



**Dewsbury Market
Whitehall Way
Dewsbury
WF13 1QX**

Outline Materials Management Plan



July 2025

J24331A
Rev 0





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0	Final		31 July 2025	

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Contents

Executive Summary

1.0	Introduction.....	1
2.0	The Site	1
3.0	Ground Conditions	3
4.0	Ground Model	4
5.0	Excavated Materials	5
6.0	Waste	6
6.0	Materials Management Strategy.....	6
7.0	Tracking System.....	7
8.0	Verification Plan	7

Appendix



1.0 Introduction

Geotechnical and Environmental Associates Limited (GEA) has been commissioned by Building Design Partnership (BDP), on behalf of Kirklees Council, to provide an outline materials management plan (MMP) to document how materials excavated on-site will be reused or managed to minimise waste and reduce off-site disposal. Consideration is being given to use of either Environment Agency U1: using waste in construction, CL:AIRE Development Industry Code of Practice (DoW CoP) and Quality protocol: aggregates from inert waste. Following appointment of a contractor for the works, if the CL:AIRE DoW CoP framework is to be utilised this report will be updated to include their details and any amendments required and submitted to an independent registered Qualified Person (QP) to complete the final declaration, along with the completed CL:AIRE Materials Management Plan Form, a blank copy of which is included in the appendix.

A site investigation has previously been carried out by Silkstone Environmental Ltd (Phase 2 Ground Investigation Report 21157/P2Mkt/2 dated March 2022). This report was reviewed and relevant information included within the subsequent GEA site investigation report (ref J24331 dated April 2025). This MMP has been based on the information within those reports.

1.1 Proposed Development

The proposed development is understood to comprise the construction of a single-storey 16 m² market stores building with areas for additional domestic wheelie bins and the larger four-wheel eurobins.

In addition, the existing area of the outside market will be redesigned to comprise paved piazza areas and soft landscaping comprising a central lawn area, with boundary trees, shrubs and water features. An electric substation and plant room, and bin store are also proposed along the boundary of the site.

A significant play area also forms part of the proposal, with hard landscaping beneath along the northern area of the market site. The piazza area will be used to house temporary markets with removable stalls.

2.0 The Site

2.1 Site Description

The site is located in Dewsbury town centre and is bounded to the north and east by Whitehall Way, Clackenedge Lane and Corporation Street to the south and southeast, and by Foundry Street to the west. In addition, a small parcel of land is situated east of Whitehall Way and is bounded by the A638 to the northeast. The site is irregular in shape, covers an area of 1.0 Ha and its centre may also be represented by National Grid Reference SE 246 219. The site encompasses two parcels of land. A small northern section of a car park and a small secure waste area for the market traders, and separated from the main area of the site by Whitehall Way, a larger outdoors market area is to the south and west.

2.1.1 Northern Parcel

The northern parcel comprises an enclosed waste area for industrial metal wheelie bins, two mechanical waste compactors and open and closed skips. At the time of the walkover, the compound was enclosed by a sandstone wall with a double metal palisade security gate. The base of the compound comprised reinforced concrete panels with a wide surface water gully along the entire gate width. The area of the waste storage was to be extended into the adjacent public car park taking approximately three car parking spaces and the exit.

The sandstone retaining wall supporting the A638 Dewsbury Ring Road makes up the northern boundary of the site and beyond the eastern boundary the stub of Wood Lane, with two-storey sandstone residential properties and the Station Hotel are present. The southern boundary comprises the footpath for Whitehall Way, with the western boundary being open.

2.1.2 Southern and Western Parcel

The larger market area comprises level paved hardstanding with many timber booth and open-table market stalls, and is bisected by the pedestrianised block-paved Cloth Hall Street. The large covered market area in the east is beyond the scope of this investigation. Two single storey sandstone-clad short rows of shops/market stalls are present in the western area of the site, with public toilets centrally located. This part of the site is completely bounded by the footpaths of Whitehall Way, Foundry Street, Corporation Street and Crackenedge Lane, with occasional bollards and low sandstone walls along their boundaries.



2.2 Site History

The site history has been researched by reference to internet sources and historical Ordnance Survey (OS) maps obtained from the Envirocheck database.

The first edition Ordnance Survey map dated 1851 indicates the northern parcel of the site to have comprised open fields. The area of the current open market is shown as open ground with the southern area occupied by a complex of buildings called Stead's Buildings and included residential properties, gardens and possible stables. Buildings were situated along the southernmost area of including a saw pit in the rear of a property fronting New Bridge Street. Dewsbury Beck was noted to be flowing along the northern boundary of the current market site, meandering east along the boundary of the site.

The market site was bounded to the west and south by existing industrial units, with a large iron and brass foundry noted as 'old' situated beyond the western boundary. The Mechanical Institute building was situated beyond the northwestern boundary.

By 1890, three-quarters of the market area had been developed, with the western quarter of the site undeveloped. Cloth Hall Street was present and bisected this area servicing the industrial buildings occupying the site. The industrial uses were predominately unnamed; but a sawmill, warehouse and the Cloth Hall Reed Works were noted, with several chimneys and a crane. Dewsbury Beck had been partially culverted along the eastern boundary by this time. The northern area was in an area associated with a large warehouse. Dewsbury Great Northern railway station was located east of the site with track running beyond the northeastern boundary. The Mechanical Institute was converted in the Cloth Hall Mills.

According to the 1893 Historical Building Plans, the eastern area of the market site was occupied by residential dwellings with a coach builder, drapers, and iron warehouse. To the east of Cloth Hall Street were van repairing yards, Cloth Hall Reed Works (centrally) and Pyrah & Co. yarn spinners Hawthorn Mills (northern area). Several open and covered tanks were present (likely to have been water, effluent or dye). To the west of Cloth Hall Street, residential dwellings and the Co-Operative Temperance Hall was present in the south, with a Circus (with furnace) in the north, with the central area being noted as storage for piling tree wood. The area of the proposed compactor beyond the northern market was noted to be R Fletcher & Son grocery warehouse. Dewsbury Market had a prefabricated cast iron and glass market in 1904 according to the West Yorkshire Archaeology Advisory Service document 'Historic Buildings in West Yorkshire'.

The 1909 OS map shows that the northern buildings occupying the market area were

woollen mills. The Hippodrome Theatre was located within the previously undeveloped western quarter of the site. The buildings in the southern area of the site were noted as the market and New Bridge Street was renamed Corporation Street. The land in the general vicinity of the site is shown to have become further industrialised with mills and warehouses.

By 1922, the market had extended north to occupy the eastern third of the site and Dewsbury Beck had been further culverted. The Old Foundry beyond the western boundary is no longer shown and the mills that had occupied the site of the Mechanical Institute were named 'Mungo'. Possible workshop/residential properties were located further to the north of the Cloth Hall Reed Works with the Dewsbury Beck between. It is anticipated these buildings were situated within the northern site boundary of the market.

The 1955 OS map and 1958 Historical Building Plans indicate that the majority of the site was occupied by markets as at the time of this investigation. Within the northern area of the current car park, the Richard Harris grocery warehouse was present. Market stalls were noted to extend within the current car park area. By 1962, the land within the site boundary west of Cloth Hall Street was utilised as a car park. By 1978, Whitehall Way had been established around the northeast and north west of the site boundary, with car parking limited to the northwestern area of the site.

According to the 1988 map, the Dewsbury Ring Road had been completed, along with the resulting demolition of the grocery warehouse. The current site layout is noted on the 1990 Ordnance Survey map.

The area beyond the southern boundary of the site had been further intensively developed, with the site of the Old Foundry comprising assumed shops/workshops with glass covered arcades. Several industrial works such as dye and cleaning mills woollen mills, warehouses and sub-stations were also noted.



3.0 Ground Conditions

Previous investigations indicate that the ground conditions comprise a significant and variable thickness of made ground over Glacial Till and fluvio-glacial sand and gravel which are in turn underlain by the mudstone of the Pennine Lower Coal Measures.

3.1 Made Ground

Within the manually excavated trial pit adjacent to the A635 retaining wall, made ground comprised apparently compacted dark grey shale which was highly weathered and extended to a the maximum depth investigated of 1.20 m.

Borehole No WS1 was drilled within the compactor yard and, beneath a 0.23 m thick layer of reinforced concrete, encountered light greyish brown sub-angular gravel that extended to a depth of 0.80m. Beneath this material, a layer of potentially reworked slightly sandy, very gravelly clay was found to extend to a depth of 1.00 m.

The made ground within Borehole No WS2 extended to a depth of 3.45 m and comprised five discrete layers. The surfacing of tarmac extended to a depth of 0.10m and was underlain by light brown sandy sub-angular gravel sub-base. Beneath the sub-base yellowish brown sandy slightly cobbly sub-angular gravel of sandstone was encountered and extended to a depth of 1.15 m. This was underlain in turn by medium dense dark grey slightly clayey, sandy angular gravel with fragments of brick which extended to 1.70m. The lowest made ground unit comprised firm, silty, very gravelly clay with fragments of coal and sandstone and extended to a depth of 3.45 m; although no anthropogenic materials were encountered within the lower unit, the consistency is considered to represent reworked natural materials.

Across the area of the market, the made ground appeared to be generally consistent. A layer of concrete was encountered at all locations at depths of between 0.10 m and 0.60 m and restricted further advancing of the trial pits. Beneath the surfacing, the made ground generally comprised sandy gravel sized fragments of ash, clinker and slag to depths of between 0.10 m and 0.60 m. In one location significant cobble sized pieces of slag were encountered to a depth of 1.20 m. All other hand dug excavations encountered a shallow secondary layer of concrete between 0.25 m and 0.55 m below ground level.

It was not possible to penetrate the concrete using hand tools, and when attempted using a hydraulic breaker and metal breaker pole, the maximum penetration into the concrete achieved was 0.10 m. An additional three boreholes were drilled and the underlying

concrete and in one location sandstone was cored to investigate its thickness. The concrete and sandstone was found to extend to depths of between 0.20 m and 0.55 m. The previous Silkstone investigation found hard paving and aggregate sub base to extend to depths of between 0.09 m and 0.29 m.

Three samples were tested for particle size distribution (PSD), comprising two samples of ash and clinker from hand dug trial pits. The two samples of ash and clinker were noted to have a fines content of 10 % and 11 %.

As the ash and clinker made ground was noted to contain fines content at or above 10%, they are considered to be potentially frost susceptible

There was no evidence of any obvious olfactory or visual indications of contamination.

3.2 Glacial Till

Beneath the made ground within Borehole No WS1, brown mottled grey, soft becoming firm, medium strength, silty clay, considered to represent Glacial Till, was encountered and extended to a depth of 2.75m. This material was underlain by medium dense gravelly sand, becoming medium dense clay-bound gravel at a depth of 3.60m where it graded into sandy gravel which extended to a depth of 4.90m. Beneath this material, very stiff very dark grey silty clay was encountered and proved to the maximum depth investigated of 5.45m.

Within Borehole No WS2, a 0.55 m thick layer of grey very sandy clay-bound gravel and dark brown silty sandy gravel was present beneath the made ground, extending to a depth of 4.00 m. This material was underlain by soft dark grey very silty clay to the maximum depth investigated of 5.45 m.

The low SPT 'N' Values of 7 and 4 at 4.00 m depth and 5.00 m depth respectively are considered to have been affected by water softening due to perched water within the intervening granular lens.

Four samples of clay were submitted for Atterberg Limit analysis. The (corrected) Plasticity Indices varied between 16 % and 25 % and comprise Low to Medium Plasticity clay. A single sample of the gravel from within Borehole No WS1 at 3.80 m and was subjected to particle size distribution testing. The gravel was noted to be clay bound during drilling and had a fines content, 0.063 mm sieve, of 21%.



3.3 Pennine Lower Coal Measures

Bedrock was encountered by Silkstone Environmental Ltd at depths of between 6.50 m and 8.00 m.

4.0 Ground Model

The site is proposed to be repurposed for an outdoor piazza area with dedicated soft landscaping comprising lawn as well as planted borders. An area for children to play is proposed associated with the soft landscaping. The piazza will be partially utilised as a temporary outdoor market stall area. Other than the soft landscaping, all other areas of the site (including the play area), will comprise hardstanding, anticipated to comprise decorative paving with soft play surfaces for the children's area. Small shallow water features will be present associated with the soft landscaping and are anticipated to be integrally supplied and managed, and not in continuity with local groundwater. Structures are limited to small single-storey utility building such as a plant room for the water features and an electrical substation.

The market area has had a significant industrial history prior to 1938; with the majority of the site comprising mills, theatres, timber yards and other smaller manufacturing yards. Significant basement features are anticipated to remain intact/backfilled, with substructure walls and floor slabs present. The former Cloth Hall Street road formation was encountered by Silkstone Environmental Ltd to be intact. Infill within former basements were noted to comprise ash, clinker and slag which is likely to be derived from the many nearby foundries.

Underlying the remnant structures and made ground is cohesive alluvium associated with the fluvial route of the now culverted Dewsbury Beck, as well as cohesive glacial till. The strength of the alluvium was noted to be predominantly very soft to soft and occasionally firm with the glacial clay, where encountered noted as firm to stiff (locally softened at interfaces and where higher proportions of granular strata was noted). Water bearing lenses of granular stratum were noted within both the alluvium and glacial till deposits. Bedrock was encountered between 6.5m and 8m below ground level, comprising mudstone with a thin coal lens.

The proposed works will predominantly be associated with reprofiling the hardstanding surface with provision for landscaping, which will predominantly be associated with shallow ground groundworks. The proposed structures are small and lightly loaded.

Groundwater flow is anticipated to be limited to granular made ground near surface, and is likely to be ponded or retained within remnant structures. Water movement within the superficial strata is anticipated to be predominantly within the granular lenses encountered; however these are not considered to be laterally extensive and are likely to have a significant fines content to retard groundwater flow. The site is situated within a



flood plain and hence there will be periods of static high level ground, which have been present throughout the period of the sites previous developments.

A cut and fill proposal has been completed by BDP, drawing no. DMTP-BDP-ZZ-ZZ-DR-C-200001 P3001350, revision P01 dated 9 December 2024.

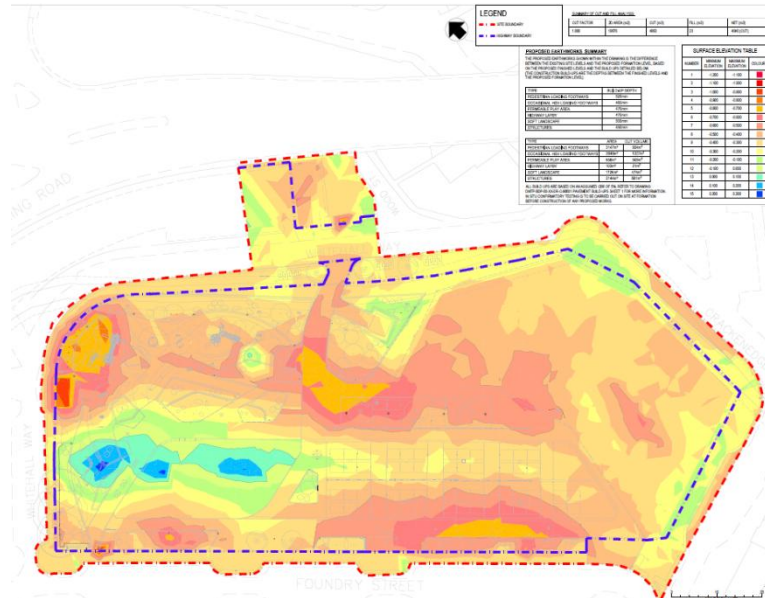


Figure 8: Cut and fill plan key:
Blue = raise 0.1m to 0.3m
Green/yellow = little change in ground levels (0.1m to -0.2m)
Red/orange = cut 0.2m to 1.1m

The anticipated cut and fill balance will be a **net cut** of 4040m³.

5.0 Excavated Materials

The proposed cut and fill exercise will involve excavation to a depth of up to 1.10 m. The materials anticipated to be encountered include concrete and brick from existing surfacing and structures; made ground comprising sub-base sand; made ground containing ash, clinker, and slag; and reworked natural clay. In addition, Glacial Till may be present, although, due to the relatively shallow depth of excavation, these materials are expected to be encountered in limited volumes.

Concrete, Sandstone and Brick

Concrete, sandstone and brick encountered on site may be crushed to form an aggregate for reuse on the site. This would be covered under WRAP Quality Protocol for the Production of Aggregates from Inert Waste. This protocol sets out strict quality control and testing procedures to ensure the recovered aggregates meet end-of-waste criteria and are safe for use in construction. The material must be processed under a Factory Production Control (FPC) system, comply with relevant British Standards (BS EN 12620 for unbound aggregates and MCHW Series 800 clause 803), and demonstrate consistent quality. Once certified, the material ceases to be waste and can be used in place of virgin aggregate. However where recovered subsurface hardstanding is processed, this requires checking for contamination prior to incorporating within the aggregate mix.

An assessment for the presence of asbestos should be undertaken prior to crushing and reuse.

Sub-base

Bedding sand and gravel sub-base were recorded beneath hardstanding present on site and are considered suitable for reuse. This could be covered under the WRAP production of Aggregates from inert waste where they meet the specification as set out by the structural engineer for reuse in paved areas, or Environment Agency U1: using waste in construction. This material could also be utilised under the DoW CoP, however for the anticipated volume of material, the use of the framework may be excessive.

Made Ground – containing ash, clinker and slag

This material was found to contain elevated concentrations of metals and PAH compounds which exceeded human health and phytotoxic threshold concentrations. However, as they are not significantly mobile or available, these materials may be retained on site without treatment, although a suitable clean cover system will be required if present in areas of soft landscaping.



These materials may be utilised as a granular bulk fill / made ground across the site and are considered suitable for reuse under the DoW COP framework, however as the site is to undergo a net cut of 4040 m³ the reuse of material under the framework may be onerous when other more suitable material is available and could be used under a U1 exemption or WRAP protocols.

Made Ground – reworked natural clay

Cohesive made ground was described as being reworked natural clay and was generally found to be uncontaminated, although a slightly elevated concentration of zinc above the phytotoxicity threshold was encountered following excavation. This stratum is anticipated to be suitable for reuse across the site either under an Environment Agency U1 exemption or the DoW CoP framework. The use of the DoW CoP framework may be overly onerous given the small volumes of material to be re used and the Environment Agency U1 exemption is considered to be more appropriate for this material, should re-use be proposed.

This stratum is sensitive to moisture and hence moisture content control and will be required to ensure this material is not degraded. This material will be suitable for reuse assuming the properties of the clay are controlled. This is likely to require further analysis once areas of cut and fill are confirmed.

Glacial Till

This stratum was noted to be uncontaminated and suitable for use across the site as fill material. This stratum is sensitive to moisture and hence moisture content control and will be required to ensure this material is not degraded.. The reuse of clean natural soil that has been excavated on site as part of construction can be used within construction without restriction and falls outside the waste framework directive. However it is considered unlikely that significant volumes of this material will be excavated as part of the construction.

6.0 Waste

Any spoil arising from excavations or landscaping works, which is not to be re-used in accordance with the CL:AIRE guidance, will need to be disposed of to a licensed tip. Waste going to landfill is subject to landfill tax at either the current standard rate of £126.15 per tonne (about £231.00 per m³) or at the lower rate of £4.05 per tonne (roughly £7.50 per m³). However, the classifications for tax purposes and disposal purposes differ and currently all made ground and topsoil is taxable at the 'standard' rate and only naturally

occurring soil and stones, which are accurately described as such in terms of the 2011 Order, would qualify for the 'lower rate' of landfill tax.

Based on the technical guidance provided by the EA it is considered likely that the soils encountered during this ground investigation, as represented by the chemical analyses carried out, would be generally classified as follows.

Soil Type	Waste Classification (Waste Code)	WAC Testing Required Prior to Landfill Disposal?	Current applicable rate of Landfill Tax
Ash & Clinker Made ground	hazardous (17 05 03)	Yes	£126.15/tonne (Standard rate)
Made ground (not containing ash & clinker)	Inert non-hazardous (17 05 04)	Should not be required but confirm with receiving landfill	£4.05 / tonne (Reduced rate for uncontaminated naturally occurring rocks and soils)
Alluvium and Glacial Till	Inert non-hazardous (17 05 04)	Should not be required but confirm with receiving landfill	£4.05 / tonne (Reduced rate for uncontaminated naturally occurring rocks and soils)

This advice is only preliminary and will need to be reviewed once waste streams have been identified

7.0 Materials Management Strategy

Materials will be excavated, stockpiled, and segregated on-site by type and quality. Stockpiles will be labelled and placed on impermeable surfaces with bunding.

Materials will be screened and tested to assess suitability for reuse which will include chemical testing and where appropriate geotechnical testing. Soils to be used in landscaped areas will be assessed against the parameters set out in the remediation method statement for the site and any non-conforming material will either be disposed of off-site or placed below the proposed capping layer.

The current cut and fill drawing only indicates a fill of 23 m³, however if the reuse of hard paving and sub base can be utilised as a suitable aggregate for use in hard paved areas it is considered that this could be increased significantly in the order of 400 m³ assuming a 0.20 m build-up of recycled aggregates over a paved area of 2000 m².



8.0 Tracking System

A tracking system to record the movement and placement of materials on site is a key requirement of a compliant Materials Management Plan (MMP). While the ultimate responsibility for maintaining the tracking system lies with the contractor, it must as a minimum, record the source and destination of materials, along with the quantity and type of material moved. A basic tracking proforma is provided in the appendix.

Comprehensive materials tracking logs will be maintained throughout the works, documenting:

-  The source location of materials on-site
-  The volume and type of material moved
-  Relevant testing results confirming suitability for reuse
-  The final placement location of the materials

These records will ensure full traceability of all excavated and reused materials.

9.0 Verification Plan

The verification plan will depend on which protocol or framework is utilised for the site. It is considered that the most appropriate for this site will be the WRAP Quality protocol: aggregates from inert waste for crushed material and aggregates and the Environment agency U1 exemption for 'clean' soils. An example pro forma for a statement for conformity with the WRAP protocol is included in the appendix.

Following the placement of materials, representative post-placement samples will be collected where necessary to confirm that the materials meet the agreed end-use criteria, as defined by the site-specific risk assessment and relevant guidance values. This process will verify that materials have been reused appropriately and do not pose an unacceptable risk to human health or the environment.

Upon completion of the works, a formal Verification Report will be submitted. This report will include:

-  The quantities and types of materials reused
-  Compliance with Material Management Plan (MMP) procedures and the requirements of the Definition of Waste: Code of Practice (DoWCoP), WRAP Protocol and / or U1 exemption
-  Outcomes of any verification testing carried out
-  Details of any deviations from the original plan, along with justifications

The Verification Report will be retained for regulatory and audit purposes and made available to relevant stakeholders, including the Local Planning Authority and, where applicable, the Environment Agency.



Appendix

- a. Cut And Fill Plan - DMTP-BDP-ZZ-ZZ-DR-C-120002
- b. CL:AIRE - Materials Management Plan (MMP) Form – (October 2014)
- c. Example Materials Tracking Proforma
- c. Example WRAP Quality Protocol – Statement of Conformity Proforma

Materials Management Plan (MMP) Form - October 2014

This form should be completed once the lines of evidence have been marshalled in relation to suitability for use, certainty of use and quantity required.

The answers to the questions posed within this form, together with the supporting information will constitute the MMP and must be provided to the Qualified Person.

A Qualified Person may comment on draft versions of this MMP, but will not complete the Declaration until all the relevant documents, demonstrating lines of evidence have been provided for each site.

The person / organisation who will pay the Declaration fee should confirm that they have read and understand the Terms and Conditions relating to the payment of the Declaration fee to CL:AIRE. These can be found on the CL:AIRE website.

The person / organisation agreeing to pay the Declaration Fee - Name, organisation and contact details inc. email address -	
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☐ **I confirm I have read and understood the Terms & Conditions.**

Each question must be answered. If the question is not applicable please state this and provide a brief explanation.

1. Specify the scenario to which this MMP relates, as described in the Definition of Waste: Development Industry Code of Practice (DoW CoP) (1, 2, 3 or 4):

- ☐ 1. Reuse on the Site of Origin
- ☐ 2. Direct Transfer of clean naturally occurring soil / mineral materials
- ☐ 3. Cluster Project
- ☐ 4. Combination of any of the above

In the case of a combination of reuse scenarios, please describe it below (e.g. (i) Reuse on Site of Origin and Direct Transfer of clean naturally occurring unpolluted soils, (ii) Reuse on the Site of Origin with Direct Transfer of clean naturally occurring soil to x number of development sites etc:

(NB: A Declaration is required for reuse on the Site of Origin and for any 2 site arrangement i.e. there is no facility for a combination Declaration)

2. Organisation and name of person preparing this MMP	(Full address and contact details)
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Document Control

Date issued	
Revision date	
Summary of revision 1	
Summary of revision 2	

Insert additional lines to the table above for any subsequent revisions.

Note - revisions to the MMP do not trigger an additional Declaration by a Qualified Person, unless an additional site is added to the project.

Revisions to the MMP must be recorded and summarised in the Document Control box above.

Site Details

3. Site / Project name(s)	
Reuse / receiving site name :	
Donor site name (if Direct Transfer)	

Landowners

4a. Name of Landowner(s) (full address and contact details) – where excavated materials are to be reused	
4b. Name of Landowner(s) (full address and contact details) – where excavated materials are arising from	

Summary and objectives

5a. Provide a brief description of the planned project and how excavated materials are to be reused.	
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General Plans and Schematics

6. <u>Attach</u> a location plan for the site(s) and a plan of the site(s) which identifies where different materials are to be excavated from, stockpile locations (if applicable), where materials are to be treated (if applicable) and where materials are to be reused.	Plan Document Reference(s):
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7. <u>Attach</u> a schematic of proposed materials movement. Where there is only one source area and one placement area briefly describe it. For all other projects a schematic is required.	Description & Schematic Document Reference:
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Parties Involved and Consultation – if more than one party please provide additional details for them and identify the location that they will be working e.g. where a site is zoned

8a. Main earthworks contractor(s) (full address and contact details) – Where excavated materials are to be reused	
8b. Main earthworks contractor(s) (full address and contact details) - Where excavated materials are arising from	

9. Treatment contractor(s) (full address and contact details) – for treatment on site of origin, or at a Hub site within a fixed STF / Cluster Project	
10. Where wastes and materials are to be transported between sites, provide details of the transport contractor(s) (full address, contact details and waste carriers registration details (if applicable))	
11. Provide Local Authority contact details (full address and named contacts) where excavated materials are to be reused	
12a. For the site where materials are to be reused and for Hub Site locations provide Environment Agency contact details (full address and named contacts):	
For all Cluster Projects:	EA references:
12b. Attach any relevant documentation	

from the EA relating to the excavation and reuse of the materials to demonstrate no objection to the proposals (see 3.37 of DoW CoP) If the EA has not been consulted please explain why (see paragraph 3.39 of the DoW CoP).	
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Lines of Evidence

There is no one single factor that can be used to decide that a substance or object is waste, or when it is, at what point it ceases to be waste; as complete a picture as possible has to be created.

The following sections require completion to ensure the correct decision is made.

If a requested item is not relevant it is important to clearly state why this is so (e.g. no planning permission required because permitted development status exists).

Suitable for use criteria

13. Please describe or provide copies of the required specification(s) for the materials to be reused on each site.	Document Reference(s):
<i>Where contamination is suspected or known to be present</i> 14a. Please provide copies of or relevant extracts from the risk assessment(s) that has been used to determine the specification for use on the site. This must relate to the place where materials are to be used. This must be in terms of (i) human health (ii) controlled waters and (iii) any other relevant receptors. If a risk assessment is not relevant for a particular receptor given the site setting please explain why below:	Document Reference(s):
14b. Please attach any relevant documentation from the LA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)	LA Document references:
14c. Please attach any relevant	EA Document references:

documentation from the EA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 and Table 2 of the CoP)	
14d. Please attach any relevant documentation from any other regulators (if relevant) relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)	Document Reference(s):

<i>Where contamination is not suspected</i>	Document Reference(s)
15a. Please attach copies or relevant extracts from the Desk Top Study that demonstrates that there is no suspicion of contamination.	
15b. Please attach copies of or relevant extracts from the site investigation/testing reports that adequately characterise the clean materials to be used (if appropriate).	Document Reference(s)
15c. Please attach copies of any other relevant information (if available) confirming that land contamination is not an issue.	Document Reference(s)

NB: It is your responsibility to assess the nature of the material to be used and that it fits within the limitations of the scenario under which it is to be used

Certainty of use

Various lines of evidence are required to demonstrate that the materials are certain to be used. This includes:

- The production of this MMP
- An appropriate planning permission (or conditions that link with the reuse of the said materials)
- An agreed Remediation Strategy(ies)
- An agreed Design Statement(s)
- Details of the contractual arrangements

Please identify in the following sections what lines of evidence relate to the site(s) **where the materials are to be used**.

16a. Planning Permission(s) relating to the site where materials are to be reused Please provide a copy of the relevant planning permission	Document Reference:
16b. Explain how the reuse of the excavated materials fits within the planning	

permission(s) for each site.	
16c. If planning permission is not required for any one site please explain why below e.g. permitted development, clean up of a chemical spill, surrender of an Environmental Permit, re-contouring within the existing permission.	

<i>Where contamination is suspected or is known to be present</i> 17. Please provide a copy of any Remediation Strategy(ies) that have been agreed with relevant regulators.	Document Reference(s):
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<i>Where contamination is not suspected</i> 18. Please provide a copy of any Design Statement(s) that have been agreed (e.g. with the planning authority or in the case of permitted developments the client).	Document Reference(s):
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Quantity of Use

19. Please provide a breakdown of the excavated materials for each site and how much will be placed at each site or sub area of each site. Where this is not specific to a single readily identifiable source refer to an annotated plan, schematic or attach a tabulated summary.	Document Reference(s):
20a. How has consolidation/compaction being considered in the above mass balance calculations?	
20b. How has loss due to treatment being considered in the above mass balance calculations (if applicable)?	
20c. How has the addition of treatment materials being considered in the above mass balance calculations (if applicable)? Note - An exact figure is not required but	

one that is reasonable in the circumstances and can be justified if challenged.	
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Contingency arrangements

Explain what is to happen in the following situations and **identify the appropriate clauses** in the contract(s) (Such clauses must be provided to the Qualified Person, preferably as a summary document): or

21a. What is to happen to, and who is to pay for out of specification materials?	Reference:
21b. What is to happen to, and who is to pay for any excess materials?	Reference:
21c. What happens if the project programme slips in relation to excavated materials or materials under -going treatment?	Reference:
21d. Other identified risk scenarios for the project (relating to excavated materials)?	Reference:

The Tracking System

Where contamination is suspected or known to be present, state the procedures put in place to:

22a. For all sites please describe the tracking system to be employed to monitor materials movements.	
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i> 22b. Prevent contaminants not suitable for the treatment process being accepted	
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i> 22c. Prevent cross contamination of materials not in need of treatment, wastes awaiting treatment and treated materials	
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i> 22d. Demonstrate that materials that do not require treatment and successfully treated materials reach their specific destination	
<i>Where contamination is suspected or known to be present, state the procedures put in place to:</i>	

22e. Ensure that waste for off-site disposal or treatment is properly characterised and goes to the correct facility	
23. Please attach a copy of the tracking forms / control sheets that are to be used to monitor materials movements. To include transfer of loads on site into stockpiles prior to treatment (if applicable), stockpiled after treatment (if applicable), stockpiled awaiting use (as appropriate) and final placement.	Document reference(s)
<i>For Hub Sites within Cluster Projects & where materials need treatment before reuse</i> 24. Please attach a copy of the Environmental Permit covering the treatment process. Alternatively if the treatment is covered by a	Permit reference / EA letter reference:

Mobile Plant Permit and associated Deployment Form, attach a copy of the EA agreement to the Deployment Form.	
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Records

25. Where, and in what form, are records to be kept? Note – records e.g. transfer notes, delivery tickets, Desk Top Study, Site Investigation, Risk Assessment(s), Verification Report(s) need to be kept for at least 2 years after the completion of the works and production of the Verification Report	
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Verification Plan

26. Provide or explain the Verification Plan which sets out how you will record the placement of materials and prove that excavated materials have been reused in the correct location and in the correct	Document Reference
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quantities within the development works (see 3.4 of the DoW CoP).	
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DAILY TRACKING RECORD

Site Client Contractor		Date	
		Completed by	Sheet No
Material Excavated			
Location (grid reference)			
Volume (no. of loads or m3)			
Description of material			
Material Placed			
Location (grid reference)			
Volume (no. of loads or m3)			
Out of Specification Material			
Storage Location			
Volume (no. of loads or m3)			
Description of material			
Daily Notes			

WRAP Quality Protocol: Aggregates from Inert Waste

Pro Forma – Statement of Conformity

1. Producer Details

Field	Information
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Company Name: _____

Site Address: _____

Contact Name: _____

Position: _____

Phone Number: _____

Email: _____

2. Description of Material

Field	Information
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Material Type: _____

Aggregate Description: _____

Source Waste Type (EWC Code): _____

Final Product Specification (e.g. BS EN 13242): _____

Intended End Use (e.g. sub-base, pipe bedding): _____

3. Processing and Quality Control

Field	Information
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Processing Methods (tick all that apply): ☐ Crushing ☐ Screening ☐ Magnetic Separation ☐ Manual Picking
☐ Washing ☐ Other: _____

Quality Management System in Place? ☐ Yes ☐ No

FPC Standard Used (e.g. EN 13242): _____

Field	Information
Testing Conducted:	_____
Frequency of Testing:	_____
Results Summary:	_____ (Attach lab reports or reference internal file location)

4. Compliance with Quality Protocol

Tick to confirm compliance with the following statements:

Statement	Tick
The material has been produced according to the WRAP/EA Quality Protocol.	☐
It meets the required technical standards for the intended use.	☐
It is no longer classified as waste.	☐
The product is free from hazardous or non-conforming contaminants.	☐

5. Declaration

I declare that the recycled aggregate material described above complies with the **WRAP Quality Protocol: Aggregates from Inert Waste** and is considered a non-waste product suitable for the stated use.

Signed: _____
Name (Printed): _____
Position: _____
Date: ____ / ____ / ____

6. Supporting Documentation (Attach or Reference)

- ☐ Factory Production Control (FPC) Records
- ☐ Sampling & Testing Results
- ☐ Waste Acceptance Criteria / Procedures
- ☐ Staff Training Records
- ☐ Equipment Maintenance Logs
- ☐ Other: _____



Geotechnical &
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