
Remediation Method Statement

at: Woodfords,
Shipley Road, Southwater
RH13 9BQ

for: Bellway Homes Ltd

Report Reference: 3750965/RMS/3

Report Date: 30 July 2026

LEAP ENVIRONMENTAL GENERAL NOTES

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Title: Remediation Method Statement: Woodfords, Shipley Road, Southwater RH13 9BQ

Client: Bellway Homes Ltd

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Revision control sheet				
Revision ref.	Date	Reason for revision	Amended by:	Approved by:
Rev 00	23/07/2025	First issue	n/a	see above
Rev 01	17/07/2026	Updated following additional investigation and CLO comments	HP	TT
Rev 02	30/07/2026	Updated following CLO comments	TT	WF

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Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

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1 INTRODUCTION AND BACKGROUND

1.1 Authority

RSK Environment Ltd trading as Leap Environmental (hereafter referred to as **LEAP**) were engaged by Bellway Homes Ltd herein referred to as the “Client” to provide a Remediation Method Statement for the Woodfords site located at Shipley Road, Southwater RH13 9BQ.

The works were undertaken by means of **LEAP**’s fee proposal letter dated 30 April 2025, reference LPQ12249 including RSK Standard Terms and Conditions [Issue No13 April 2025] which forms the appointment between **LEAP** and the Client.

References in this report to ‘we’, ‘us’ or ‘our’ shall mean Leap Environmental as a trading name of RSK Environment Limited (company no.SC115530) at registered address 65 Sussex Street Glasgow G41 1DX.

The report should be read and used in accordance with the limitations and constraints identified in the report text, and at **Appendix A** – Service Constraints.

The Woodfords site comprises approximately 3.8 hectares (Ha) and is located at NGR TQ155250, with the nearest postcode being RH13 9BQ (Drawing Ref: 3750965-LW-111-XX-D-G-11101-C01, **Appendix B**).

1.2 Objective

The site has been the subject of numerous previous investigations by **LEAP** (detailed in section 1.3 below). We understand that the site has outline planning permission with Horsham District Council (HDC) to erect 73 No. dwellings with associated infrastructure, in line with planning application reference DC/21/2180, and it is understood that Bellway are currently preparing a reserved matters application, which will require information and clearance of conditions included within the outline planning application. The following conditions relate to contamination:

- Condition 7 (pre commencement) – relates to an intrusive investigation scheme (a) to investigate contamination and details of remediation (b) to deal with the contamination.
- Condition 20 (pre occupation) – relates to the submission of a verification plan to outline the remedial works have been completed as per condition 7 (b).
- Condition 21 (pre occupation) – Requirement to submit details of chemical testing/assessment of soils proposed to be used within the proposed development

The proposed layout plan is presented in Drawing ref: 3750965-LW-116-XX-D-G-11601-C01, **Appendix B**.

A Remediation Method Statement (RMS) is required to support the aforementioned condition 7(b) of the planning application and set out what will be needed for the report required for conditions 20 & 21.

The objectives of this report are to:

- Summarise the site history, which informs the areas requiring remediation
- Detail the remediation required
- Detail the verification reporting requirements

The initial version of this RMS set out a need for further investigation to be completed within central areas of the site which had been inaccessible during previous investigations. This additional investigation has now been completed and this RMS updated to reflect its findings as well as comments provided by the Local Authority Contaminated Land Officer.

1.3 Previous studies

The site has been the subject of previous investigations by RSK/LEAP. The following site investigation reports are available and the reader is referred to these earlier reports which should be read in conjunction with this report.

- Phase I Desk Study at Woodfords, Shipley Road, Southwater RH13 9BQ ref: LP2354 Issue 3 dated 20 September 2021 (Original Issue 10 November 2020) by LEAP for Reside Holdings Ltd.
- Phase II Site Investigation at Woodfords, Shipley Road, Southwater RH13 9BQ ref LP2826 issued on 8 March 2022 by LEAP for Reside Holdings Ltd.
- Letter of Reliance issued on 11 February 2025 by LEAP to Bellway Homes for the aforementioned LP2354 and LP2826.
- Additional Chemical Testing Letter report ref SH/22/LP2910 by LEAP issued 21 April 2022
- Woodfords Shipley Road - Additional Site Investigation Report ref HP/26/3750965/AdSI-I2 issued on 13 May 2026 by RSK Geosciences for Bellway Homes

1.4 The Site

The site has been subject to previous investigations by RSK/LEAP as listed in Section 1.3. The relevant information from these reports to support development of the preliminary risk assessment (PRA) relevant to inform the Remediation Method Statement is summarised in **Table 1** below.

Table 1: Summary of the site; description, history and environmental setting

Information ¹	Details
Name and site address	Woodfords, Shipley Road, Southwater RH13 9BQ
National Grid Reference	TQ155250
Site area	c. 3.8 ha
Topography and elevation	The site is reasonably level, with a slight <2° slope down towards the southeast. The site lies along the regional slope of Shipley Road to the south-east.
Site description and current use	The site comprises a central residential property with outbuildings, swimming pool and stable. The northern field contains a riding sand school, and the southern field is used as a paddock. Additionally, there is a static home, believed to be used in conjunction to the main residence. Two bunds were noted onsite. One runs parallel to the western boundary of the northern field, the other, runs along the eastern boundary of the sand school. Overhead power cables are located in the southeast of site. The site is bound by Shipley Road to the west, a housing estate to the north, with a pocket of ancient woodlands [Pollards Hill Woods] adjoining the north-eastern corner of the site, a drainage ditch bounds the eastern boundary with fields beyond to the east of the site. To the south lies farmhouses and open fields.
Onsite Structures	Buildings onsite of various ages and constructions. Diagonal cracking was noted along back wall of the garage building adjacent to the oil tank. A disused well was observed on site during the walkover. The well was covered at the time of the walkover and as such its depth is unknown. A ~1.5 m deep swimming pool was present in the garden of the property near the centre of the site.
Surrounding area	Shipley Road is a rural unclassified road, on the outskirts of Southwater Village. Southwater is a large commuter village, with a mainly residential character with associated amenities (schools, shops, doctors, library) in West Sussex with the A272 to the south and the A24 by-pass to the west.
Site history	The site comprised a farmhouse and arable lands from 1875 to present times, with an orchard mapped onsite briefly in the 1990s. The surrounding area is farmlands and woodlands in 1875, with a brickpit c. 800 m north and a train station c.1km north. These became disused around the 1980s and were

¹ Source: LP2354 and LP2826 (Section 1.3).

Information ¹	Details
	repurposed into the Southwater Country Park (which includes ponds and lakes used for recreation; fishing and water sports) and South Downs Link Footpath respectively. There has been much residential development in Southwater Village and Woodfords now sits on the suburban margin of what is effectively now a small town.
Geology	The site is underlain by Weald Clay Formation- mudstones
Regional hydrogeology	The Weald Clay mudstones are classified as unproductive strata. The site is not located within a groundwater source protection zone (SPZ). No licensed abstractions within 1 km.
Surface water	Nearest Surface Water comprises an onsite central drainage ditch and culvert. The closest surface water feature for which the Environment Agency have surface water quality data is 800 m to the east for an unnamed tributary to Knepp Mill Stream. 3 discharge consents are present within 250 m of the site, the nearest is 64 m west of the site and is for the discharge of final treated effluent into the ditch to Lackenhurst Gill from a Domestic Property including farmhouse.
Flood risk	According to the Envirocheck data, the wider site is not located within a flood zone at risk from Rivers and Sea. The Envirocheck does not list the site as being at risk of Groundwater or Surface water flooding.

1.4.1 Potential Sources of Contamination

The Phase I Desk Study (LP2354) identified the following potential sources of contamination onsite:

1. Northern field western boundary soil bund: mixture of soils and wastes including glass, reinforced window glass, hexagonal bottle and wine bottles, bricks, concrete, ceramic, plastics, metal can, aerosol can 'mite spray' (insecticide), grey, brown soil containing road subbase gravel, orange clay and bonfire remnants.
2. East side of sand school soil bund; the bund is believed to comprise soil removed to level and construct the sand school.
3. East side of sand school soil bund, southern end; evidence of mixed waste burning including plastics.
4. Construction wastes; concrete and blacktop fragments stockpiled at the disused northern gate.

5. Central tree line hummocky ground; small mounds of soil and historic tennis court surface along the central drainage ditch.
6. Disconnected above ground single skinned (unbunded) c. 900 litre oil tank located near stables.
7. Above ground double skinned (bunded) 2500 litre oil tank located to rear of main residence.
8. Construction materials within the yard area around stables.

There are 3 above ground fuel storage tanks located on site, comprising the two tanks described above and a propane gas tank which supplies the static home. The site has a swimming pool, so whilst not seen during the walkover it is assumed associated chemicals are stored on site. A sketch plan showing the location of the above features is presented in Drawing ref: 3750965-LW-112-XX-D-G-11202-C01, **Appendix B**.

1.4.2 Previous site investigations

The Phase II (LP2826) investigation undertaken in January 2022 was predominantly non-targeted comprising 14 machine dug trial pits, with 8 No. samples sent for chemical testing. Additionally, one sample from each soil bund (numbers 1 and 2 listed above) was sent for chemical testing. The areas of sources 3-7 listed above were not accessible for investigation at the time of January 2022 investigation.

An additional site investigation (LP2910) was conducted in April 2022, to target sources numbers 3 – 8 listed above and comprised 6 No. hand dug pits to depths of up to 1.2 m bgl.

A further investigation (3750965/AdSI-I2) was conducted in May 2026 to investigate the central area of the site, targeting the existing structures and surrounds which had not been able to be investigated during the previous investigations. This comprised 12 No. windowless sampler boreholes to a maximum depth of 2.0 m bgl.

1.4.3 Soil contamination encountered

1.4.3.1 Phase II (LP2826)

No made ground was encountered within the investigation apart from within the soil bunds. All the exploratory holes within the fields in the north and south of the site encountered topsoil over Weald Clay. The 8 No. non targeted and 2 No. bund samples were tested for the following contaminants of concern identified from the site history and onsite observations; heavy metals, asbestos, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, BTEX and petroleum hydrocarbons [mineral oil]. None of the samples reported concentrations of any of the contaminants of concern in exceedance of its respective Res_{IHGP} GAC.

1.4.3.2 Additional Site Investigation (LP2910)

Made ground was encountered in 4 No. of the 6 No. exploratory holes. The 6 No. samples targeting areas of potential contamination onsite were tested for heavy metals, asbestos, Petroleum Hydrocarbons (TPH) and Polyaromatic Hydrocarbons (PAHs). One suspected

ACM fragment was sent for analysis. A fragment of blacktop was tested onsite for the presence of coal tar using PAK Spray.

The laboratory testing reported exceedances of the Resi_{HGP} GAC as follows:

- One sample from HP2 found a concentration of 38.6 mg/kg of arsenic marginally in exceedance of the Resi_{HGP} GAC of 37 mg/kg. HP2 targeted the mounded historic tennis court surface material along the central ditch and tree line.
- One sample from HP6 found a concentration of 9 mg/kg Benzo(a)pyrene (BaP) in exceedance of the Resi_{HGP} GAC of 5 mg/kg. HP6 targeted materials stockpiled at an abandoned access gate at the north of the site. Although testing of a fragment of blacktop with PAK spray did not confirm the presence of coal tar, this is not absolute proof of its absence given the laboratory testing reporting BaP in a sample from this area.

Drawing ref: 3750965-LW-112-XX-D-G-11205-C01 illustrates where contaminants of concern were encountered onsite exceeding the GACs.

1.4.3.3 Additional Site Investigation (3750965/AdSI-I2)

Made ground was encountered in 5 No. of 12 No. exploratory hole locations to a maximum depth of 0.90 m bgl. 14 No. samples were tested for heavy metals, asbestos, and Polyaromatic Hydrocarbons (PAHs), 6 No. of these were also tested for Petroleum Hydrocarbons (TPH).

The laboratory testing reported exceedances of the Resi_{HGP} GAC as follows:

- One sample from WS11 found a concentration of 208 mg/kg of lead marginally in exceedance of the Resi_{HGP} GAC of 200 mg/kg. The same sample also contained BaP at a concentration of 5.87 mg/kg marginally in exceedance of the Resi_{HGP} GAC of 5 mg/kg and TPH above the Resi_{HGP} GAC for some of the carbon fractions (Aro C12-C16 178 mg/kg against GAC of 140 mg/kg, Aro C16-C21 794mg/kg against GAC of 260 mg/kg, Aro C21-C35 3460 mg/kg against GAC of 1100 mg/kg) . WS11 was located in the driveway of the existing house.
- One sample from WS8 found a concentration of 18.9 mg/kg of BaP in exceedance of the Resi_{HGP} GAC of 5 mg/kg. WS8 was located in the hardstanding between the static home and the horse sand school present at the site.

1.4.4 Relevant contaminant linkages to be remediated

1.4.4.1 Soil contamination

Made ground was found to be locally impacted with arsenic, lead, BaP and TPH at concentrations marginally in exceedance of their respective Resi_{HGP} GAC. These hot spots of contamination within made ground soils pose a potential risk to future end users of the site from direct contact and ingestion pathways were these soils to remain in areas of soft landscaping and private gardens.

The elevated arsenic at HP2 is within an area of public open space within the development and does not exceed the POS_{RESI} GAC, therefore this is considered unlikely to pose a risk to onsite users and no remediation is required, however the proposed development

requires the removal of this (and the other) bund and it is considered prudent that the mounded material is removed from site and disposed of following waste protocols, to be protective of the local drainage system and ensure that any other potentially unidentified hotspots of contaminants within this material are managed.

The area where elevated BaP was reported at HP6, by the abandoned access gate to the northwest of the site, requires remedial measures to protect end users of the proposed development.

The area where marginally elevated lead and BaP and elevated TPH concentrations were encountered at WS11 within the existing driveway area requires remedial measures to protect end users of the proposed development.

The area where elevated BaP was reported at WS8, between the static home and the sand school is located within an area of proposed public open space, however, will still require remedial measures to protect end users of the proposed development.

Although contaminated made ground soils have the potential to impact underlying natural soils, the site investigations carried out to date have not identified any significantly impacted natural materials at the site.

1.4.4.2 Site Drainage

The site boundaries are marked by a series of drainage ditches. There is a central drainage ditch, that is indicated on river maps flowing towards the east. These discharge into the unnamed tributary to Knepp Mill Stream, that feeds into the Knepp Estate and eventually into the River Arun 4 km to the south of the site. Based on the concentrations and locations of contaminants recorded within soils across the site it is not considered that there is a significant risk to controlled waters from the site.

1.4.4.3 Ground gas

The site was not considered at risk of land gas based on the site history.

2 REMEDIATION STRATEGY

2.1 Summary of Approach

Non targeted site investigations across the site indicated no site wide contaminative concerns.

The main risk driver for remediation is the potential for exposure of future end users from localised hot spots of contamination identified during targeted sampling of areas of concern.

Significant made ground soils have only been identified within the bunds which are present at the site. Aside from these made ground was only encountered in the central (developed) area of the site typically to a depth of <0.5 m bgl and to a maximum depth of 0.9 m bgl.

The contamination recorded within samples of made ground from the central area of the site is considered to pose a potentially unacceptable risk if left in places where there is a risk of exposure to the identified receptors e.g. where soft landscaping areas are proposed. In these areas, contamination may impact human health through the ingestion, inhalation and dermal pathways that would be present in a residential setting.

In areas below buildings the recorded contamination is not considered to pose a risk as direct contact pathways will be severed by the presence of hardstanding.

Based on the assessments to date there is considered to be no risk to controlled waters.

Based on the above, the following remedial activities are proposed for the site:

- Removal of soil bunds from the site and disposal offsite
- Clean cover system in areas of soft landscaping within the central (previously developed) area, 600 mm clean cover placed over a geotextile marker in residential gardens and 300 mm clean cover placed over a geotextile marker in communal soft landscaping areas.

2.2 Verification and Inspection

2.2.1 Northwestern access gate hot spot (HP6)

It is understood much of the stockpiled material in the area in the northwest of the site adjacent to the abandoned access gate has already been removed from site. Remaining stockpiled materials shall be removed and disposed of in accordance with waste legislation (Section 2.6). It is essential that any soils containing blacktop fragments remaining within the hot spot area are also removed and disposed of. The top 150mm of soils within the hot spot area shall be stripped and disposed of following waste protocols. This depth shall be deepened if the stripped surface contains visible blacktop fragments. The stripped surface shall be inspected and samples tested for Benzo(a)pyrene to ensure the underlying soils have not been impacted by the stockpiled materials.

2.2.2 Soil Bunds

The site investigations noted two significant bunds onsite; one east of the sand school and the other along the northwestern boundary, Drawing Ref: 3750965-LW-112-XX-D-G-11204-C01, **Appendix B**. The material comprising these bunds shall be excavated and disposed of offsite following relevant waste legislation as detailed in section 2.6. The stripped surface shall be inspected and samples tested for a standard suite of contaminants to ensure the underlying soils have not been impacted by the stockpiled materials. Section 3.2 details the verification requirements further. Additional excavation or remedial works may then be required should contamination be identified.

2.2.3 Central Area of Site

Elevated concentrations of contaminants (lead, BaP and TPH) have been identified at two locations within the made ground encountered within the central (developed) area of the site. Given the limited thicknesses of made ground present across this area and the generally low levels of contaminants identified within the made ground soils it is considered that a clean cover system within areas of soft landscaping would be appropriate to mitigate against the potentially complete contaminant linkages.

Within the previously developed areas of the site in areas where soft landscaping is proposed, the Made Ground shall be excavated to a minimum depth of 600/300 mm (private gardens/communal soft landscaping) below final levels and removed from site. Where natural soils are encountered at shallower depths then excavation and removal can cease.

In areas of soft landscaping where Made Ground soils have been excavated, the provision of a minimum of 150 mm of suitably clean topsoil is required, with the remainder of the additional cover system to a minimum final depth of 600 mm in residential gardens and 300mm in communal areas comprising clean subsoil beneath the topsoil in areas of soft landscaping. The clean cover soils shall be placed over a geotextile separator layer.

Requirements for testing and verification of the clean cover system are provided in Section 3 below.

In the area of made ground soils across the central area of the site, verification will be undertaken by the Environmental Consultant at the frequency detailed in section 3.4 to confirm that a sufficient depth of cover system has been placed, or that the made ground has been removed completely from proposed garden and soft landscaped areas. Photographs of all inspections will be taken and included within the verification report.

2.2.4 Soil Testing Requirements

It is envisaged that the site will utilise site won topsoil and subsoil, which will require testing against the BS3882:2015 and BS8601:2013 to ensure suitability for use. Given the underlying geology of Weald Clay the soils may not be suitably free draining and import of topsoil and subsoil may be required. The reuse of onsite materials should be conducted under a suitable scheme (section 2.6).

In general terms, all site won and imported soils will be approved by a Verification Engineer / Environmental Consultant prior to re-use or importation. Where it is proposed to import soils then the proposed sources will be assessed on the basis of either a detailed site

investigation or laboratory test results in the case of a manufactured topsoil. In the absence of this data then a Verification Engineer / Environmental Consultant will advise what further testing, if any, is required prior to importation.

The test frequency for chemical suitability will be as follows (to be confirmed by a Verification Engineer / Environmental Consultant on a source by source basis depending on the quality of data available prior to use/importation) and shall be utilised for imported and site won materials:

- Subsoil – 1 No. sample per 150-300 m³
- Topsoil – 1 No. sample per 100-150 m³
- Brownfield site – 1 No. sample per 50 m³

All imported and site won soils will be subject to the test parameters as follows irrespective of the depth at which they are to be placed and whether they are considered subsoil or topsoil.

All sources shall have a minimum testing of 3 samples per source.

For soils imported from a greenfield or manufactured source and for site won soils the following testing shall be undertaken:

- Metals/metalloids (As, Cd, Cr, CrVI, Cu, Hg, Ni, Pb, Se, Zn)
- PAH (USEPA 16)
- Asbestos
- pH
- SOM/TOC

For soils imported from a brownfield site then the soils shall be tested for the parameters as above with the addition of the following:

- TPH (CWG banded)

2.2.5 Verification

All remediation works will be verified by a Verification Engineer / Environmental Consultant through a process of regular site inspections and, as appropriate, soil sampling and laboratory analysis. This shall also include inspection visits to confirm the removal of the bunds.

The Verification Engineer / Environmental Consultant will thereby maintain a watching brief, although the ultimate responsibility for delivery of the remediation strategy remains with the developer.

On completion a verification report will be provided, documenting the results of the site inspections and laboratory testing, details are provided in Section 3.4.

2.3 Underground Services

Given the concentrations of contaminants recorded by works completed thus far, the need for protective barrier pipes for incoming water for land contamination is considered unlikely.

It should be noted that the Weald Clay is aggressive to concrete and the site is currently classified as DS-5 and ACEC-4 and the use of concrete pipes should be considered in the light of the aggressive ground conditions. A culvert drain is understood to remain centrally onsite the material of its construction is not recorded. It would be prudent to investigate, to confirm existence and integrity of the drain.

2.4 Discovery Strategy

It is considered possible that so far unidentified contamination may be encountered during construction/earthworks works. Where additional contamination is identified during works this will be subject to further assessment and documented accordingly. It may be necessary to recommend the removal of additional soils or to propose alternative remedial solutions.

Groundworkers shall be vigilant for the following visual or olfactory evidence of contamination during the groundworks including:

- Dark coloured staining within soils and/or oily pockets;
- Soils exhibiting hydrocarbon odours, possibly associated with staining;

Other material to be on the lookout for across the site is:

- Fibrous materials (which may contain asbestos);
- Brightly coloured soils.

On the discovery of the suspicious material/unexpected contamination during excavation works, the following sequence shall be adopted:

- 1 Contractor should assess the requirement for any additional health and safety or environmental management control measures to avoid risk to human health or pollution of the environment;
- 2 Contractor's suitably experienced person should take note of the nature and extent of 'contamination' and immediately inform the Environmental Consultant and the Local Authority;
- 3 Working area will be cordoned off and works will cease in the vicinity;
- 4 Environmental Consultant will attend site to undertake sampling regime with subsequent laboratory testing as deemed necessary;
- 5 Findings will be discussed with the Local Authority along with the provision of the test records;
- 6 Remedial action, if necessary, and programming of the works are to be agreed with the Environmental Health / Contaminated Land Officer at the Local Authority;
- 7 Contractor is informed of the remedial action required;
- 8 Contractor prepares a Method Statement that details how the agreed remedial action will be carried out;
- 9 Method Statement is agreed by Environmental Consultant; and
- 10 Evidence of work carried out is collated for inclusion in the verification report.

2.5 Waste Disposal

It is anticipated that the proposed development will generate waste soils and materials will need to be removed from site as part of the construction process.

In line with current European Commission Regulations including the Waste Framework Directive 2014 and The Waste (England and Wales) (Amendment) Regulations 2012, and Environment Agency Guidance (WM3 2015), waste holders and their advisors (producer, carrier or disposal facility) are required to make an assessment of waste materials and classify them as hazardous, non-hazardous waste or inert.

Once the waste has been classified as either hazardous or non-hazardous and prior to disposal, further analysis may be needed to confirm whether soils to be exported meet the proposed receiver landfill site's Waste Acceptance Criteria. Where a waste is classified as non-hazardous a Waste Acceptance Classification test (WAC) is required to determine whether the material can be accepted at either an inert or non-hazardous landfill. Where the WAC test results exceed hazardous waste WAC limits that waste cannot be accepted at a hazardous landfill site without prior treatment.

In accordance with WM3, wastes containing visible asbestos contamination or asbestos concentrations greater than 0.1% by volume are classified as Hazardous.

Where soils are to be disposed off-site, it is the duty of the waste producer, to ensure that all waste is disposed of appropriately and that any that is sent to landfill is sent to an appropriately licensed one.

Where made ground soil is to be re-used on site or natural clean soils may be suitable for re-use onsite and/or transferred to another site, then it is recommended that this is carried out under the CL:AIRE Code of Practice for re-use of soils (Section 2.7 below). It should be noted that if made ground is to be re-used the MMP outlining the proposed re-use must be in place prior to the material's excavation. Made ground soils excavated without an MMP outlining this proposed re-use would be classified as a waste and must be disposed of offsite.

Waste soils awaiting testing, classification and disposal will be placed on plastic sheeting, segregated by fencing and labelled appropriately. Any potentially hazardous or inert soils will require waste acceptance criteria (WAC) testing.

Naturally occurring soils are anticipated to be classified as non-hazardous and potentially inert although confirmatory testing would be required to confirm this if they are deemed a waste and require disposal.

It is strongly advised that detailed discussions be held with remediation/groundworks contractors and that receiving landfill sites are identified in advance of commencing any waste removal

2.6 CL:AIRE Development Industry Waste Code of Practice

It is anticipated that clean natural soils will be generated from foundation and/or drainage excavations and may be suitable for re-use on site, however, the requirement for the reuse of these excavated soils maybe limited. The re-use of clean naturally occurring materials does not require a permit or the production of an MMP; however it is considered good

practice to have something in place prior to commencement in order to provide evidence confirming this.

If excavated soils were to be reused on-site, especially if suitable made ground is identified beneath the structures, then this should be undertaken in accordance with the DoWCoP. The Guidance presents key principals for demonstrating compliance with DoWCoP to reuse of soils as non-waste, this needs to be lines of evidence based to demonstrate that soils are not waste. Line of evidence must be set out in the Material Management Plan. Key principals to be met when reusing soils as non-waste are as follows:

- Reuse of material will not create unacceptable risk to human health or other identified receptors – i.e. risk assessment confirming suitability for reuse
- Suitability for reuse without further treatment – suitable chemically and geotechnically – must meet relevant specification – e.g. use as backfill beneath cover systems buildings or hardstanding or for site regrading
- Certainty of Use – must demonstrate that material will actually be used and is not just a probability – i.e. there is planning for the scheme and that backfill is required to make up levels or clean soils required for cover systems
- Quantities – materials used should only be in the quantities required – i.e. use of excessive material will = landfill on site as disposing waste soils that aren't required

A Material Management Plan should be submitted to a 'Qualified Person' (QP) for review and if appropriate the QP will sign a declaration that proposals within the MMP are in accordance with CoP. The QP must be independent from and have had no prior involvement with the project.

On completion a verification report must be produced documenting whether proposals set out in MMP were implemented on site – confirming volumes of material reused, reuse locations, and compliance with specifications.

3 VERIFICATION WORKS

3.1 Site Works

During the re-development works, the Verification Engineer / Environmental Consultant will observe and verify the following:

- Visual inspection of formation level once bunds have been excavated and removed offsite and sampling and testing of the underlying soils to confirm no contamination present.
- Verification of removal of made ground soils/placement of clean cover system in central (previously developed) area of site

The engineer will also be available to visit site and provide guidance should any previously undiscovered contamination be encountered.

3.2 Removal of Bunds

Once the bunds have been excavated and removed from site the Verification Engineer / Environmental Consultant will attend and inspect formation level soils from where they have been taken.

The Verification Engineer / Environmental Consultant will photograph the formation level and collect samples of the underlying soils. Samples shall be collected at a rate of approximately 1 per 50 m², with a minimum of 3 No. samples being collected from each former bund location. The samples shall be sent for laboratory testing for a suite of common contaminants and the results compared to published screening values for a residential land use.

Should either the inspection or laboratory testing results indicate the presence of contamination then this shall be dealt with in accordance with the discovery strategy.

3.3 Verification Testing of Imported soils/Site-won soils

As stated in the remediation strategy above (Section 2), the Environmental Consultant will approve imported soil sources prior to use based on site investigation and/or test results as well as the reuse of site-won soils.

Once a source has been approved for importation the Environmental Consultant will complete onsite inspection and verification testing. Where imported from a manufacturer or greenfield site, topsoil will be tested at a minimum frequency of one sample per 150 m³ imported and subsoil at a minimum frequency of one sample per 300 m³ of imported soil with a minimum of three samples per source of material in both cases. Soils imported from brownfield sites would be tested at the higher frequency of one per 50m³. Testing will be undertaken at a UKAS and MCERTS accredited laboratory.

All imported soils will be required to meet the specification as given in **Appendix D** irrespective of the depth at which they are to be placed. Any unsuitable material will be removed from site.

The testing regime was detailed in section 2.2.4.

Site-won soils which are proposed for reuse will require verification testing following their excavation once exact quantities are known to confirm their chemical suitability. The testing regime for site won natural soils is one sample per 100 m³.

The reuse of any imported topsoil or subsoil 'site-won' from another site will require a Materials Management Plan (MMP) with a declaration signed by a Qualified Person (QP) in accordance with the CL:AIRE Definition of Waste Code of Practice (DoW CoP). Manufactured topsoil with appropriate end of waste certification is exempt from the CoP. The CoP cannot be used to import Made Ground

3.4 Clean Cover System Details

Where no made ground remains beneath areas of soft landscaping then there are no requirements as to the thickness of placed cover soils in these areas.

All areas shall be inspected prior to the placement of any soft landscaping to confirm whether made ground is present. In the central area of the site this confirmation shall be completed by the Environmental Consultant, whilst in the remainder of the site the confirmation can be completed by either the Environmental Consultant or the Contractor. These inspections shall be recorded photographically.

Where made ground does remain in areas of proposed soft landscaping then the depth of the placed topsoil and subsoil layers and the presence of the geotextile separator layer will be verified by the Environmental Consultant by the excavation of hand dug holes through completed areas. This depth will be specified to meet the requirements of this RMS as well as the NHBC and the landscaper. These verification holes will be randomly placed at a rate of 1 in every 2 garden areas and in areas of soft landscaping will be at a rate of approximately 1 every 100 m².

3.5 Verification Report

All verification works will be presented in a final verification report upon completion. This report will comprise the results of the additional investigation carried out as well as source certificates, delivery notes and test results of imported soils and photographic records showing any stockpiling areas and demonstrating the placement of the soils. On receipt, the verification report shall be submitted to the Local Planning Authority (LPA) to enable the discharge of planning conditions related to contaminated land.

All relevant information shall be collected during the remediation works and a validation report compiled on completion and comprise as a minimum:

- A summary of the background site information and the RMS;
- Parties involved in the works;
- Details of any hitherto undiscovered contamination along with its remediation and verification;
- Waste classification and management documents to include as a minimum:
 - Volumes and destination of any materials removed from site.

- Laboratory validation test results and transfer notes for any imported materials;
- Formation level inspection records including site notes and photographs;
- Records of earthworks including as built drawings, photographs and quantities of materials;
- Records of any specialist remediation contractors works as a technical appendix if relevant (i.e. Japanese Knotweed / gas protection); and,
- Records of any variation to the agreed RMS including details of correspondence with statutory authorities.

The verification report will be submitted to local planning authority to discharge conditions listed in Section 1.2.

APPENDIX A – SERVICE CONSTRAINTS

APPENDIX A

SERVICE CONSTRAINTS

1. Service Constraints

1.1. This Report (the "Report") and any study, inspection, investigation, sampling, testing and or interpretation carried out in connection with the Report (together the "Services") were compiled and carried out by RSK Environment Limited (RSK) trading as RSK Geosciences, for the Client named in the first paragraph of the Report (the "Client") in accordance with the terms of an RSK Fee Proposal including RSK Environment Standard Terms and Conditions (the "Appointment") between RSK and the Client, unless otherwise stated in the first paragraph of the Report. The Services were performed by RSK with the reasonable skill and care ordinarily exercised by a geo-environmental consultant at the time the Services were performed. Nothing in this Report shall be construed as imposing any fitness for purpose obligation. Further, and in particular, the Services were performed by RSK taking into account the limits of the scope of works required by the Client, the time scale involved and the resources, including financial and manpower resources, agreed between RSK and the Client.

1.2 Other than that, expressly contained in paragraph 1 above, RSK provides no other representation or warranty whether express or implied, in relation to the Services. RSK shall not be liable in respect of any action or proceedings arising out of or in connection with this Report whether in contract, in tort, for breach of statutory duty or otherwise after the expiry of six (6) years from either (i) the date of the Report or (ii) such earlier date as prescribed by law, unless varied in the terms of the Appointment.

1.3 Unless otherwise agreed in writing, the Services were performed by RSK exclusively for the purposes of the Client. RSK is not aware of any interest of or reliance by any party other than the Client in or on the Services. Unless expressly provided in writing, RSK does not authorise, consent, or condone any party, other than the Client relying upon the Services. Should this Report or any part of this Report, or details of the Services or any part of the Services, be made known to any such party, and such party relies thereon, that party does so wholly at its own and sole risk, and RSK disclaims any liability to such parties. Any such party would be well advised to seek independent advice from a competent geo-environmental consultant and/or lawyer.

1.4 The Client shall not, without the prior written consent of RSK, assign, transfer, charge, mortgage, subcontract, or deal in any other manner with all or any of the benefits provided in this Report. Unless specified in the Appointment, RSK shall not be obliged to assign the benefit of the Report whether by collateral warranty, third party rights pursuant to the Contracts (Rights of Third Parties) Act 1999, letter of reliance or otherwise. If RSK agrees to any assignment of the benefit of this Report, in whatever form, benefits to third parties through collateral warranties, third party rights or letters of reliance shall not be provided unless a fee for each right, warranty or letter is agreed. The form of wording used in the warranty or letter shall be provided by RSK for agreement by the Client. Any reasonable changes to the form of wording will be implemented by mutual agreement, however the terms in the warranty or letter cannot offer the third party any greater benefit than the Appointment offered to the Client.

1.5 It is the understanding of RSK that this Report is to be used for the purpose described in the introduction to the Report. That purpose was a significant factor in determining the scope and level of the Services. Should the purpose for which the Report is used, or the proposed use of the site change, this Report may no longer be valid and any further use of or reliance upon the Report in those circumstances by the Client without the review and advice of RSK shall be at the Client's sole and own risk. RSK shall not be liable for any use of this Report for any purpose other than that for which it was provided.

1.6 The passage of time may result in changes in site conditions, regulatory or other legal provisions, technology or economic conditions which could render the Report inaccurate or unreliable. The information and conclusions contained in this Report should not be relied upon in the future without the written advice of RSK. In the absence of such written advice of RSK, reliance on the Report in the future shall be at the Client's own and sole risk.

1.7 The observations and conclusions described in this Report are based solely upon the Services which were provided pursuant to the agreement between the Client and RSK. RSK has not performed any observations, investigations, studies or testing not specifically set out, or required by the Appointment between the Client and RSK. RSK is not liable for the existence of any condition, the discovery of which would require performance of services not otherwise contained in the Services. For the avoidance of doubt, unless otherwise expressly referred to in the introduction to this Report, RSK did not seek to evaluate the presence on or off site of asbestos, invasive plants, electromagnetic fields, lead paint, heavy metals, radon gas, fuel storage, persistent bio-accumulative or toxic chemicals (including PFAS and related compounds) or other radioactive or hazardous materials, unless specifically identified in the Services.

1.8 The Services are based upon RSK's observations of existing physical conditions at the Site gained from a visual inspection of the site together with RSK's interpretation of desk based publicly available information, including documentation, obtained from third parties and from the Client on the history and usage of the site, unless specifically identified in the Services and the limitations below:

- a. The Services were based on information and/or analysis provided by independent testing and information services or laboratories upon which RSK was reasonably entitled to rely.
- b. The Services were limited by the accuracy of the information, including documentation, reviewed by RSK and the observations possible at the time of the visual inspection.
- c. The Services did not attempt to independently verify the accuracy or completeness of information, documentation or materials received from the Client or third parties, including laboratories and information services, during the performance of the Services.
- d. The Client has identified in writing to RSK, the information, reports, findings, surveys and preliminary works RSK may not rely upon when providing the Services.

RSK is not liable for any inaccurate information or conclusions, the discovery of which inaccuracies required the doing of any act including the gathering of any information which was not reasonably available to RSK, and including the doing of any independent investigation of the information provided to RSK, save as otherwise provided in the terms of the Appointment between the Client and RSK.

1.9 Any site drawing(s) provided in this Report is (are) not meant to be an accurate base plan for scale measurement but is (are) used to present the general relative locations of features on, and surrounding, the site. Features (intrusive and sample locations etc) annotated on site plans are not drawn to scale but are centred over the approximate location. Such features should not be used for accurate setting out and should be considered indicative only.

1.10 Should RSK be requested to review the Report after the date of issue of this Report, RSK shall be entitled to additional payment at the existing rates, or such other terms as agreed between RSK and the Client.

2. Service Constraints where the Report provides an intrusive assessment of ground conditions:

2.1 The intrusive environmental ground investigation aspects of the Services are a limited sampling of soil from the site, at pre-determined locations based on the known historic / operational configuration of the site. The conclusions given in this Report are based on information gathered at the specific test locations and can only be extrapolated to an undefined limited area around those locations. The extent

of the limited area depends on the properties of the materials adjacent and local conditions, together with the position of any current structures and underground utilities and facilities, and natural and other activities on site. In addition, chemical analysis was carried out for a limited number of parameters (as stipulated in the scope agreed between the Client and RSK, based on an understanding of the available operational and historical information) and it should not be inferred that other chemical species (not tested) are not present.

2.2 The comments given in this Report and the opinions expressed are based on the ground conditions encountered during the site work and on the results of tests made in the field and in the laboratory. The extent of the exploratory holes, laboratory testing and monitoring undertaken may have been restricted due to a number of factors including accessibility, the presence of buried or overhead services, current development, site usage, timescales or the Client's specification. The exploratory holes only assess a small proportion of the site area with respect to the site as a whole, and as such may only provide an indicative assessment of ground conditions on site. There may be conditions pertaining to the site that have not been disclosed by the investigation and therefore could not be taken into account. In particular, it should be noted that there may be areas of made ground not detected due to the limited nature of the investigation or the thickness and quality of made ground across the site may be variable. In addition, groundwater levels and ground gas concentrations and flows, may vary from those reported due to seasonal, or other, effects and the limitations stated in the data should be recognised. The presence of hotspots of undisclosed contamination or exceptional and unforeseen ground conditions cannot be discounted.

2.3 Where the Services include Investigation of an exploratory nature or relating to physical ground works, any costings and prices provided in the Report are estimated and provided for guidance purposes only. The actual cost and time quantities shall be remeasured and shall be dependent upon the ground or other conditions, constraints present, and number and depth of the investigation locations, which shall influence the number of samples and tests required, and the quantities of soil being classified.

2.4 Asbestos is often observed to be present in soils in discrete areas. Whilst asbestos-containing materials may have been locally encountered during the fieldworks or supporting laboratory analysis, the history of brownfield and demolition sites indicates that asbestos fibres may be present more widely in soils and aggregates, which could be encountered during more extensive ground works. However, this Report does not constitute an asbestos survey. On this basis, the presence of asbestos on site cannot be discounted and a full asbestos survey should be undertaken.

2.5 Unless stated otherwise, only preliminary geotechnical recommendations are presented in this Report and these should be verified in a Geotechnical Design Report, once proposed construction and structural design proposals are confirmed. Eurocode 7 gives guidance on the type of sampling, sample quality, number and spacing of intrusive investigations, and number of laboratory tests required. It is intended that the Geotechnical Information section of this Report will fulfil the general requirements of the Ground Investigation Report as set out in section 6 of Eurocode7, although this is subject to the restrictions imposed on the investigation, as listed above. For geotechnical design, Eurocode 7 requires the Geotechnical Design Report to address both the geotechnical and structural aspects of the geotechnical design for both the limit and serviceability states. The Geotechnical Appraisal section of this Report will not meet the requirements of a Geotechnical Design Report (GDR) and should therefore be used for preliminary guidance only.

3. Service Constraints where the Report relates to Surface Water Management:

3.1 The Surface Water Management Inspection (SWMI) Report, documents provided, observations, actions, and recommendations, with respect to the management of potential pollution issues to surface waters, made during the site Inspection visit, are those present at the time of the visit, and may not represent those recorded by others on the same day.

3.2 The comments given in this Report and the opinions expressed are based on the weather, ground and ground water conditions encountered during the site work and on the results of tests made in the field and in the laboratory. However, there may be conditions pertaining to the site that have not been disclosed by the inspection and therefore could not be taken into account. In addition, groundwater levels and flows, may vary from those Reported due to seasonal, or other, effects and the limitations stated in the data should be recognised.

3.3 RSK places a degree of dependence upon oral information provided by site representatives, which is not readily verifiable through visual inspection, or supported by any available written documentation. RSK shall not be held responsible for conditions or consequences arising from relevant facts that were not fully disclosed by facility or site representatives at the time this Report was prepared.

3.4 This Report is a live document, to be continually reviewed and updated as the development progresses or other changes occur on site. RSK can only maintain the currency of this Report through the Client requesting support with supplementary site visits or attendance at meetings ahead of key stages of the development in relation to surface water management. Our risk rating assesses a number of risk factors in line with the source-pathway- receptor model and is therefore subject to constant change.

3.5 Standard design drawings are indicative. Material types, dimensions and construction details will need to be adjusted by the Client to suit the specific conditions / flows on Site.

3.6 The full responsibility for implementing the site-specific protection and maintenance measures to protect the surface water system as stated in this Report, remains with the Client and their site management team. Additional control measures may be required to achieve the objectives set out in the Surface Water Management Plan to be implemented and financed by the Client.

4. Service Constraints where the Report relates to Waste Management:

4.1 In accordance with the definition provided in the Waste Framework Directive (WFD), materials are only considered waste if 'they are discarded, intended to be discarded or required to be discarded, by the holder'. Naturally occurring soils are not considered waste if re-used on the site of origin for the purposes of development. Soils such as made ground that are not of clean and natural origin (irrespective of whether they are contaminated or not) and other materials such as recycled aggregate, do not necessarily become waste until the criteria above are met. Excavation arisings from the development may therefore be classified as waste if surplus to requirements and/or unsuitable for re-use.

4.2 It is the duty of the waste producer, to ensure that all waste is accurately classified prior to waste disposal. Technical Guidance WM3 (EA, 2018) sets out in its Appendix D requirements for waste sampling. It is a legal requirement to correctly assess and classify waste. The level of sampling should be proportionate to the volume of waste and its heterogeneity. Unless otherwise stated, the waste assessment presented in this Report should be considered as preliminary and further testing and assessment of the waste under the provisions of a Waste Sampling Plan may be required to obtain the necessary level of data required for basic characterisation of the waste in support of disposal.

4.3 Unless stated otherwise in the Report, information relating to historical operations at the site was not reviewed as part of the assessment by RSK. In addition, unless otherwise stated in the Services, RSK was not present during the collection of the samples nor had any input on the chemical testing suite. Therefore, the waste assessment and classification detailed in this Report are based solely on any information that were provided to RSK (e.g., laboratory chemical data, exploratory hole records) and were completed without prejudice for our Client.

4.4 RSK's assumes that any ground investigation data, chemical testing results etc., that were provided by the Client to inform the waste assessment and supporting review were carried out in accordance with current best practice and relevant guidance/ standards, where applicable. Thus, the

comments given in this Report and the opinions expressed are based solely on the information provided by the Client. However, it is noted that there may be conditions pertaining to the site that have not been disclosed by the investigation and therefore could not be taken into account as part of the RSK assessment.

5. Service Constraints for Construction Environmental Management Plan Reports:

5.1 This Report should be considered in the light of any changes in legislation, statutory requirement or industry practices that may have occurred subsequent to the date of issue.

5.2 The measures and comments outlined in this Report and any opinions expressed are based on the plans provided at the time and discussions with relevant parties. However, there may be conditions pertaining to the site that have not been disclosed by investigations and therefore could not be taken into account.

5.3 This CEMP is a live document and is subject to change throughout the project, as and when necessary, to ensure management of environmental aspects remains relevant, and to ensure continued compliance with legislation and commitments as they may change. RSK understands that this CEMP will be reviewed by the Client every six months and updated as and when necessary.

5.4 It is the full responsibility of the Principal Contractor/ Client to ensure that their works do not contravene legal requirements, and adherence to this CEMP alone cannot be a full defence regarding legal action against the Principal Contractor.

6. Service Constraints where the Report relates to Ground Gas Membrane Verification:

6.1 This Report is limited to the verification of the gas resistant membrane/vapour membrane/radon barrier after installation and no inspections were undertaken of the substrate (i.e. prepared ground). The Report therefore does not constitute as a full verification of ground gas protection system.

6.2 The comments given in this Report and the opinions expressed, are based on the condition of the ground gas membrane as encountered at the time of inspection by suitably qualified personnel. RSK cannot accept liability for any subsequent change to the status of the gas membrane by follow-on trades or other construction activity.

6.3 Where not designed by RSK, the verification of protection measures is carried out with reference to the gas protection design provided by the Client. RSK assume the scope of gas protection measures as determined by third parties to be correct and to have achieved any required approval from authorities.

6.4 The Ground Gas Design Report/Remediation Strategy and Verification Plan contains details of the procedures to be adopted for inspection and validation of the works. However, it should be noted that responsibility for the correct implementation of the strategy lies with the appointed contractor. RSK cannot be held responsible for any remedial works that are carried out without the agreed procedures involving either direct supervision by RSK, or inspection and validation of the works by a representative from RSK.

7. Service Constraints for Environmental Due Diligence (EDD) Reports:

7.1 The comments given in this Report and the opinions expressed are based on the information obtained and reviewed as part of the desk-based assessment. However, there may be conditions pertaining to the Site that have not been disclosed by the assessment and therefore could not be taken into account. Furthermore, no intrusive investigations, monitoring or sampling have been undertaken to confirm the environmental status of the site, therefore any comments relating to ground conditions and subsurface contamination are based solely on a review of desk-based information.

7.2 This Report describes the results of the EDD exercise. The scope of this EDD Report, where appropriate, covers legal or regulatory compliance with respect to UK or international regulations associated with environmental matters.

7.3 As with any EDD exercise, there is a certain degree of dependence upon information provided by the target company. The EDD does not include a site walkover / visit or liaison with site representatives unless identified in the Services. Therefore, the assessment is based on the available desk study information. Also, there is a certain degree of dependence upon oral information provided by site representatives, which is not readily verifiable through visual inspection, or supported by any available written documentation. RSK shall not be held responsible for conditions or consequences arising from relevant facts that were not fully disclosed by facility or site representatives at the time this EDD exercise was performed.

7.4 This Report, including all supporting data and notes (collectively referred to hereinafter as "information"), was prepared or collected by RSK for the benefit of its Client.

7.5 The comments given in this Report and the opinions expressed are based on the information obtained and reviewed as part of the desk-based assessment and the site inspection visit. However, there may be conditions pertaining to the Site that have not been disclosed by the assessment and therefore could not be taken into account. Furthermore, no intrusive investigations, monitoring or sampling have been undertaken to confirm the environmental status of the Site therefore any comments relating to ground conditions and subsurface contamination are based solely on a review of desk-based information and observations collected during the site inspection visit.

8. Service Constraints for Ground source heat energy Reports:

8.1 It is understood that this is a desktop survey only and that there are no requirements for a site walkover, service utility survey, or provision of service plans. These services can be provided upon request if required.

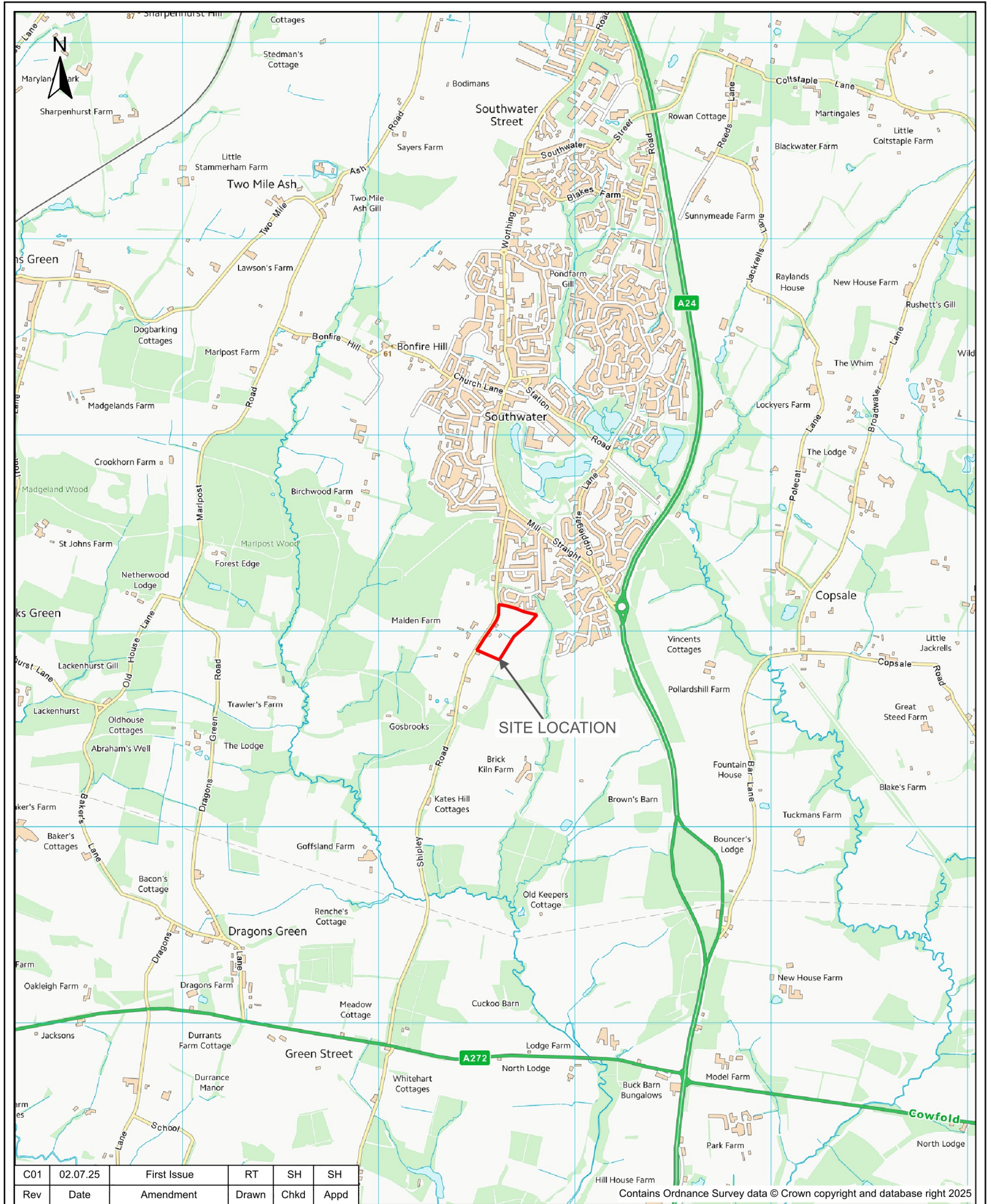
8.2 At a later stage, it is possible that a thermal response test (TRT) will need to be completed, for which a test borehole will have to be drilled, and these would be costed at the time. RSK can provide all aspects of subsequent site work for a GSHP system if required.

9. Service Constraints for Water Abstraction Borehole Reports:

9.1 The Report aims principally to only identify and assess the suitability of the site for a water abstraction borehole. This Report should be considered in the light of any changes in legislation, statutory requirements, and industry practices, that have occurred subsequent to the date of the Report.

9.2 Unless stated in the Report, the opinions expressed in this Report including all comments and recommendations provided are on the basis of the information obtained from a desk-based assessment.

APPENDIX B – FIGURES AND DRAWINGS



C01	02.07.25	First Issue	RT	SH	SH
Rev	Date	Amendment	Drawn	Chkd	Appd

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1 Forest Park Way, Pease Pottage,
West Sussex, RH11 9ZG

Client

Bellway Homes Ltd (South London)

Project Name

Woodfords, Shipley Road- Remediation Method Statement

Description

Site Location Plan

Dimension	Size	Scale	Geolocation	Project ID	Drawing no	Rev	File name
m	A4	1:25,000	515845, 124773	3750965	11101	C01	3750965-LW-111-XX-D-G-11101-C01



LEGEND

- Site Boundary
- Concrete
- Hardstanding (Other)
- Soil Bund
- Blacktop
- Area of Burning Wastes
- Sand School
- Building
- Swimming Pool
- Ditch
- Overhead Cable
- Single Skinned Oil Tank
- Double Skinned, Oil Tank
- Well
- Site Access

Notes:
Map data © OpenStreetMap contributors

C01	18.07.25	First Issue	RT	SH	SH
Rev	Date	Amendment	Drawn	Chkd	Appd



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1 Forest Park Way, Pease Pottage,
West Sussex, RH11 9ZG

Client Bellway Homes Ltd (South London)		
Project Name Woodfords, Shipley Road- Remediation Method Statement		
Description LP2354 Walkover Observations		
Project ID 3750965	Drawing no. 11202	Revision C01
File name 3750965-LW-112-XX-D-G-11202-C01		
Dimensions m	Scale 1:1,250	Size A3
01020304050 m		
		



LEGEND

- Site Boundary
- Soil Bund

Notes:
Map data © OpenStreetMap contributors

C01	18.07.25	First Issue	RT	SH	SH
Rev	Date	Amendment	Drawn	Chkd	Appd



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1 Forest Park Way, Pease Pottage,
West Sussex, RH11 9ZG

Client
Bellway Homes Ltd (South London)

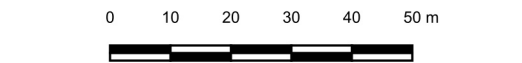
Project Name
Woodfords, Shipley Road- Remediation Method Statement

Description
Location of Soil Bunds

Project ID	Drawing no.	Revision
3750965	11204	C01

File name
3750965-LW-112-XX-D-G-11204-C01

Dimensions	Scale	Size
m	1:1,250	A3





DO NOT SCALE FROM THIS DRAWING

LEGEND

Site Boundary

Notes:

Base plan provided by the client.
Drawing Ref: 102108-BEL-SL-01 "Presentation Planning Layout"

C01	02.07.25	First Issue	RT	SH	SH
Rev	Date	Amendment	Drawn	Chkd	Appd



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1 Forest Park Way, Pease Pottage,
West Sussex, RH11 9ZG

Client

Bellway Homes Ltd (South London)

Project Name

Woodfords, Shipley Road- Remediation Method
Statement

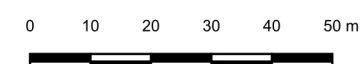
Description

Proposed Layout

Project ID	Drawing no.	Revision
3750965	11601	C01

File name
3750965-LW-116-XX-D-G-11601-C01

Dimensions	Scale	Size
m	1:1,250	A3



APPENDIX C – SPECIFICATION FOR IMPORTED AND SITE WON SOILS

3.6 Fills

3.6.1 General

Filling shall be carried out in accordance with the recommendations of BS 6031:2009² and the CL:AIRE Definition of Waste Code of Practice (DoWCoP)³.

Fill shall be maintained and protected in a satisfactory condition at all times until final completion.

Any material rendered unsuitable or unsatisfactory after being placed in the works shall be repaired or replaced as appropriate so that all the completed filling is in accordance with the specification.

3.6.2 Dimensions

Fills shall be constructed to achieve the finished levels of the development with an allowance for shrinkage and consolidation of the material subsequent to completion, and in order that the minimum clean cover as specified in the remediation method statement is achieved.

The excavated levels shall be recorded before the commencement of filling. The level of the filled areas shall be taken and recorded after filling.

3.7 Types of Fill

There are potentially two types of fill to be used. These are as follows:

- Topsoil
- Subsoil

The capping of landscaped areas will comprise a minimum of 150 mm of topsoil and a maximum of 300 mm to finished garden or landscaped area level. Underlying subsoil thicknesses will be as required to achieve the overall finished levels and to provide the required cover layer thicknesses as detailed in the main body of this report.

² BS6031:2009 Code of practice for earthworks

³ CL:AIRE The Definition of Waste: Development Industry Code of Practice Version 2, March 2011

3.7.1 Topsoil

It is recommended that imported topsoil complies with the requirements of BS 3882:2015⁴ for a Multipurpose Purpose Grade material. Where the requirements for a multipurpose topsoil are not met, discussions should be held with landscapers to identify the suitability of the topsoil.

The topsoil shall be free from fragments of glass, bricks, concrete, wire or other potentially hazardous matter.

Manufactured topsoil shall not be made from waste materials.

The topsoil shall be subject to the additional limitations set out below.

3.7.2 Subsoil

Imported manufactured or modified subsoil shall comprise certified clean material which satisfies the conditions set out in BS8601:2013⁵. Subsoil arising from site or from a certified direct transfer (e.g. under DoWCoP) shall comprise clean natural arisings from construction activities which have been confirmed acceptable by the Engineer.

3.7.3 Sources of Materials

Imported materials may be obtained from any source unless otherwise stated in the Drawings or in the Specification.

It shall remain the responsibility of the Contractor to obtain only fill material complying with the Specification and Method Statement, notwithstanding any tests which may be accepted by the Engineer.

The Contractor shall demonstrate to the Validation Engineer's satisfaction that the fill materials from each source are uncontaminated by submitting to the Validation Engineer a chemical analysis of material or evidence of such other tests as the Validation Engineer may require for all proposed sources of fill, and if necessary sampling and analysing materials as they are delivered to stockpiles or the fill location on site.

Sampling rates shall be as per the frequencies stated in the main body of the report with a minimum of three samples per source of material, unless otherwise agreed with the Engineer. Such tests for chemical composition as may be agreed by the Engineer shall be carried out on each sample and the results of tests shall be forwarded to the

⁴ BS3882:2015 Specification for topsoil

⁵ BS8601:2013 Specification for subsoil and requirements for use

Engineer. Testing for contamination on samples taken shall be carried out at a testing laboratory approved by the Engineer and shall be to appropriate MCERTS standards.

The Contractor shall maintain records of the location in the Works of fill from each source and the date of delivery to the site, and shall submit these records to the Engineer as requested. Chemical analysis on the imported fill material shall include testing for the contaminants listed in Table 1 as a minimum. Contaminant concentrations shall be below those listed in Table 1 (attached) unless agreed otherwise by the Engineer. Additional analyses may be requested depending on the source and nature of the material. The concentrations in Table 1 are derived from available assessment criteria which are considered to represent uncontaminated concentrations of soil - Suitable for Use Levels (S4ULs)⁶ for a residential land use with private gardens where produce may be grown and, in the case of the phytotoxic metals copper, nickel and zinc, the topsoil specification in BS3883:2015. The concentrations in Table 1 assume that no significant contaminant linkage to controlled waters exists that could pose an unacceptable risk.

The S4ULs represent near-minimal risk to human health. In the case of cadmium, hexavalent chromium and benzo(a)pyrene, Category 4 Screening Levels (C4SLs)⁷ also exist which are higher than minimal risk but are still strongly precautionary. In instances of persistent failures of the S4ULs for these chemicals, regulators may allow the C4SL to be used instead. This approach shall require regulatory agreement before being implemented. In addition, the following shall be deemed as unacceptable for replacement fills:

- Peat, materials from swamps, marshes and bogs.
- Logs, stumps and perishable material.
- Materials in a frozen condition.
- Clay having a liquid limit determined in accordance with BS17892-12:2018⁸., exceeding 90% or plasticity index determined in accordance with BS17892-12:2018, exceeding 65%.
- Material susceptible to spontaneous combustion.

⁶ The LQM/CIEH S4ULs for Human Health Risk Assessment, Nathaniel P et al, 2015. Copyright Land Quality Management Ltd, reproduced with permission: Publication Number S4UL3509

⁷ Defra 'SP1010: Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination – Policy Companion Document' December 2014.

⁸ BS EN ISO 17892 Geotechnical investigation and testing. Laboratory testing of soil. Determination of liquid and plastic limits

3.7.4 Practical Considerations

3.7.4.1 Formation Level / Subgrade Testing

Where made ground from previous site usage remains present at formation level then subgrade / formation level testing will be required to confirm the necessary thickness of subsoil and / or topsoil to be placed, as per the agreed remediation method statement. Sufficient time should be allowed in the programme for this testing to be completed prior to the requirement for clean cover to be laid. The standard turnaround for laboratory testing is 5 working days from the date of receipt at the laboratory.

3.7.4.2 Preparation of Subgrade

All pile mat, scaffold base and/or waste materials must be removed in their entirety from the surface of areas to become gardens or public open space / soft landscaping prior to the application of clean cover soils. This aspect of the works will be inspected and validated by the Engineer.

3.7.4.3 Out of Specification Materials

Notwithstanding the specification for maximum allowable contaminant concentrations provided in Table 1, no materials will be accepted that are odorous, stained or contain visible product as is required by DoWCoP.

Should the Contractor proceed with stockpiling or spreading of fill prior to receiving approval from the Engineer of results for the above tests, and the results of such tests show that the fill is contaminated above acceptable levels, the Contractor shall remove all contaminated material and replace it with acceptable material at his own cost as part of the main contract.

3.7.4.4 Suitability of Materials in Gardens

Materials laid as clean cover in private gardens must not only meet the requirements to be protective against land contamination but they must also be suitable for gardening. Hence, topsoil should not contain more than the British Standard-specified percentage of clay as exceeding this value may result in poor drainage and the failure of turf to establish. Subsoil should contain sufficient nutrition and be of sufficient depth to allow for the establishment of larger shrubs and trees and hence, a subsoil exceeding the British Standard-specified percentage of sand (i.e. an as-dug sand) would be unsuitable.

Table 2: Chemical Contaminant Specification for Imported Materials

Determinant	Assessment Criteria mg/kg
Arsenic	37
Cadmium	11
Trivalent Chromium	910
Hexavalent Chromium	6
Copper	100
Lead	200
Mercury (inorganic)	40
Nickel	60
Selenium	250
Zinc	200
Benzo(a)pyrene ¹	5 ²
Naphthalene ¹	2.3 ²
TPH (CWG bandings)	Various (as per S4UL residential)
Asbestos	No asbestos detected

Notes to table

1. *Surrogate markers for all PAHs.*
2. *Higher assessment criteria are possible and may be agreed with the regulator on a case by case basis, for example, depending on the Soil Organic Matter content of the imported material.*