

A minimum of two operatives form the team. The operatives will be equipped with safety boots, approved HV jackets/coats, hard hats, safety goggles, disposable coveralls, disposable gloves, ear protection and dust/vapour masks, which will be used where appropriate. There may also be various portable tools on site, such as a breaker, spades, tapes, hand tools such as screwdrivers, wrenches. In addition, small amounts of diesel / petrol fuel will also be present on site.

For foundation exposure pits, each proposed pit location will be positioned to be clear of all services shown on record drawings. The absence of services on drawing records for the proposed positions will not be basis for presumption that the locations are service free. Each location will be scanned by CAT service locator before commencement with the dynamic probing rig.

For service exposure pits, the excavations will proceed with great care, trimming the soil cover in thin lenses, rather than punching in digging tools. The excavation will be continuously scanned by CAT scanner.

All exposures will be logged and drawn by an experienced engineer / technician, noting depths, dimensions, colours etc.

Excavations will be backfilled on completion, compacted and struck level, with no trip hazards. Permanent reinstatements may be made subject to client requirements.

3.6 – Hand Held Trial Pits

Foundation and/or service exposure pits may be manually excavated using picks, spades and hand-held power tools powered by a petrol or diesel drive hydraulic power pack.

A minimum of two operatives form the team. The operatives will be equipped with safety boots, approved HV jackets/coats, hard hats, safety goggles, disposable coveralls, disposable gloves, ear protection and dust/vapour masks, which will be used where appropriate. There may also be various portable tools on site, such as a breaker, spades, tapes, hand tools such as screwdrivers, wrenches. In addition, small amounts of diesel / petrol fuel will also be present on site.

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All exposures will be logged and drawn by an experienced engineer / technician, noting depths, dimensions, colours etc.

Excavations will be backfilled on completion, compacted and struck level, with no trip hazards. Permanent reinstatements may be made subject to client requirements.

Soil, Water and Gas Sampling/Monitoring Methodologies

Sampling Of Soil For Contamination Assessments

Soil samples are recovered in contamination site investigations from either dynamic sampling boreholes or trial pits.

Sampling equipment (steel casing tubes, spatulas etc) is cleaned using water between sample positions to avoid cross contamination. Gloves are changed on completion of each sampling location)

Dynamic Sampling Boreholes

Samples are recovered in relatively undisturbed 1m long plastic tubes. Once extracted the tube is immediately split and logged. Samples are taken from each strata and from 0.1mbgl, 0.45mbgl, and 1.0mbgl. The number/locations of samples to be analysed will be made on completion of the fieldwork. Duplicate subsamples are taken and headspace analyses by PID (to the methodology in CIRIA C665 – given below) is undertaken. This data will be used to target VOC analyses.

Samples are stored in an electric cool box with ice packs.

Trial Pits

Samples are taken from the bucket of an excavator and placed in airtight containers. Each container is uniquely labelled with the Project No / Trial Pit No / Depth increment/ Date Sampled. The samples are then immediately placed in an electric cool box chilled by ice packs, and the boxes are sealed for transportation to the laboratory.

Sampling Containers

Subsamples from boreholes or samples from trial pits comprise of a 1kg plastic tub and a 500g amber glass jar. When possible, samples will be collected from the site, and if this is not possible samples will be transported to the regional office and stored in a refrigerator until collection. Samples are packaged with ice packs immediately prior to transit.

Chain Of Custody Records

A Chain of Custody Record (CoC) is sent with the batch of samples. A copy of the CoC is also emailed to the laboratory prior to sample delivery. **A copy of the CoC is included with the analyses certificates.**

Headspace Analyses

Duplicate subsamples of ALL samples selected for laboratory analysis, are taken for headspace analyses, using a Photo Ionisation Detector (PID). In the test method, an amber glass jar is half filled with soil, and the lid is sealed with aluminium foil secured by an elastic band. The jar and contents are agitated for 30 seconds and left for a minimum of 30 minutes out of direct sunlight for the headspace to achieve equilibrium. The PID then pierces the seal and the maximum reading is recorded. This provides a qualitative method which results in a representation of the presence of volatile organic compounds in the soil. The numerical output cannot be directly compared to measured soil concentrations of CoC.

The prevailing weather conditions, and ambient temperature are also recorded.

The PID headspace results are recorded on the exploratory borehole or trial pit logs.

Laboratory VOC analyses will be obtained where the PID headspace data indicate a potential presence of volatiles.

Sampling Of Water in Standpipes

Water is sampled from standpipes installed during borehole drilling. On completion of the construction of the standpipe, the installation is developed by removing approximately 10 x the internal volume of the installation. The volume of water removed is recorded. The standpipe is then left for a week for hydraulic equilibrium to be restored.

Prior to sampling the standpipe, the depth to the water table, and the depth to the base of the standpipe are monitored using an electronic dipmeter. In circumstances where free phase product is suspected to be present, then an 'Interface Meter' is used to determine the free phase film thickness.

A minimum of 3 x the standpipe volume is then removed. The pH of the water is then monitored and the sample is taken when the change in pH between any two consecutive standpipe extracts is less than 10%. The volume of water removed is recorded.

A sample comprises of a minimum of 3 litres. Two litres are taken in amber glass bottles, and one litre in a plastic bottle.

To avoid cross-contamination one bailer is used per position.

The samples are uniquely labelled with Project Name / Project No / Borehole No / Depth / Date Sampled. They are placed in a cool box chilled by ice packs, and the containers are sealed for transportation to the laboratory.

Once the samples are received in the **DEMETER ENVIRONMENTAL** laboratory, the samples are stored in a refrigerator and returned to the cool boxes once collected.

Other data recorded in the sampling comprises:

- Volume of water removed during development of well
- Volume of water removed during purging of the well
- Results of on-site pH analyses
- Sample appearance – colour, suspended solids

Monitoring Of Gas

Prior to embarking on a gas-monitoring round, all equipment is checked for functionality and the calibration status is confirmed. Barometric pressure of the site (based on nearest Met Office station or other weather station) will be recorded thought the monitoring regime and monitoring visits will be undertake, where practicable, during periods of falling barometric pressure.

At the commencement of the monitoring round, the prevailing weather conditions, air temperature, barometric pressure and direction of movement of barometric pressure are recorded.

The flow meter is first attached to the standpipe valve, and the flow rate is measured (peak and steady flow) for 1 minute. The results are recorded in l.hr^{-1} . The flow meter tube is protected from the effects of wind by aligning the exhaust downwind.

Following measurement of borehole flow rate, the installation is left for a minimum of 10 minutes for the headspace to restore equilibrium.

Once the gas in the installation has regained equilibrium, the gas analyser is connected and monitoring commences. The peak and steady state readings for CH_4 , CO_2 , CO, H_2S and CO are recorded. The steady state is monitored for a minimum of one minute, and possibly up to a maximum of 10 minutes where fluctuations continue.

When the monitoring is complete, the depth to the water table, and the depth to the base of the well are monitored using an electronic dipmeter. In circumstances where free phase product is suspected to be present, then an 'Interface Meter' is used to determine the free phase film thickness.

Decontamination of Equipment

Decontamination of equipment was carried out at appropriate times throughout the site work in order to minimise the potential for cross-contamination of materials. Equipment decontamination measures were performed in the field between each sampling location and prior to equipment storage on completion of the work.

Drilling decontamination incorporated the cleaning of equipment using a brush to remove particulate matter and surface film while sampling equipment decontamination incorporated equipment rinsing and cleaning with potable tap water.

Collection, Preservation and Transport of Samples

Soil- Environmental

Samples to be analysed for organic compounds were collected and sealed in glass jars. In order to prevent the loss of volatile organic compounds, the air space was kept to a minimum by filling the jars as far as reasonably practicable. Samples to be analysed for metals were collected in plastic containers.

Disposable gloves were worn and changed between each sample taken to prevent cross contamination. The soil samples were stored in a cool box with ice packs and dispatched to the laboratory on the day of collection where possible. All sample details were recorded on the laboratory chain of custody documentation.

Soil- Geotechnical

The undisturbed geotechnical samples were collected in appropriate liners and were sealed on site to prevent the loss of moisture. The disturbed samples were placed in sealed and correctly labelled plastic tubs or bags as appropriate. All geotechnical samples were dispatched to the geotechnical laboratory for testing with a completed chain of custody.

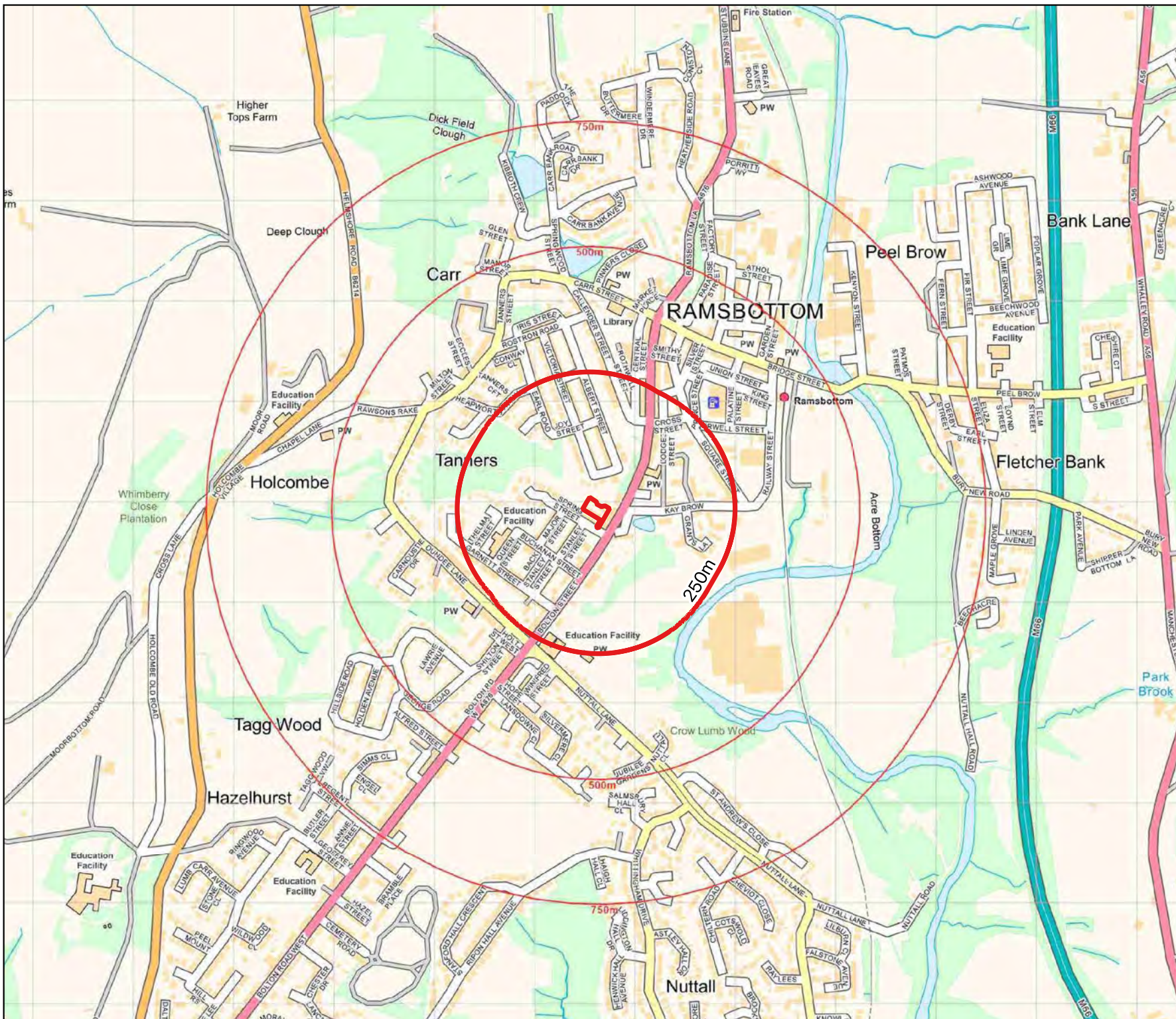
Water

Glass jars and vials were used for the collection of all groundwater samples to be analysed for organic compounds. Containers for volatile analysis were filled so that minimal air space remained prior to sealing the container. This, in combination with a low storage temperature, ensures that volatile compounds that may have been present within the sample were not lost to the headspace prior to analysis.

The water samples were stored in a cool box with ice packs and dispatched to the laboratory on the day of collection. All sample details were recorded on the laboratory chain of custody documentation.



APPENDIX E: SITE PHOTOGRAPHS AND PHOTOGRAPH KEY PLAN



Demeter Environmental Ltd

Liverpool Office:

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Brighton Office:

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Brighton, East Sussex

BN3 7BD

Tel: 01273 741 727

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Drawing 1

Site Name: Spring Street
Sawmills

Site Location

Scale: 1:10,000 at A4



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Tel: 01273 741 727

Email: enquiries@demeter-environmental.co.uk

Drawing: 2

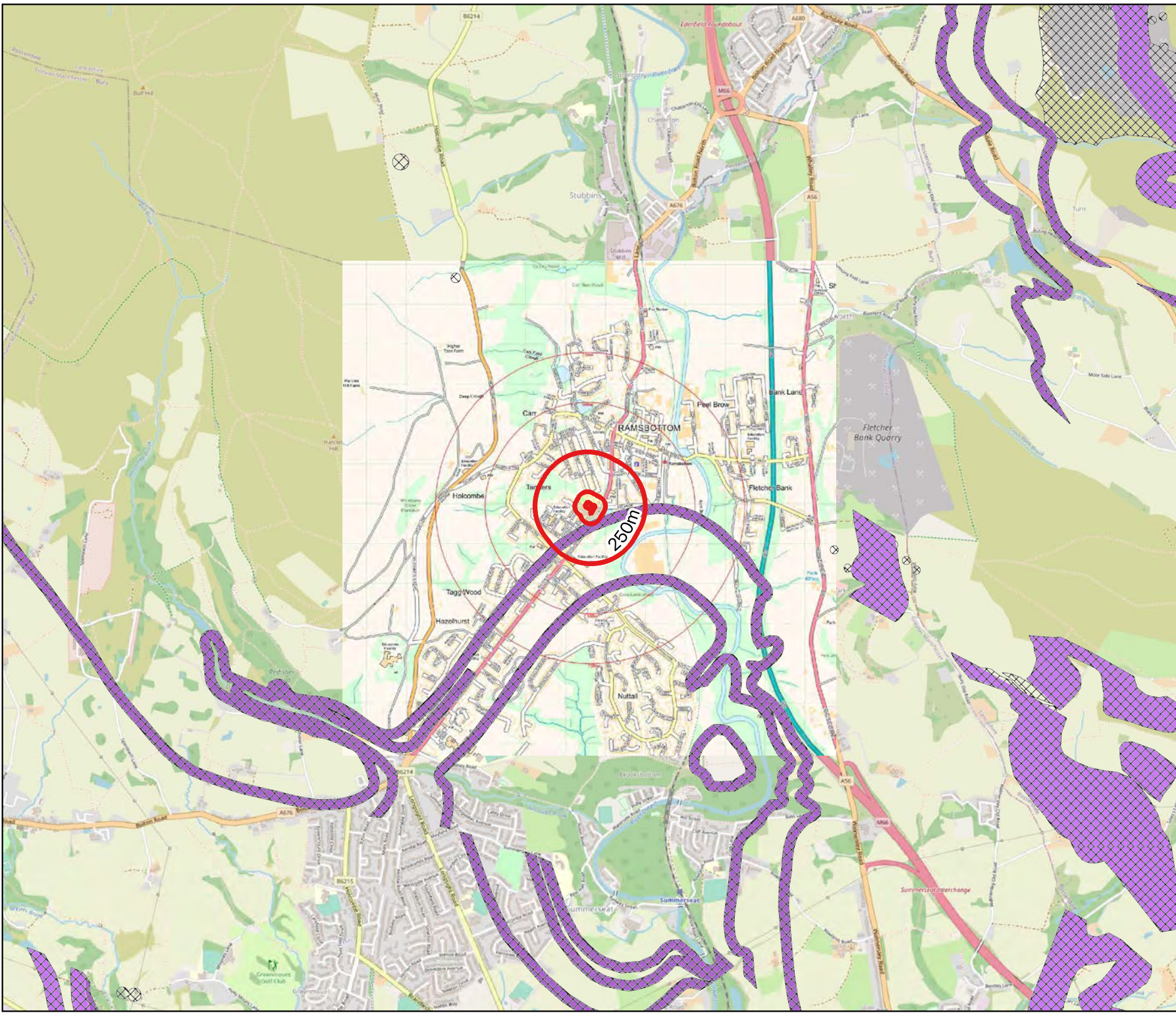
Site Name: Spring Street
Sawmills

Aerial Plate

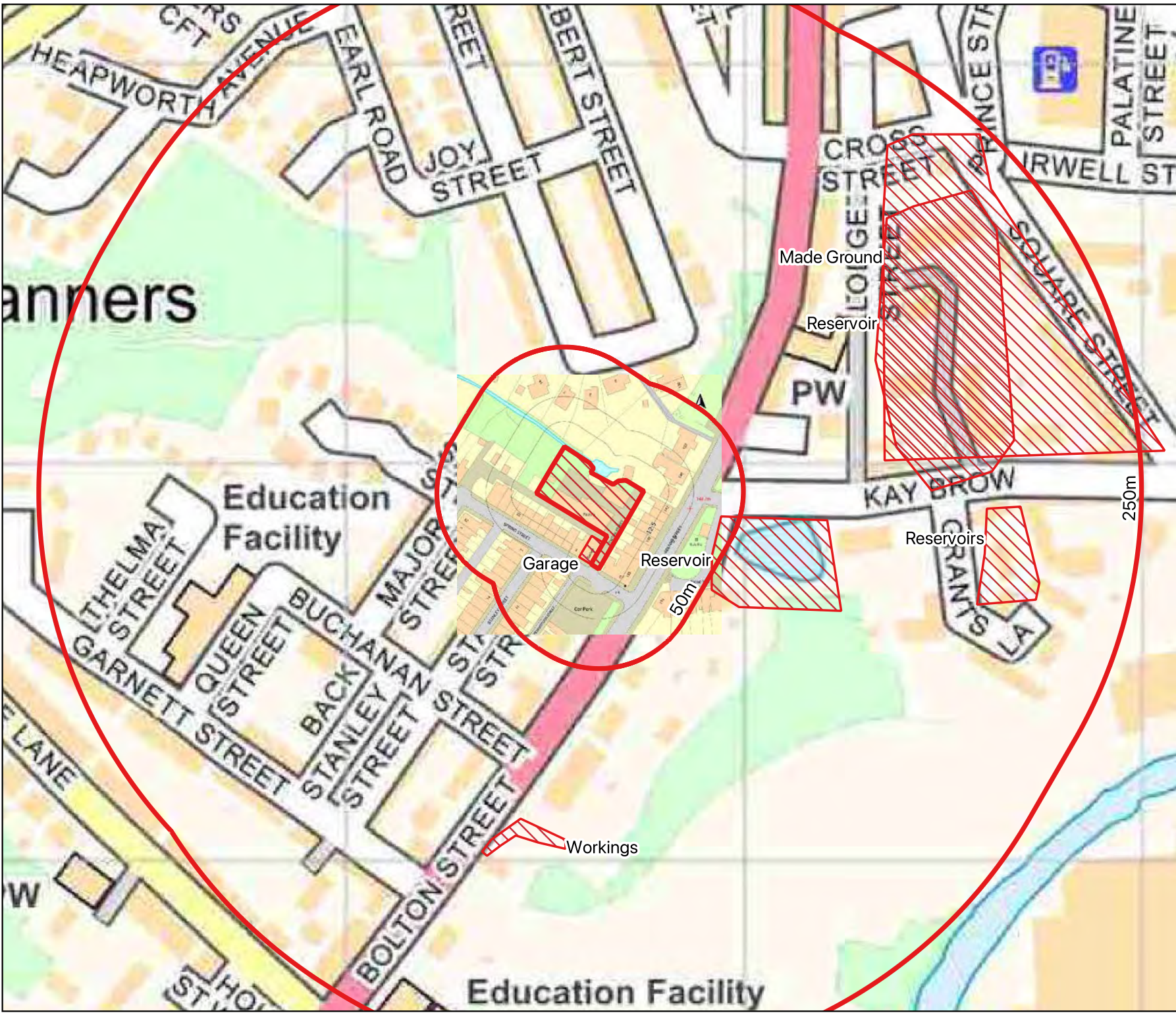
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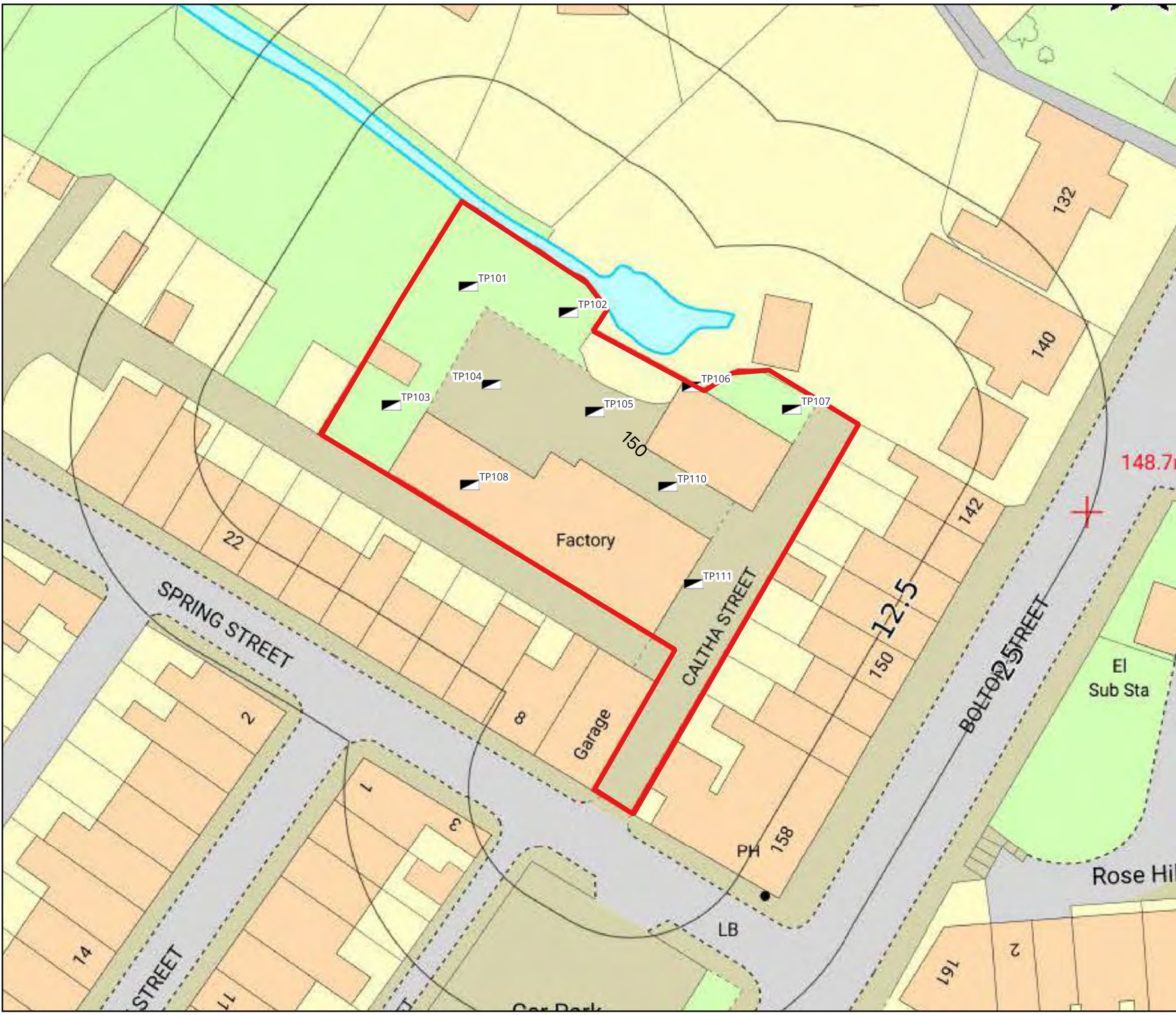
	
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Brighton, East Sussex	
BN3 7BD	
Tel: 01273 741 727	
Email:	enquiries@demeter-environmental.co.uk
Drawing 3	
Site Name: Spring Street Sawmills	
Site Layout	
Scale: 1:500 at A4	



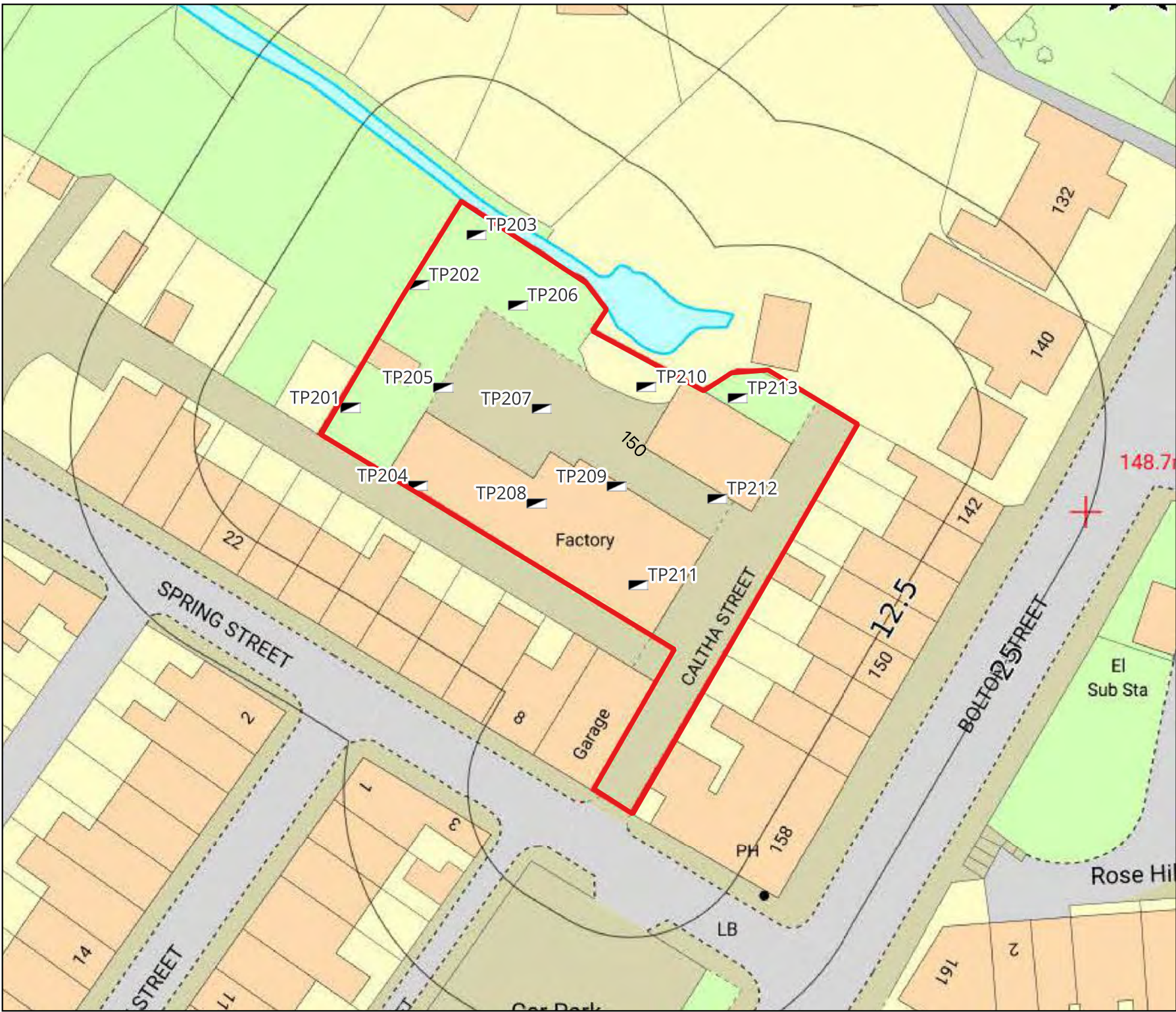

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Drawing 4
Site Name: Spring Street Sawmills
Development High Risk Area
Scale: 1:25,001 at A4



Scale: 1:2,500 at A4



		
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Drawing 4		
Site Name: Spring Street Sawmills		
Proposed Site Investigation Layout		
Scale: 1:500 at A4		



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Drawing 5

Site Name: Spring Street
Sawmills

Site Investigation Layout
November 2024

Scale: 1:500 at A4

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0 1 2 3 m

Former Spring Street Sawmills
Spring Street
Ramsbottom BL0 9JQ

scale 1:50@A1
July 2025

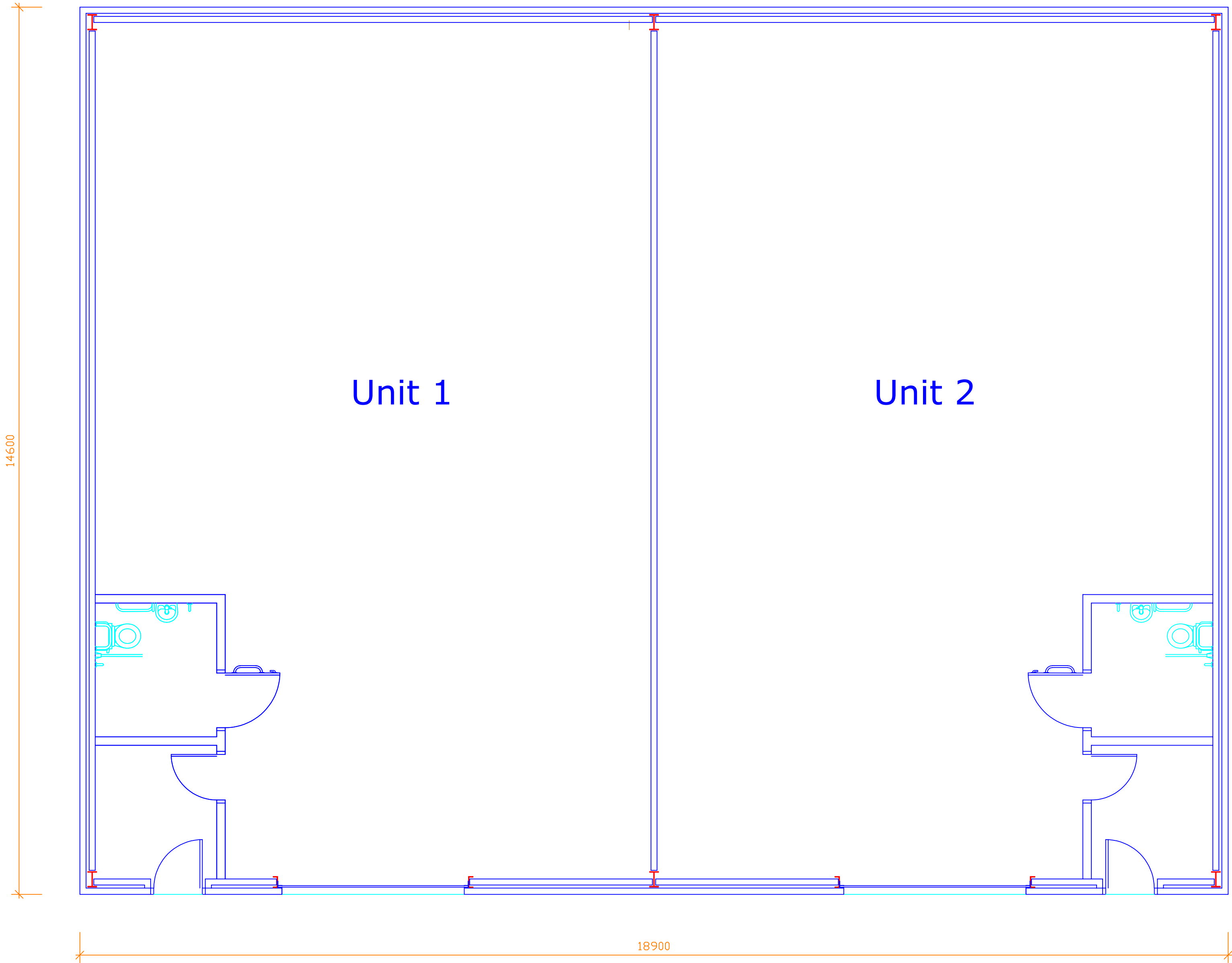
AW6-03

Proposed Units 1 & 2

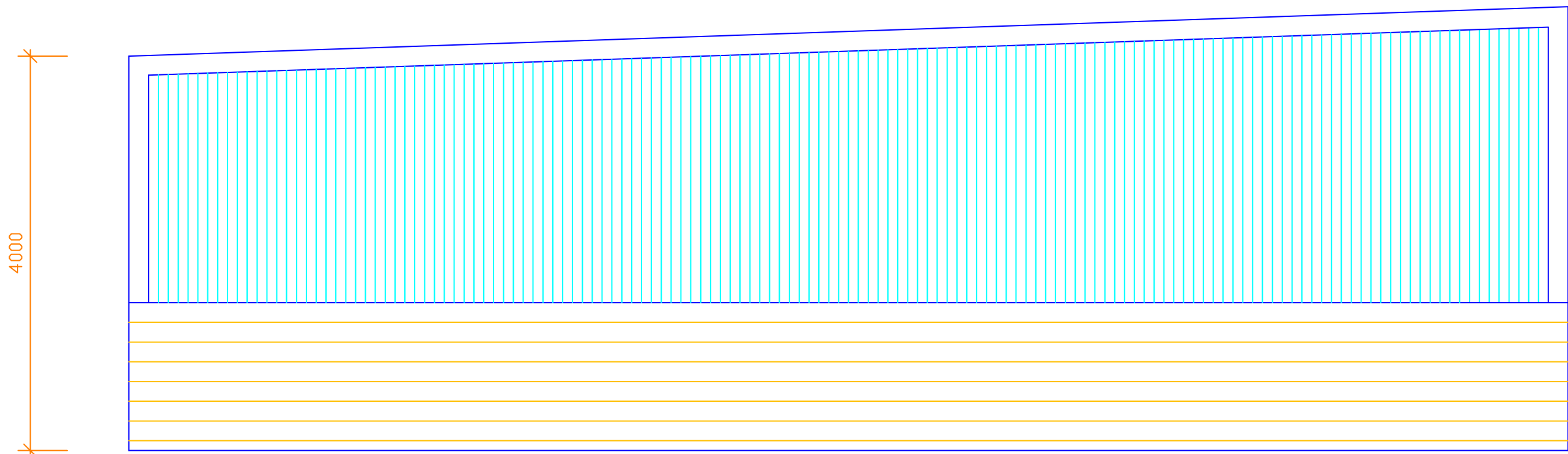
PPY design Ltd

2 Helmsore Road, Holcombe Village
Ramsbottom, Lancashire BL8 4PA

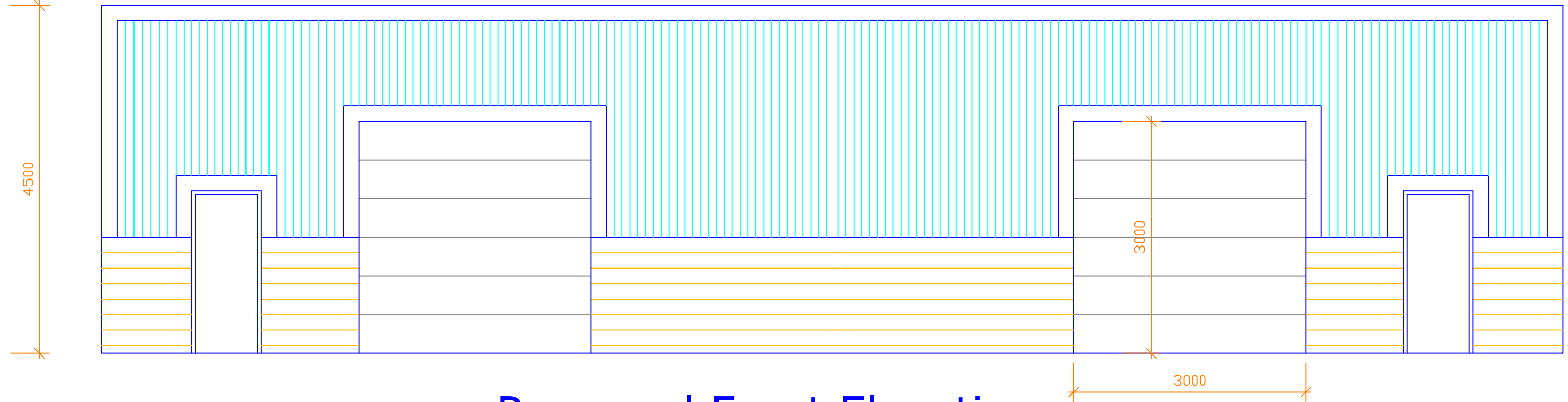
Gary Dearden BAC(hons) DipArch RIBA
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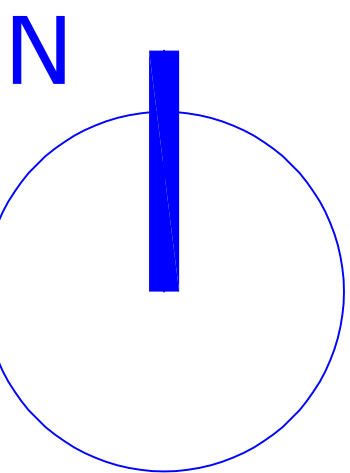
Proposed Plan



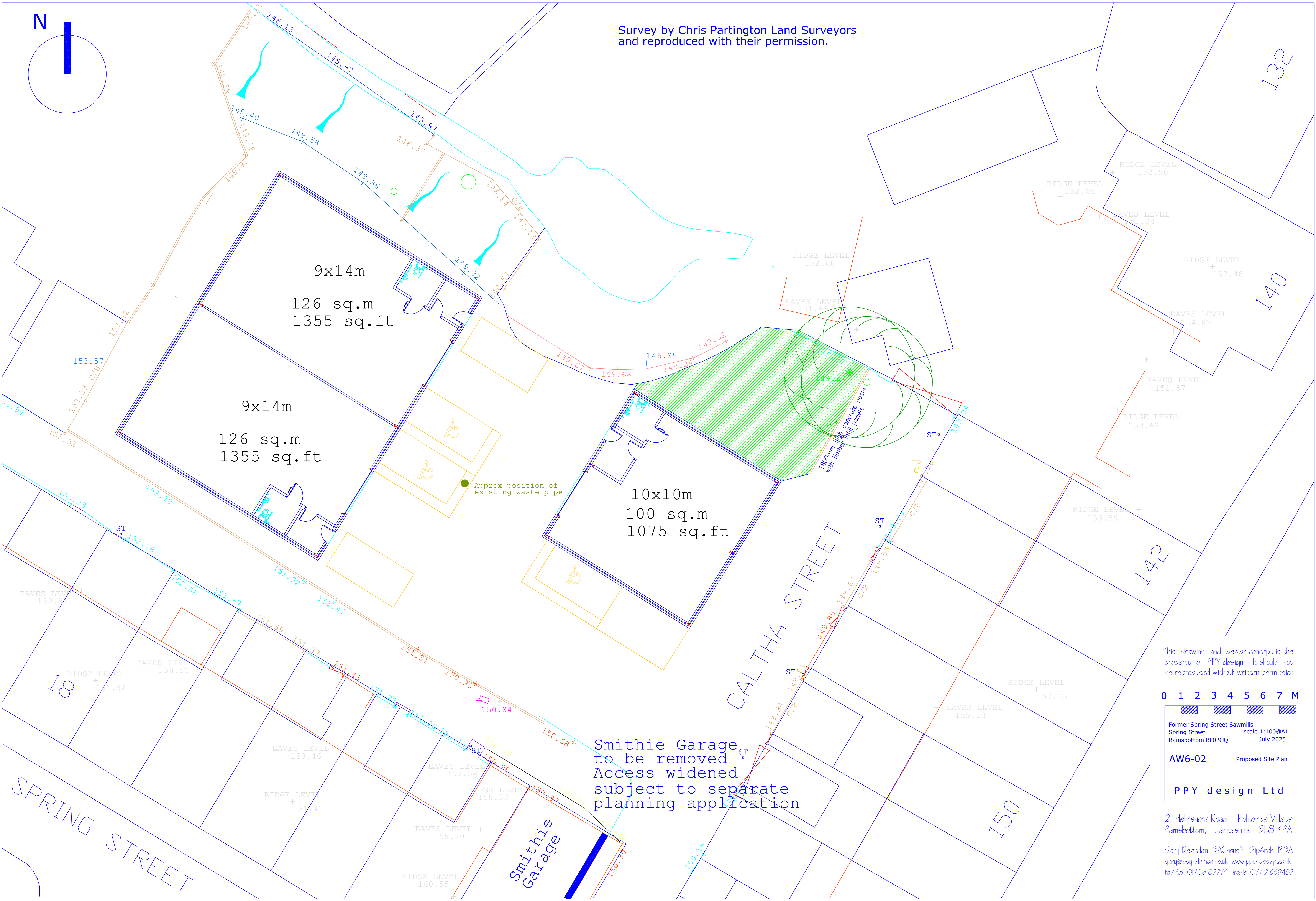
Proposed Side Elevation



Proposed Front Elevation



Survey by Chris Partington Land Surveyors
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0 1 2 3 4 5 6 7 M

Former Spring Street Sawmills	
Spring Street	scale 1:100@A1
Ramsbottom BL0 9JQ	July 2025
AW6-02 Proposed Site Plan	
PPY design Ltd	

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0123m

Former Spring Street Sawmills

Spring Street

Ramsbottom BL0 9JQ

scale 1:50@A1

July 2025

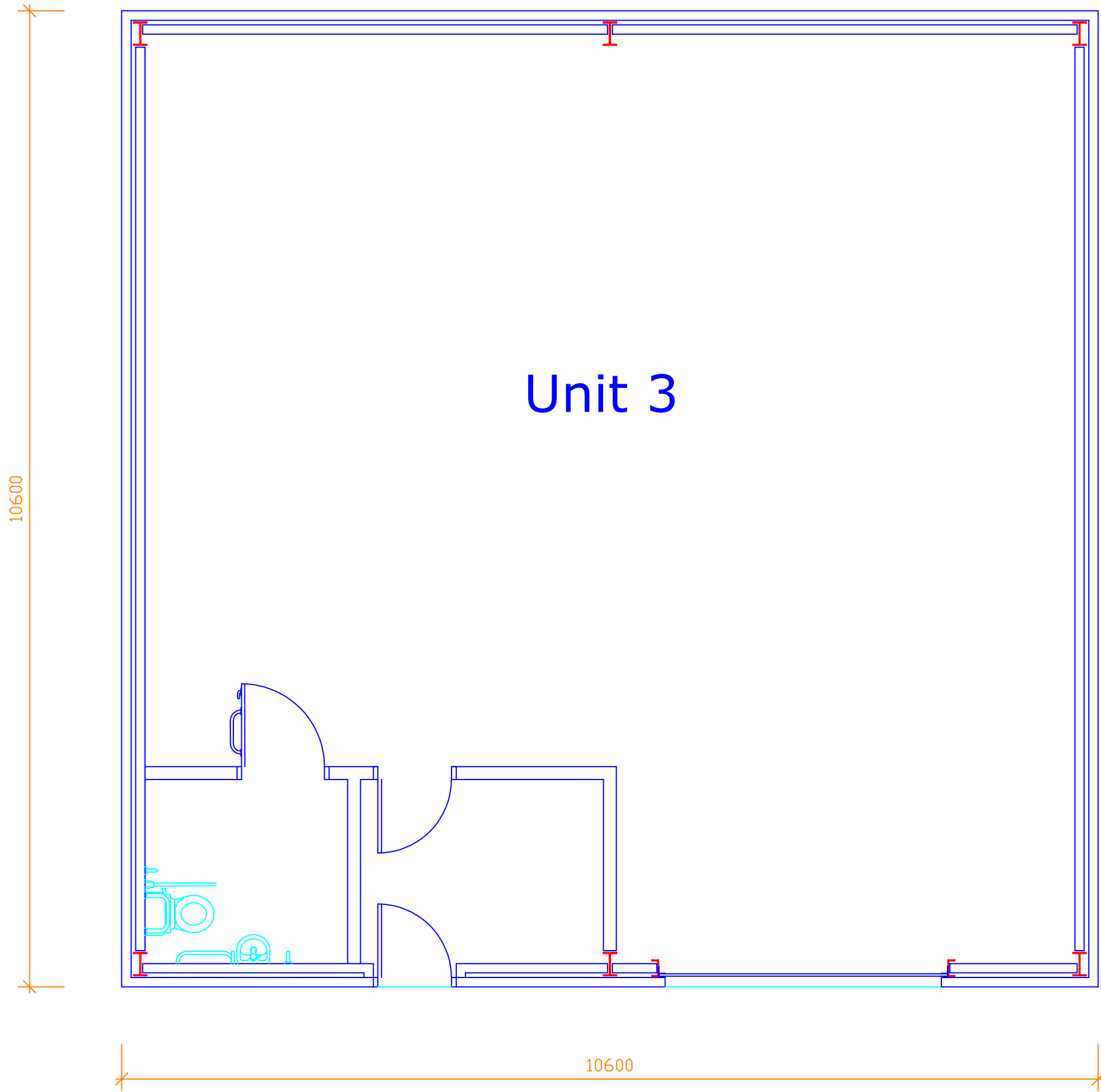
AW6-04

Proposed Unit 3

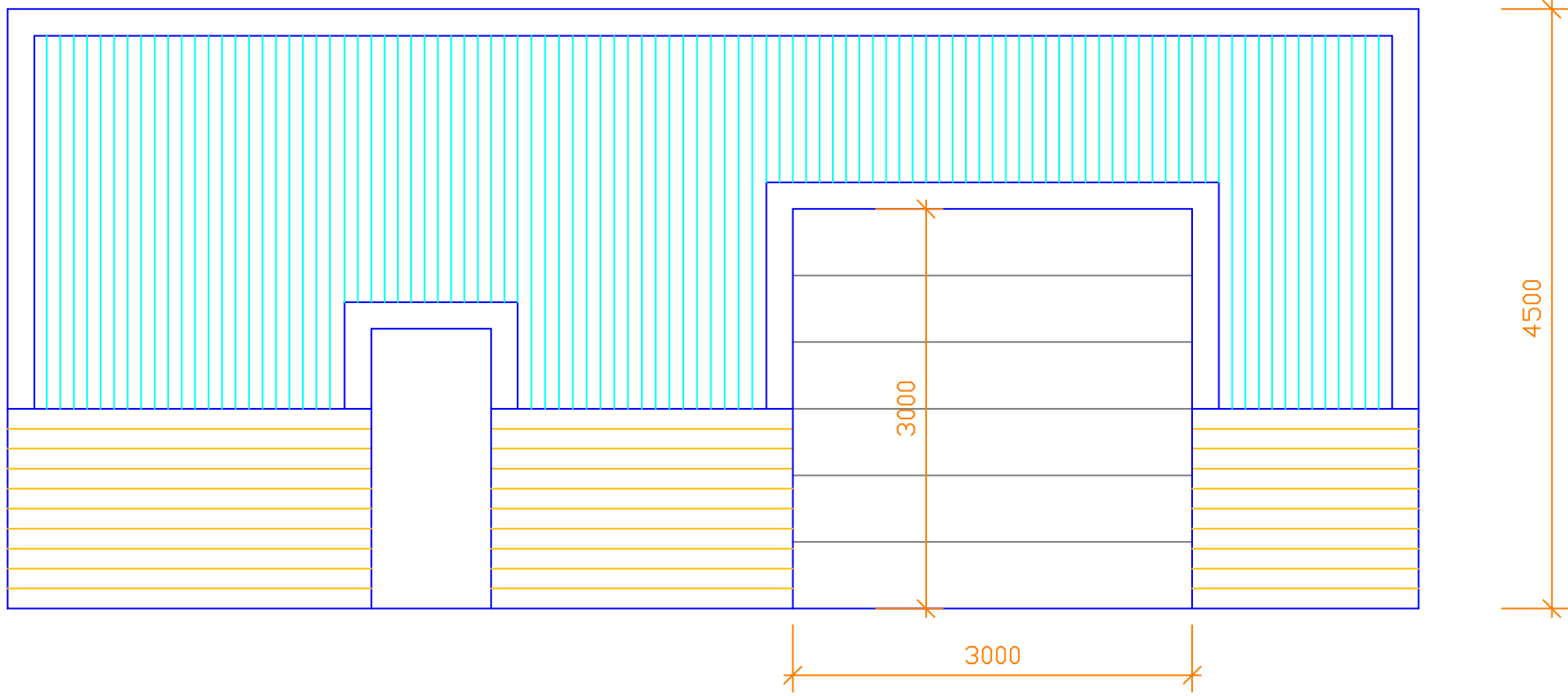
PPY design Ltd

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Ramsbottom, Lancashire BL8 4PA

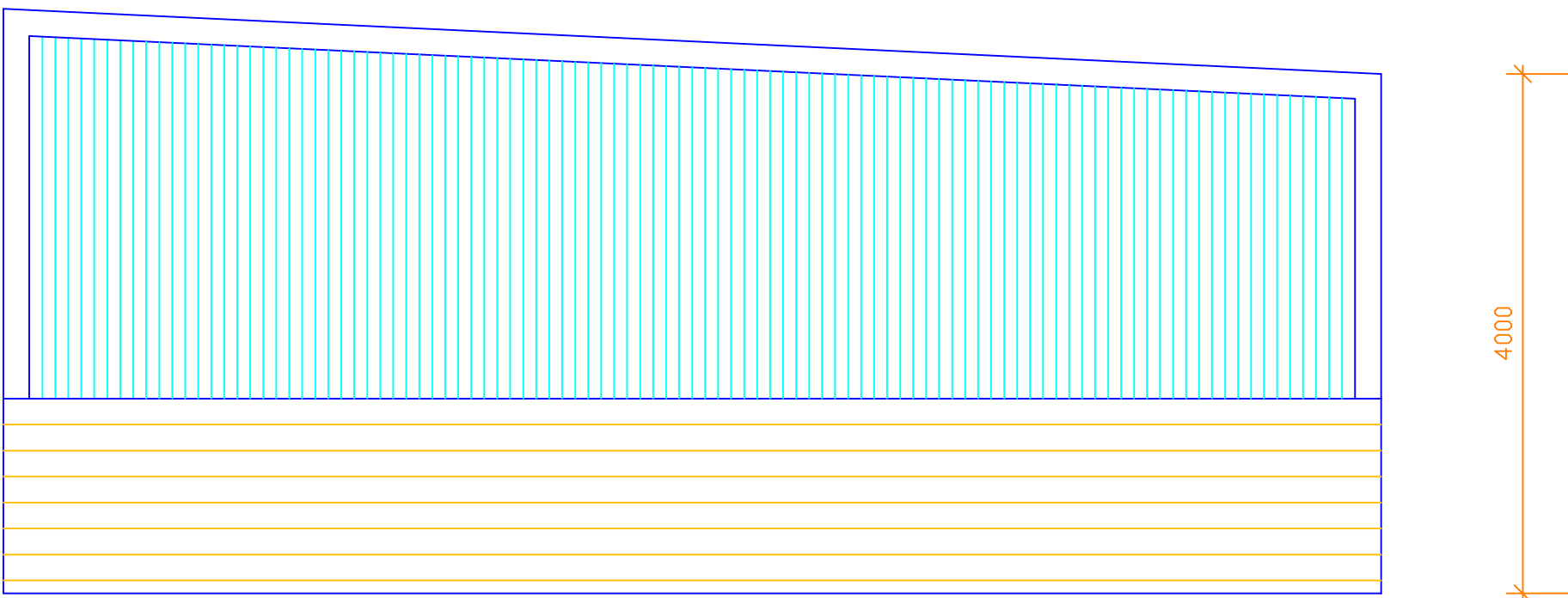
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Proposed Plan



Proposed Front Elevation



Proposed Side Elevation



APPENDIX F: HISTORICAL O.S. MAPS