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Remediation Strategy

Residential Development

Pilsworth Road, Heywood

May 2024



Residential Redevelopment

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Non-technical Summary

Task No.	Remediation Task
Pre-Commencement	
N/A	None required.
Demolition / Enabling Works Phase	
EW1 – Discovery Strategy	PC to adopt and communicate the Discovery Strategy to all relevant site workers. Notify Soiltechnics upon encountering any unexpected contamination.
Construction Works Phase	
CW1 – Strip and remove shallow soils	Complete removal of topsoil and Made ground soils from soft landscaping areas down to natural, uncontaminated subsoils. Where deep Made Ground is encountered, excavations may stop at 600mm below FFL. The contractor must provide a photographic record of all works, along with copies of the waste disposal records.
CW2 – Provision of growing medium	Site-won clean and uncontaminated subsoils may be used to make-up the site levels, topped with 150mm to 300mm of imported chemically and physically suitable topsoils. The consultant must visit the site to inspect and sample the imported and site-won soils, across a depth of 600mm.
All Work Phases	
AW1 – Material management	Maintain records for all soils and liquids imported, exported, and disposed of.
AW2 – Material verification	Ensure chemical verification is carried out on all imported soil and fill materials.
AW3 – 3 rd party verification	The Consultant must undertake site inspections and conduct sampling and investigations necessary to verify all remedial tasks outlined above. A Verification Report must be produced upon completion.

1 Introduction

1.1 Scheme Outline

- 1.1.1 We understand the scheme comprises the construction of a two-storey specialist supported living complex, containing 8 No. 1-bedroom flats with a central stair core, ancillary worker facilities and soft landscaping.
- 1.1.2 It is understood that the development is controlled under the Rochdale Borough Council. The development is listed under planning application 23/01381/FUL.
- 1.1.3 An aerial image showing the approximate site boundary is presented below, with the application boundary shown in blue (ownership boundary in red). A series of site plans are provided within Appendix A.



Figure 1-A: Aerial site plan

- 1.1.4 The report is based on the project proposals and information outlined above; should the scheme change then it will be necessary to review the report.

1.2 Brief

- 1.2.1 This report has been prepared following instructions received from Ward Williams Associates, on behalf of our mutual Client, Cornerstone Place Limited.
- 1.2.2 The objective of the remediation strategy is to address the remedial recommendations outlined within the previous ground investigation report (GIR) undertaken by Soiltechnics Ltd (report ref: STV6300-R02 Rev C, dated March 2024). In addition, the report aims to address the relevant planning conditions associated with the development.
- 1.2.3 The Remediation Strategy will be carried out following the principles of BS10175: 2011+A2:2017 'Investigation of potentially contaminated sites – Code of Practice' and the Environment Agency's Land Contamination Risk Management guidance.

1.3 Aims and Objectives

1.3.1 The principal aim of this report is to satisfy the brief outlined above and thereby provide information to facilitate the safe development of the project. The objectives of this report are outlined below:

- i. Confirm if sufficient information is available to inform the remediation.
- ii. State the relevant pollutant linkages which require remediation.
- iii. Identify a feasible remediation option to break the pollutant linkages.
- iv. Set remediation objectives and criteria.
- v. Outline how the remediation will be implemented.
- vi. Identify any monitoring and maintenance requirements.
- vii. Establish a verification plan.
- viii. Recommend any further works.

1.4 Limitations

1.4.1 Soiltechnics disclaims any responsibility to our Client and others in respect of any matters outside the scope of this report. This report has been prepared with reasonable skill, care, and diligence in accordance with the terms of our contract, taking account of the resources devoted to it by agreement with our Client. This report is confidential to our Client and Soiltechnics accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

2 Site Conditions and Identified Contamination

2.1 Sources of information

2.1.1 Reference has been made to the following sources of information.

Author	Document Title	Date & Document Reference	Report Context
Soiltechnics	Ground Investigation Report	March 2024 STV6300-R02 Rev C	A Tier 1 & 2 contamination assessment for the site, specific to the current development proposals. Included intrusive ground investigation works to assess potential contaminative linkages.

Table 1: Summary of previous reports

2.2 Ground conditions encountered

2.2.1 The ground conditions can be summaries as follows.

Stratum	Description	Thickness	Top Depth
Topsoil (Made Ground)	Dark brown sandy gravelly clay with gravels of brick, ceramic, concrete, clinker, and glass fragments.	0.30 – 0.45m	G.L.
Made Ground (WS04 only)	Clayey gravel of clinker, ceramic, wood and brick with glass fragments.	0.30m	0.25m
Devensian Till	Firm to stiff orangish brown mottled grey slightly gravelly slightly sandy silty CLAY with localised silty SAND (WS02 & WS07)	0.68 – 2.30m	0.30 – 0.55m
Weathered Pennine Lower Coal Measures Formation	Stiff brown slightly sandy slightly clayey silty GRAVEL	-	1.70 – 2.60m

Table 2: Geological Summary

2.2.2 Perched groundwater was observed in two locations within the Devensian Till at depths of between 1.60m to 2.40m bgl.

2.3 Contamination encountered

2.3.1 Multiple PAH exceedances and have been identified within the topsoil across the whole site, and within localised deposits of Made Ground. Occasional exceedances of arsenic, beryllium and lead were also detected.

2.3.2 No other evidence was contamination was observed during the fieldworks; however, there are significant concentrations of deleterious materials (glass, concrete, brick, and metal) within the existing shallow soils. Although not a source of chemical contamination, their presence within near surface soils in gardens would be undesirable.

2.3.3 No ground gas or radon protection measures are required.

3 Outline Remediation Strategy

3.1 General

3.1.1 This remediation strategy only considers the process of remedial action in terms of addressing contamination recognised to date. If during development, contamination not previously identified is found to be present, Soiltechnics must be notified in accordance with the Discovery Strategy, an addendum remedial strategy may then be required.

3.1.2 Laboratory analysis must be commissioned with testing houses that are suitably experienced and are MCERTS accredited with a quality assurance system.

3.2 Relevant Pollutant Linkages

3.2.1 The relevant pollutant linkages identified within the previous Ground Investigation Report are as follows:

Source	Pathway	Receptor
PAHs and elevated metals within near surface soils	Dermal contact, inhalation and ingestion of soils and dusts.	End users of the site

Table 3: Established relevant pollutant linkages from previous reports

3.3 Outline Remediation strategy

3.3.1 The remediation strategy has been determined in view of the previous ground investigation report findings and the proposed development scheme. It can be summarised as follows:

- i. Prepare and implement a discovery strategy for the groundworks.
- ii. Removal, and replacement of topsoils and Made Ground.

4 Unexpected Contamination

4.1 Discovery Strategy

4.1.1 With the development of any site, there is a residual risk of contamination being found that is unexpected or has not been previously encountered.

4.1.2 As a precaution, the Principal Contractor should adopt the Discovery Strategy in Appendix B for dealing with unexpected contamination. The Principal Contractor should also ensure it is distributed and communicated appropriately to all relevant ground workers.

4.1.3 A discovery event shall be triggered if any of the following observations are made.

Contaminant	Criteria - Type	Criteria - Description
Petroleum Hydrocarbons and chlorinated solvents	Visual	Liquid oil, oil saturated soils in veins or zones. Heavily stained or coated surfaces
	Headspace	Strong odours (e.g. pungent, acrid, pleasant, sweet smells)
Free product (oil)	Visual	A visible free oil phase seeping from soils or floating on top of groundwater at a measurable thickness.
Asbestos Containing Materials (ACM)	Visual	Suspected bound ACMs identified where frequency of ACMs is greater than sporadic or infrequent inclusions. Any occurrence of suspected loose ACM material (such as pipe lagging or insulation).
Other sources of contamination	Miscellaneous	Unusual smells or colours. Potentially contaminative buried artefacts, such as oil drums, machine and car parts, uncontrolled demolition material, domestic refuse, etc.
Underground Storage Tanks (UST)	Visual	USTs being encountered on site.

Table 4: Contamination Triggers

5 Topsoil Strip

5.1 Scope

- 5.1.1 Where present, the provision of hardstanding areas will sever the pathway to end-users of the site, and no action is considered necessary.
- 5.1.2 The potential for unacceptable ground contamination on site is primarily limited to the topsoil deposits and localised areas of Made Ground. On this basis, the full removal of these soils is required, down to natural uncontaminated soils.
- 5.1.3 Where deep Made Ground is encountered, excavations may stop at 600mm below FFL, as the placement of 600mm of chemically and physically suitable imported soils will sever the contaminant exposure pathway.

5.2 Alternative Strategy

- 5.2.1 Further investigation and risk assessment within specific soft landscaping areas, may allow the refinement of the existing risk assessment and potentially reduce the extent of remedial works. If such works are to be undertaken, the revised risk assessment and addendum remedial strategy must be submitted to the regulator for approval.

5.3 Verification & Contractor Records

- 5.3.1 Stripping the topsoil and Made Ground soils from the site is a non-technical remedial task, easily evidenced through the provision of appropriate records.
- 5.3.2 Providing the following information can be provided during the removal works, no independent verification of the removal works is required at this stage.
- A photographic site record, clearly showing the stripping, and removal of the topsoil and Made Ground from site, down to natural uncontaminated subsoils.
 - A copy of all Waste Transfer / Consignment Notes for soils taken off-site for disposal.

6 Topsoil Replacement

6.1 Material Sourcing

- 6.1.1 Replacement topsoils will need to be imported from off-site sources.
- 6.1.2 Topsoil should not be placed at a thickness of greater than 300mm. Imported or site-one subsoils should be used below topsoils to address any deficit in site levels.

6.2 Contractor Pre-delivery Compliance Checks

- 6.2.1 The Contractor should confirm the origin of all imported materials and request available chemical testing results from suppliers prior to delivery, to provide confidence of suitability. All associated records should be provided to Soiltechnics ahead of delivery.

6.3 Contractor Requirements Upon Delivery

- 6.3.1 The source and volume of all imported topsoil materials used in the development must be clearly documented, with records provided for inclusion in the Verification Report.
- 6.3.2 For all imported materials, the Principal Contractor should maintain records sufficient to evidence the following:
 - The supplier
 - Material source (address)
 - Material origin (e.g., virgin material, recycled, manufactured)
 - Material type (e.g., topsoil, subsoil, recycled aggregate, 6F2, etc.)
 - The overall volume of each material type imported.
 - Delivery dates.
 - An inspection of every delivery of landscaping soil to confirm the physical, visual, and olfactory suitability of the material.

6.4 Material Suitability Criteria

- 6.4.1 All imported and site-won soils and fill material should be inspected and tested to confirm they are chemically and physically suitable for use, in terms of the risks to human health.
- 6.4.2 The physical composition of materials must be free of harmful and injurious artefacts (such as sharps), over-sized materials (such as cobbles and boulders) and show no visual or olfactory evidence of contamination.
- 6.4.3 Materials should also be chemically suitable, with concentrations of contaminants falling within widely recognised and published soil guideline values (such as the C4SLs and S4ULs), with the following model being applied.
 - Residential with plant uptake, at 2.5% SOM.
- 6.4.4 No bulk ACM materials should be present. Where asbestos fibres have been detected, this should be limited to no more than 1 in 4 samples and quantified at <0.001%.

6.5 Additional Suitability Considerations

6.5.1 The suitability of soils as a growing medium (irrespective of the risk to human health) could be evidenced through sampling and analysis in accordance with BS:3882 (2015). Whilst desirable, this recommendation does not form part of the remedial strategy and have been included for reference.

6.6 Verification of Material Placement

- 6.6.1 Upon completion of the topsoil strip and replacement exercise, a site visit is necessary to undertake inspection pits, sample the soils, and to verify adherence to this Remediation Strategy.
- 6.6.2 The inspection pits should penetrate the full depth of imported soils and progress through the natural subsoil to a depth of at least 600mm to allow for a visual inspection of the soils to confirm suitability.
- 6.6.3 Verification must be completed by a competent geoenvironmental consultant, with a record of each visit made for inclusion in the Verification Report.
- 6.6.4 Based upon the development proposals, the following number of inspection pits are required. Each pit must penetrate the full depth of the cover system.
- communal gardens: Total of 5 pits.

6.7 Verification Strategy - Summary

6.7.1 The following table summarises the design and verification requirements.

Area	Minimum Thickness	Composition	Visual Verification	Chemical Verification
Communal gardens and soft landscaping	150mm to 300mm	Imported topsoil	5 pits.	Frequency: 1 sample / 50m ³ Min. of 3 per material source and type.
	N/A	Site-won subsoil		Testing Schedule: Metals, speciated PAHs, banded TPH, asbestos screening

Table 5: Verification Plan Summary

7 Verification Report

7.1 General Requirements

- 7.1.1 The verification requirements discussed above should be compiled into a Verification Report, which is to be produced on completion of the remedial works.
- 7.1.2 As part of the Verification Report, any imported materials should be clearly documented, including source certificates, delivery notes, and site plans. The results and frequency of verification testing undertaken should also be documented, along with confirmation of the materials suitability for use.
- 7.1.3 Records of the on-site inspections must be included within the Verification Report, and include a hole location plan, logs of the excavation and photographic record as a minimum.

7.2 Client / Contractor Requirements

- 7.2.1 Supporting information will be required from the client and their contractors. This includes the following:
- Photographic evidence of the stripping and removal of topsoils.
 - Photographic evidence of the laying of replacement topsoil materials.
 - Signed delivery tickets, or alternative tracking system for imported loads, to include a summary of the type and volume of materials imported.
 - All soil waste transfer documentation
 - Details on any unexpected ground conditions encountered and contingency arrangements that had to be implemented.

7.3 Report Requirements

- 7.3.1 The Validation Report will include the following, where appropriate:
- A summary of remedial requirements.
 - A concise summary of material types, sources and volumes imported.
 - Lines of evidence to demonstrate compliant and effective material management, including confirmation of source, volumes and suitability of all site-won and imported materials, delivery notes, waste transfer and consignment notes and chemical testing records.
 - Details demonstrating the chemical and physical suitability of the replacement topsoil materials.
 - Details of any unexpected or unencountered materials encountered, along with further investigative and remedial action undertaken.
 - Statements confirming if the remedial objectives have been met, and if the site is suitable for its proposed use.

8 Further Works and Recommendations

8.1 Previously Unencountered or Unexpected Contamination

- 8.1.1 This remediation strategy only considers contamination identified to date. If during development, contamination not previously identified is found to be present at the site, then a standalone report providing a risk assessment and updated remedial strategy may be required. In such instances, this will need to be reported to the Local Authority.

8.2 On-site verification inspections

- 8.2.1 At least one site visit will be required by a competent geo-environmental consultant to undertake verification works for the remedial clean cover, to carry out:

- i. Sampling and inspection of replacement topsoil materials to confirm suitability.
- ii. Excavation of hand-dug inspection pits across soft landscaping areas to confirm suitable depth.

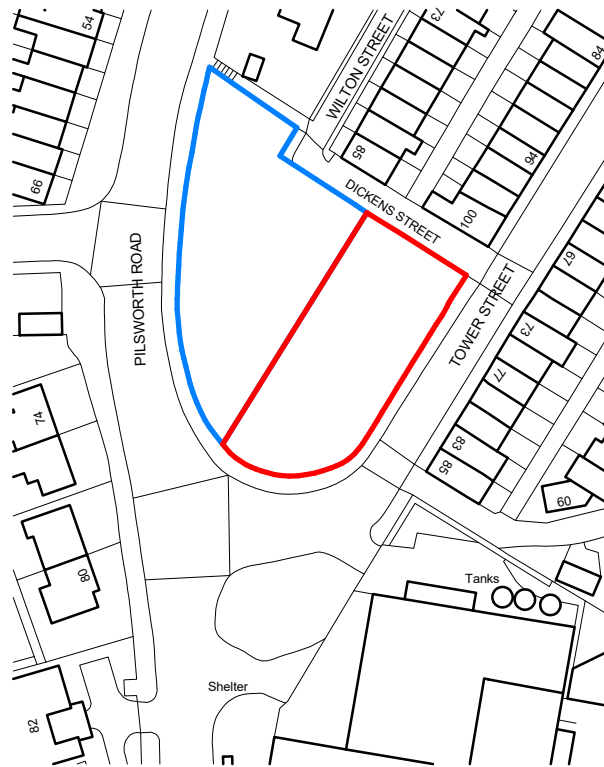
8.3 Verification Report

- 8.3.1 A Verification Report will be required to demonstrate the effective remediation of the site.

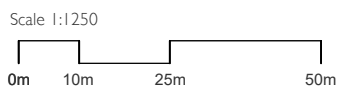
Appendix A Drawings

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LEGEND

- Application site boundary and all land necessary to carry out the proposed development
- Other land owned by the applicant that is close to or adjacent to the property

SITE LOCATION PLAN

A 20.12.23 JS Issued for full planning application.
Rev. | Date | By | Remarks

 TRIANGLE ARCHITECTS Tel: 0161 272 3500 E-mail: studio@trianglearchitects.co.uk Web: www.trianglearchitects.co.uk Twitter: @TriangleArch Raven House, 113 Fairfield Street, Manchester, M12 6EL	Client:	Date: Dec'2023	Drawing Purpose:		
	Cornerstone Place	Scale 1 : 1250 @ A3:	PLANNING		
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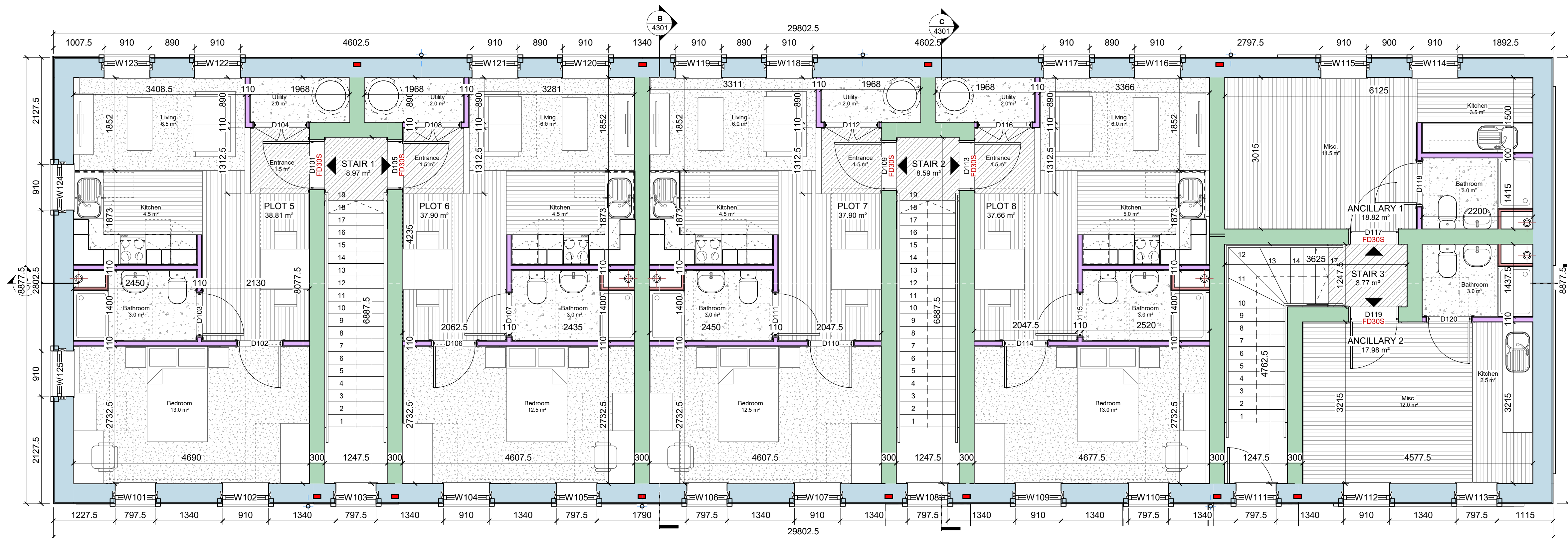
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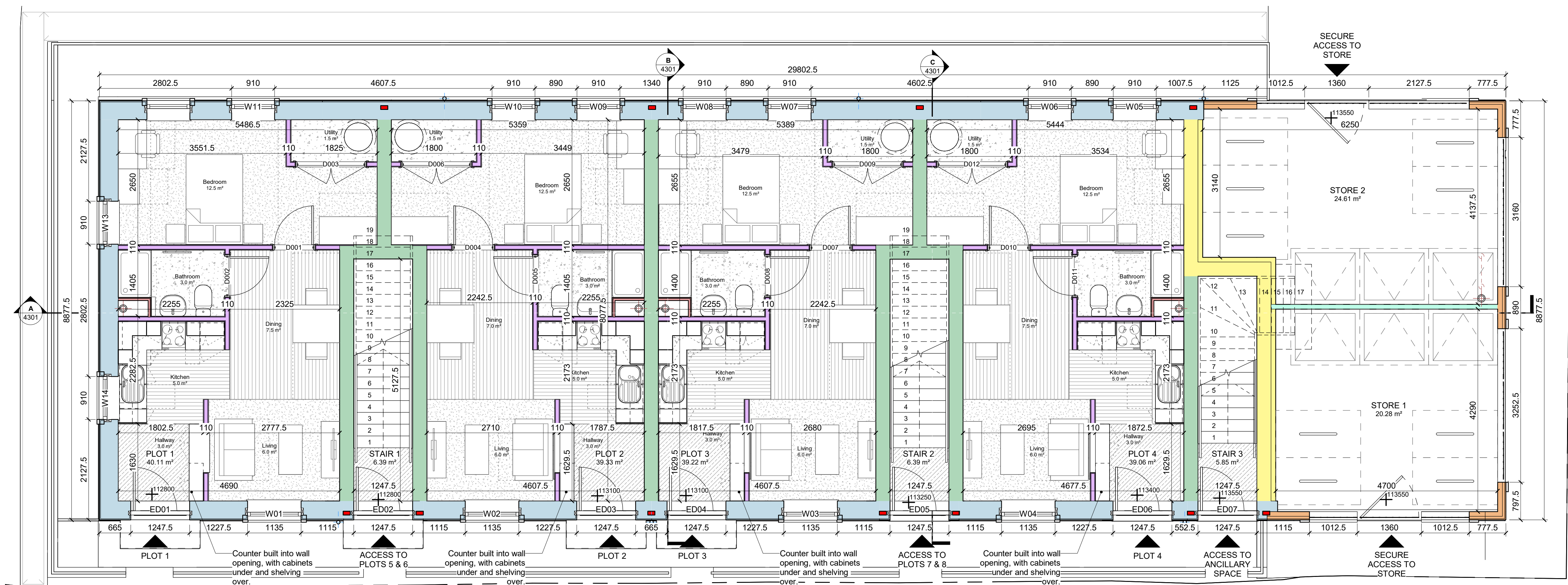
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■ DRAWING TO BE READ IN CONJUNCTION WITH THE HEALTH & SAFETY PLAN AND ALL RELEVANT RISK ASSESSMENTS AND THE FOLLOWING DRAWINGS:



FIRST FLOOR GA PLAN



GROUND FLOOR GA PLAN

Scale 1:50

0m 0.5m 1m 2.5m

P01 09.02.24 JS RIBA S4 issue for tender.

Rev Date By Remarks

Client:			Cornerstone Place
Project Name:			Pilsworth Road Phase 1
Drawing Name:			GA Floor Plans
Drawing Purpose:			TENDER
Project Number:	Drawing Number:	Revision:	
23-030	4100	P01	
Scale @ A1	Drawn:	Checked:	Date:
1 : 50	JS	AJD	February 2024

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Appendix B Discovery Strategy

Contamination Discovery Strategy: Procedure

1 General

- 1.1 With the development of any site, there is a residual risk of contamination being found that is unexpected or has not previously been identified.
- 1.2 As a precaution, the Principal Contractor should adopt this Discovery Strategy for dealing with unexpected contamination or encountering underground storage tanks.
- 1.3 The Principal Contractor should also ensure it is distributed and communicated appropriately to all relevant ground workers.

2 Step 1: Halting Works & Consultant Notification

- 2.1 Should any previously unidentified contamination be encountered, works should be made safe then temporarily halted in the affected area, and Soiltechnics (The Consultant) informed within 24hrs.
- 2.2 If, due to site constraints, the contaminated materials need to be excavated prior to being assessed, the Contactor should segregate the material as best as is reasonably practicable, based upon visual and olfactory observations. The contaminated materials should then be stockpiled on an impermeable surface and covered with impermeable sheeting.

3 Step 2: Initial Assessment & Regulatory Notification

- 3.1 The Consultant must liaise with the contractor and undertake an initial assessment within 48 hours of notification to determine if the event qualifies as ‘potentially significant unexpected contamination’.
- 3.2 Where the initial assessment does not consider the contamination to be potentially significant and unexpected, works can recommence.
- 3.3 The Planning Authority and Pollution Regulatory Team must be contacted within 2 working days if the contamination poses a significant risk to health.

4 Step 3: Contamination Assessment and Remedial Strategy

- 4.1 Where *potentially significant unexpected contamination* is confirmed, the Consultant must produce a Discovery Event Report which includes a description and risk assessment of the contamination.
- 4.2 A phase of intrusive investigation works may be required to inform the risk assessment.
- 4.3 Where remediation is required, the report must include a remedial and verification strategy..
- 4.4 Within 24 hours of completion, the Discovery Event Report must be provided to the Local Authority for their approval, and a copy held for appending to the project Verification Report.

5 Step 4: Recommencement and Implementation

- 5.1 Works can only recommence upon specific instruction from the Consultant and once the Discovery Event Report has been submitted to the Local Authority.
- 5.2 All remedial works must be implemented and verified in full. The event-specific Verification Report (if required) must be submitted to the Local Authority for approval.

Contamination Discovery Strategy: Contractor Site Guide

Discovery Event

- Previously unidentified contamination is encountered.
- This includes encountering underground storage tanks (UST).

Halt Works in Area

- Make the area safe.
- Halt works in the affected area.
- Stockpile any contaminated arisings on an impermeable surface and cover with impermeable sheeting.
- Works to recommence only upon instruction from the Consultant (Soiltechnics Ltd).

Inform the Consultant

- Contact Soiltechnics (the Consultant) within 24 hours.
- Tel: 01604 781 877
- E-mail: enquiries@soiltechnics.net

Assessment

- An initial assessment must be carried out by Soiltechnics to determine the appropriate course of action.
- A detailed assessment and a sampling exercise may be required.
- Approval from the Local Authority may be required.

Remediation

- Remedial work may be required.
- In some instances, remediation will have to be completed before works in the area can recommence. In this case, the Local Authority will require submission and approval of a Verification Report prior to commencement.