

**Environmental
Geotechnical
Specialists**



PHASE 3 REMEDIATION
REPORT

GEO-TECH-NICAL
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Phase 3: Remediation Statement

Location: Sites A & B, Yew Tree Road & Burn Road
Birchcliffe, Huddersfield HD2 2EQ

For: North Park (Shelley) Ltd.

Report No. C2113/21/E/4366

Report date: July 2022

Planning Application No: Site A – 2021/61/94363/W Site B – 2021/61/91933/W

For and on behalf of **Rogers Geotechnical Services Ltd**

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1. Introduction

Further to the site specific risk assessments provided within the geo-environmental reports for Site A (report ref C2113/21/E/3266) and Site B (report ref C2113/21/E/3374), it is considered that some remediation will be required at both sites. This report provides the strategy for that remediation.

From the geo-environmental investigation, it was considered that the topsoil and made ground present at the site was contaminated with respect to the intended residential with plant uptake end use. Therefore, it was recommended that garden areas be 'remediated' by providing a capping layer of 500mm of inert material over a 100mm thick capillary break, or alternatively in areas where non-contaminated shallow soils were present, the topsoil could be stripped until natural soils were revealed. In addition, Characteristic Situation Level 2 has been assumed for Site A, thus protection from bulk ground gasses (CO₂ and CH₄) is also required.



2. Remediation Strategy

2.1 Remediation Objectives

Based on the site specific risk assessment provided in the geo-environmental report, the object of remediation at the site is as follows:

- To protect the site operatives during the construction process from the ingestion of soil or dust, dermal contact with the soil and inhalation of dust.
- To protect the end user and neighbours from the ingestion of soil or dust, dermal contact with the soil and inhalation of dust.
- To protect the garden plants from contaminated ground and to protect the end user from the ingestion of contaminated fruit and vegetables.
- To protect plastic services from being penetrated by, or degrading due to the presence of contamination in the soil or groundwater.
- To protect operatives and end users from accumulation of carbon dioxide and methane.

2.2 Development Requirements.

The site is to be developed by the construction of a number of residential properties with gardens. Therefore, it is considered that the site may be classified as being a residential with plant uptake development.

3. Scope

In order to fulfill the objectives defined above the following remedial strategy will be utilised. A pragmatic approach will be undertaken, with observational techniques being employed at each stage of the work.

3.1 Groundworks

During the ground-works phase of the development, protection to the site operatives is required. The risk to site operatives is considered under the Health and Safety at Work Act 1974, together with regulations made under the act, which includes the Control of Substances Hazardous to Health (COSHH) regulations. Therefore the risks to site personnel will be considered under the Construction Design and Management (CDM) regulations at the planning stage and be included in the contractor's Health and Safety Plan and site specific Method Statements. These documents shall include the following main elements.



- Site operatives at all levels shall be made aware of the hazards of working with contaminated soils and the hazards of working in an area where accumulations of bulk ground gasses (carbon dioxide or methane) could occur.
- Personal hygiene facilities, including washing and messing, will be provided and site operatives will be encouraged to use them.
- Where work is undertaken in dry weather the site will be dampened down to avoid dust. In addition, dust masks will be provided to all site operatives for use in dry weather.
- Where vehicles are transferring soil to the landfill site they will be covered to prevent contamination of the surrounding area by dust.
- Any stockpiles of contaminated soil on site will be sheeted over to prevent excessive amounts of airborne dust.
- Where work is undertaken in wet weather, vehicle and wheel washing facilities will be provided to ensure that the vehicles leaving the site do not transfer contamination to surrounding areas.

On completion of the ground-works a careful site inspection of the sub-grade will take place. Should visual or olfactory evidence of contamination be revealed, then suitably qualified specialists will be consulted. Further testing and updates to the site specific ground model, risk assessment, and remediation strategy will be undertaken where necessary.

3.2 Construction

During the construction phase of the contract the following items are required to protect the end user from the potential contaminants revealed at this site.

- Beneath buildings, pavements and hard-standings clean inert granular sub-base shall be employed.
- New plastic services will be constructed in a surround of clean inert material and a risk assessment will be carried as instructed by the statutory water authority for the area. Where necessary testing as recommended in the United Kingdom Water Industry Research (UKWIR) website under Report Ref. No. 10/WM/03/21 - 'Guidance for the Selection of Water Supply Pipes to be used in Brownfield Sites' will be carried out.
- The redundant services revealed at this site will be de-commissioned and piped services sealed. Any existing services that are to be employed in the new development will be carefully inspected to ensure that they are serviceable and will not allow the ingress of contamination.
- Buried concrete placed at the site will conform to the guidance given in BRE Special Digest SD1 in accordance with a design sulphate class of DS-1.

3.3 Garden, Soft-Landscaped and Hard-Standing Areas – Both Site A and Site B

In the first instance, a site scrape will be completed to remove the topsoil at the site. This material must be stockpiled separately for appropriate disposal and redistribution. Additional testing could be completed to see whether such materials could be re-used in public open-space areas, otherwise imported materials will be required.



In view of the presence of contamination and residential end use of the site, it is considered that the garden areas will require a clean cover. The nature of this cover will need to be addressed on a plot by plot basis once the site scrape has been completed.

In areas where the site scrape and subsequent excavation has not removed all topsoil or made ground, then this clean cover will be achieved by the provision of a clean cover system including a capping layer of 500mm of inert material, which will put the contaminated ground out of the end users' dig range. At the base of this layer, a granular capillary break of 100mm of free draining granular soil shall be placed in order to prevent mobile contamination rising upward. This expedient will also provide a suitable root barrier to isolate the plants from the underlying contaminated ground. It should be noted that the above needs to either be installed by excavating 600mm to a formation level and increasing levels again with the installation of the clean cover, or alternatively by being placed at the current site/formation and bringing site levels upwards by 600mm from formation.

Where the site scrape has revealed natural soils at the site surface, it is considered that this will act as suitable remediation to remove the source of contamination, such that a capping system is not necessary. However, it may still be necessary to import soils to within garden areas to act as a suitable growing medium. Nonetheless, as the source of the contamination will have been removed, the material is not designed to act as a 'cover system', and thus would not be validated as such. The developer shall instead provide a photographic record to confirm that contamination within garden areas within specific plots has been wholly removed. Note, however, that the testing requirements within section 3.5 below will remain valid with regards to imported soil.

Such clean cover systems are not required in areas of permanent hard-standing, as it is considered that this capping shall break the path-way between source and end user.

3.4 Gas Protection Measures – Inclusive of Site A

It should be noted that gas protection measures are required for properties in Site A. However, current gas levels at Site B suggest gas protection measures are not required, although it may be prudent to install such measures in any event, but this is not mandatory.

In order to assess the protection measures required BS8485: 2015: Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings has been employed. In accordance with Table 3, Building types, of the code, the development may be considered to conform to Type A. Therefore, on the basis of Table 4 Gas protection score by CS and type of building, the minimum gas protection score (points) is 3.5. The gas protection system should consist of at least two different elements. The elements work independently and collaboratively, and a single element should not be used because there would be no redundancy to allow for defects in the component.



In order to achieve this score the following shall be undertaken:

| Table 1: Combination of Protection Elements (BS8485: 2015) for CS2 | | |
|---|---|------------|
| Reference | Protection Element | Score |
| Table 5 | Precast suspended segmental sub-floor (i.e. beam and block). | 0 |
| Table 6 ¹ | Passive sub-floor dispersal layer (Note 1): | 1.5 |
| Table 7 | Gas resistant membrane complying with the requirements given in Table 7 (Note 2) | 2 |
| Total Score | | 3.5 |

Note 1:

Dispersal layers include:

- Clear void.

Note 2:

The gas resistant membrane shall meet the following criteria (from Table 7, BS 8485: 2015):

- Sufficiently impervious (methane gas transmission rate <40.0ml/day/m²/atm (average) BS ISO 15105-1 manometric method).
- Sufficiently durable and strong to remain serviceable for the anticipated life of the building, to withstand in-service stresses and installation process.
- Capable, after installation, of providing a complete barrier to the entry of the relevant gas.
- Verified in accordance with CIRIA C735: 2014: *Good practice on the testing and verification of protection systems of buildings against hazardous ground gasses.*
- Chemically resistant to degradation by other contamination that might be present.

It should be appreciated that if the membrane installed does not meet all the criteria above, then the score for the membrane is considered to be zero.

In addition to the above, the following points shall be considered.

- Technical drawings of the incorporation of the gas protection measures into the sub-structure will be provided by a suitably qualified engineer/architect and produced in accordance with the guidance given in BRE 414.
- The sequence of construction indicating when the gas protection system will be installed will be included with the construction phase plan. Where possible the installation of membranes will take place as a unique activity on site and shall not take place until sub-structure construction is complete.

¹ For details on the criteria for good and very good performance see Annex B of BS8485: 2015.



- During and following the installation of the membrane, all parties in attendance at the site shall be made aware that a gas protection system is to be employed within the construction. Such communications should include, but not be limited to, the CDM documentation for the site and site inductions.
- The installation of the membrane shall be carried out only by suitable personnel and the qualifications or experience/training will be included as part of the validation report.. The suitability of personnel will be assessed in accordance with Annex 1 of CIRIA C735.
- The installation shall be in strict accordance with manufacturer specifications and recommendations, which shall also be included as part of the remediation statement.
- The membrane system employed will not be an ensemble (i.e. a system comprising a mixture of products from different manufacturers will not be employed).
- Membranes shall be supplied to site on a single wound roll, creased product will not be accepted or employed.
- Whilst membranes are exposed, signage will be provided to indicate the access to the installation area is prohibited unless authorised. Footwear will be checked prior to accessing the membrane surface to ensure no sharp objects are apparent, such as stones caught in treads. The use of sharp objects or hot-works around the exposed membrane will be strictly prohibited unless the risk of damaging the membrane has been full assessed and mitigated.
- Non-conformance of manufacturer recommendations shall be discussed and agreed as acceptable, in writing, with a suitably qualified person from the manufacturer.

3.5 Fill Materials

Any materials to be used as fill at the site, will be subjected to the following assessment to determine its suitability.

Fill materials will be initially screened, by a suitably qualified engineer, for the following.

- It is a suitable growing medium where is to be employed as such, including compliance with BS3883 (2007)
- It is free from obvious contamination i.e. visual or olfactory evidence
- It has not come from areas where Japanese Knotweed or other invasive or injurious plants are suspected to be growing
- It is not a statutory nuisance, such as being odorous
- It is free from unsuitable material i.e. whole bricks, brick ties, timber or glass.

It should also be appreciated that any fill will be subjected to validation testing to assess its suitability. The following table has been taken from YALPAG² documentation and will be used in the first instance. Depending on the origin and nature of the material, not all fill will require the sampling frequency and testing indicated, although this will be in agreement with any regulatory bodies (such as the Local Authority).

² YALPAG *Technical Guidance for Developers, Landowners and Consultants – Verification Requirements for Cover Systems V3.3* Appendix 1a, October 2016.

**Table 2: Validation Sampling and Testing**

| Fill Type | Frequency | Minimum Determinands |
|-----------------------------------|---|---|
| Virgin Quarried Material | 1 or 2 depending on the type of stone (to confirm the inert nature of the material) | Standard metals/metalloids (As, Cd, Cr, Cr ^{VI} , Cu, Hg, Ni, Pb, Se, Zn) |
| Crushed Hardcore, Stone, Brick | Minimum 1 per 1000m ³ | Standard metals/metalloids as above plus PAH (16 USEPA) and Asbestos |
| Greenfield/ Manufactured Soils | The greater of a minimum of 3 or 1 per 250m ³ | Standard metals/metalloids as above plus PAH (16 USEPA) and Asbestos |
| Brownfield/ Screened Soils | The greater of a minimum of 6 or 1 per 100m ³ | Standard metals/metalloids as above plus PAH (16 USEPA), TPH (CWG banded) and Asbestos Any additional analysis dependant on the history of the donor site. |

It should be noted that screening values for the above regime have been included within Appendix 1 of this report. The screening values will need to be agreed with any regulatory bodies. It is anticipated, for example, that 1% SOM values will be employed for typical granular fill and 6% SOM for topsoil. However, organic matter testing will determine which screening values are appropriate for each material. Moreover, testing will comply with UKAS and MCERTS, where applicable, and undertaken by an accredited laboratory.

Where the material has been derived from a commercial company, certificates or other industry quality protocol compliance i.e. WRAP shall be obtained. However, it will be necessary to ensure that this documentation is specifically related to the material being imported, is no more than two months old and complies with the screening and frequency requirements given above.

Suitable fill materials will either be placed immediately or sufficiently quarantined to prevent cross-contamination. If it is necessary, the quarantined material will be placed on appropriate sheeting and covered to prevent it becoming mixed with contaminated soils or dust, or penetrated by mobile contaminants.

4. Verification Report

In order to demonstrate that the remediation has been sufficiently carried out and risks highlighted in the conceptual ground model are mitigated, a verification report will be produced and submitted to any statutory authorities.

The report will be produced by a suitably qualified engineer or engineers and will include the following:

4.1 Ground Works

- A record of the measures taken to cap and seal any disused services.
- The methods used for handling and final destination of any contaminated soils removed from the site.
- The qualifications or relevant experience/training of the persons carrying out the verification.



4.2 Imported Fill and Removal of Contaminated Made Ground/Topsoil

- Characterisation of the suitability of clean imported fill employed at the site including the derivation of the material, comments from a visual screen, the tests results of chemical screening, delivery tickets where appropriate and the conditions by which the clean material has been stored and handled on site.
- Photographic and logged evidence the clean material has been handled on site and placed in a sufficient thickness over areas where made ground remains. This may be either at the time of placement or after placement by means of hand excavated trialpits. Photographs shall include visual site references or reference boards to prove the location and date taken. A measurement reference shall be visible in the photographs to substantiate the thickness of material placed. Please note that it may also be necessary to undertake a topographical survey and the requirement for which should be checked with any statutory authorities.

4.3 Ground Gas Protection System

- The qualifications or relevant experience/training of the persons carrying out the installation.
- The independence of the person carrying out the verification, along with evidence of their qualifications or relevant experience/training.
- Details of the verification process including the dates of inspections and findings.
- Signed statements to confirm that protection measures were constructed as agreed. These statements shall also include confirmation that:
 - Membranes were free from tears and punctures, and installed in accordance with manufacturer guidelines.
 - Underfloor voids were clear and free from debris.
- Clear photographic evidence of the construction of membranes and/or underfloor voids, which should include key details such as air vents, membrane penetrations etc.
- Details of non-conformances and how they were rectified.
- A declaration that remedial objectives set out in the conceptual site model have been achieved.

We trust that this information is of interest, clearly Rogers Geotechnical Services Ltd would be happy to offer advice with respect to the above and assist where necessary.



Appendix 1

Screening Levels Summary Sheet

Rogers Geotechnical Services Ltd.

Atkins ATRISK Soil Screening Values (SSVs) - Residential With Plant Uptake Landuse

| Tox Data Report No. | Compound | Residential with Homegrown Produce Landuse (mg/kg) | | | | Reference |
|--|--------------------------|--|-----------------|--------------|-----------------|-----------|
| | | SOM: 1% | | SOM: 6% | | |
| <i>Metals</i> | | | | | | |
| | | SOM: 1% | | SOM: 6% | | |
| 3 | Cadmium | 22.1 | | 22.1 | | C |
| 4 | Chromium VI | 3.62 | 20.5 | 3.63 | 20.5 | B/C |
| | Copper | 4730 | | 4790 | | A+ |
| 7 | Mercury | 8.81 | | 15.80 | | A/D |
| 8 | Nickel | 136 | | 136 | | A+ |
| | Lead | 200 | | 200 | | C |
| | Zinc | 20000 | | 20300 | | A+ |
| | Vanadium | 136 | | 138 | | A+ |
| <i>Semi and Non Metals</i> | | | | | | |
| 1 | Arsenic | 37 | | 37 | | C |
| 10 | Selenium | 375 | | 375 | | A |
| | Free Cyanide | 34 | | 34 | | A |
| 9 | Phenols (total) | 267 | | 1200 | | A |
| <i>Poly Aromatic Hydrocarbons</i> | | | | | | |
| | | Free product | No free product | Free product | No free product | |
| 20 | Napthalene | 0.829 | | 12.2 | | A+ |
| | Acenaphthene | 157 | 608 | 2760 | | A+ |
| | Fluorene | 735 | | 2610 | | A+ |
| | Anthracene | 10200 | | 26200 | | A+ |
| | Fluoranthene | 983 | | 2980 | | A+ |
| | Pyrene | 668 | | 2120 | | A+ |
| | Benzo(a)anthracene | 1.71 | 4.52 | | | A |
| 2 | Chrysene | 0.44 | 585 | | | A |
| 2 | Benzo(b)fluoranthene | 1.22 | 7.72 | | | A |
| 2 | Benzo(k)fluoranthene | 0.686 | 84.4 | | | A |
| 2 | Benzo(a)pyrene | 1.51 | 4.95 | 2.05 | 4.95 | B/C |
| 2 | Dibenzo(a,h)anthracene | 0.00393 | 0.838 | | | A* |
| 2 | Indeno(1,2,3-cd)pyrene | 0.0614 | 7.31 | | | A |
| 2 | Benzo(g,h,i)perylene | 0.0187 | 96.2 | | | A |
| <i>Petroleum Hydrocarbons</i> | | | | | | |
| | Aliphatic C5-C6 | 42.7 | | 369 | | A+ |
| | Aliphatic C6-C8 | 99.3 | | 768 | 1240 | A+ |
| | Aliphatic C8-C10 | 13.9 | | 204 | | A+ |
| | Aliphatic C10-C12 | 49.9 | 81.7 | 297 | 1180 | A+ |
| | Aliphatic C12-C16 | 20.9 | 385 | 125 | 4130 | A+ |
| | Aliphatic C16-C21 | 210000 | | 210100 | | A+ |
| | Aliphatic C21-C35 | 210000 | | 210100 | | A+ |
| | Aromatic C5-C7 (Benzene) | 0.137 | | 0.871 | | A+ |
| | Aromatic C7-C8 (Toluene) | 113 | | 780 | | A+ |
| | Aromatic C8-C10 | 20.5 | | 232 | | A+ |
| | Aromatic C10-C12 | 70 | | 468 | | A+ |
| | Aromatic C12-C16 | 155 | 165 | 830 | | A+ |
| | Aromatic C16-C21 | 319 | | 1040 | | A+ |
| | Aromatic C21-C35 | 1120 | | 1710 | | A+ |
| A+ = Values update June 2017. | | | | | | |
| A* Atrisk's SSV is lower than Chemtest's detectable limit for this compound. | | | | | | |
| B = Health Criterion Values (available from toxicological reviews published in the C4SL project methodology report). | | | | | | |
| C = Category 4 Screening Levels (C4SLs). | | | | | | |
| D = SSV provided is for Methyl Mercury. | | | | | | |