

APPENDIX D
TOPOGRAPHIC SURVEY

[illegible]

General Notes

S1	S2	S3	
	S4	S5	S6
	S7	S8	
	S9	S10	

Co-ordinate System
This survey is produced on:
Localised version of Ordnance Survey grid

Survey Accuracy

Bench Mark Details
Levels are related to:
Levels are generated from GPS measurements & verified
by 2 local benchmarks.
1st on No.29 Prior St June Merchants Place W face
SW ang.
2nd on projecting bracket Greyfriars Ch SE face S ang.

Date	By	Revision Details

Client
Stanhope PLC
Norfolk House
31 St James Square
LONDON
SW1Y 4JJ

Title

STATION HILL
READING
ROOM

Footprint

Scale 1:100	Date 31/01/14
File 3868-T	Checked by A0 +
Sheet Number 1 OF 10	Job No. 3868

msa Pandora House
41-45 Lind Road
Sutton
Surrey
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Drawing No.	Rev.
3868-T	-

[illegible]

DOUBLE DOORS
GATE
SLOPE SYMBOL (Bottom-Top)
GLASS SYMBOL (Elevations)

STN 2	SURVEY STATION
+ 26.34	SPOT LEVEL
(2.50)	CLEARANCE HEIGHT & TAG
FS 1.00	FLOOR TO SILL HEIGHT
SH 1.50	SILL TO HEAD HEIGHT
BA 1.50	FLOOR TO BOTTOM OF ARCH
TA 2.50	FLOOR TO TOP OF ARCH

SERVICE TRACING LEGEND AND NOTES

DRAINAGE & Flow Direction

WATER (Blue line with arrow pointing right)

GAS (Green line with arrow pointing right)

ELECTRICITY (Red line with arrow pointing right)

TELECOM (Purple line with arrow pointing right)

CABLE TV (Orange line with arrow pointing right)

UNDERGROUND CHAMBER (Yellow dashed line)

Caution: Tracing of uPVC Gas Pipes Not possible, Gas Lines May Have Also Been Shown From Utility Records ONLY.

Note:
All Pipe sizes in millimeters unless stated otherwise

CAUTIONARY NOTES

ELECTRO-DETECTION TECHNIQUES HAVE BEEN USED TO OBTAIN THE LOCATION OF UNDERGROUND SERVICES. THE RESULTS ARE NOT INFALLIBLE AND TRIAL EXCAVATIONS MUST BE CARRIED OUT TO CONFIRM SERVICE IDENTIFICATION, POSITIONS AND PARTICULARLY DEPTHS. ALTHOUGH ALL REASONABLE EFFORT HAS BEEN MADE IN SEARCHING AVAILABLE RECORD DRAWINGS, THE COMPLETENESS OF THE UNDERGROUND SERVICE INFORMATION CANNOT BE GUARANTEED.



General Notes

S1	S2	S3	
	S4	S5	S6
	S7	S8	
	S9	S10	

Co-ordinate System
This survey is produced on:
Loaded version of Ordnance Survey grid

Survey Accuracy

Bench Mark Details
Levels are related to:
Levels are generated from GPS measurements & verified
by 2 local benchmarks.
1st on No.29 Friar St June Merchants Place W face
Sill ang.
2nd on projecting bracket Greyfriars Ch SE face S ang.

Date	By	Revision Details

Client
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Norfolk House
31 St James Square
LONDON
SW1Y 4JJ

Title

STATION HILL
READING

Footprint

Scale	1:100	Date	31/01/14
File	3868-T	Checked by	A0 +
Sheet Number	2 OF 10	Job No.	3868

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S1	S2	S3	
	S4	S5	S6
	S7	S8	
	S9	S10	

Co-ordinate System
This survey is produced on:
Localised version of Ordnance Survey grid

Survey Accuracy

[illegible]

Client
Stanhope PLC
Norfolk House
31 St James Square
LONDON
SW1Y 4JJ

Title
STATION HILL READING RG1 1LX

Scale 1:100		Date 31/01/14	
File 3868-T		Checked FO	A0 +
Sheet Number 3 OF 10		Job No. 3868	

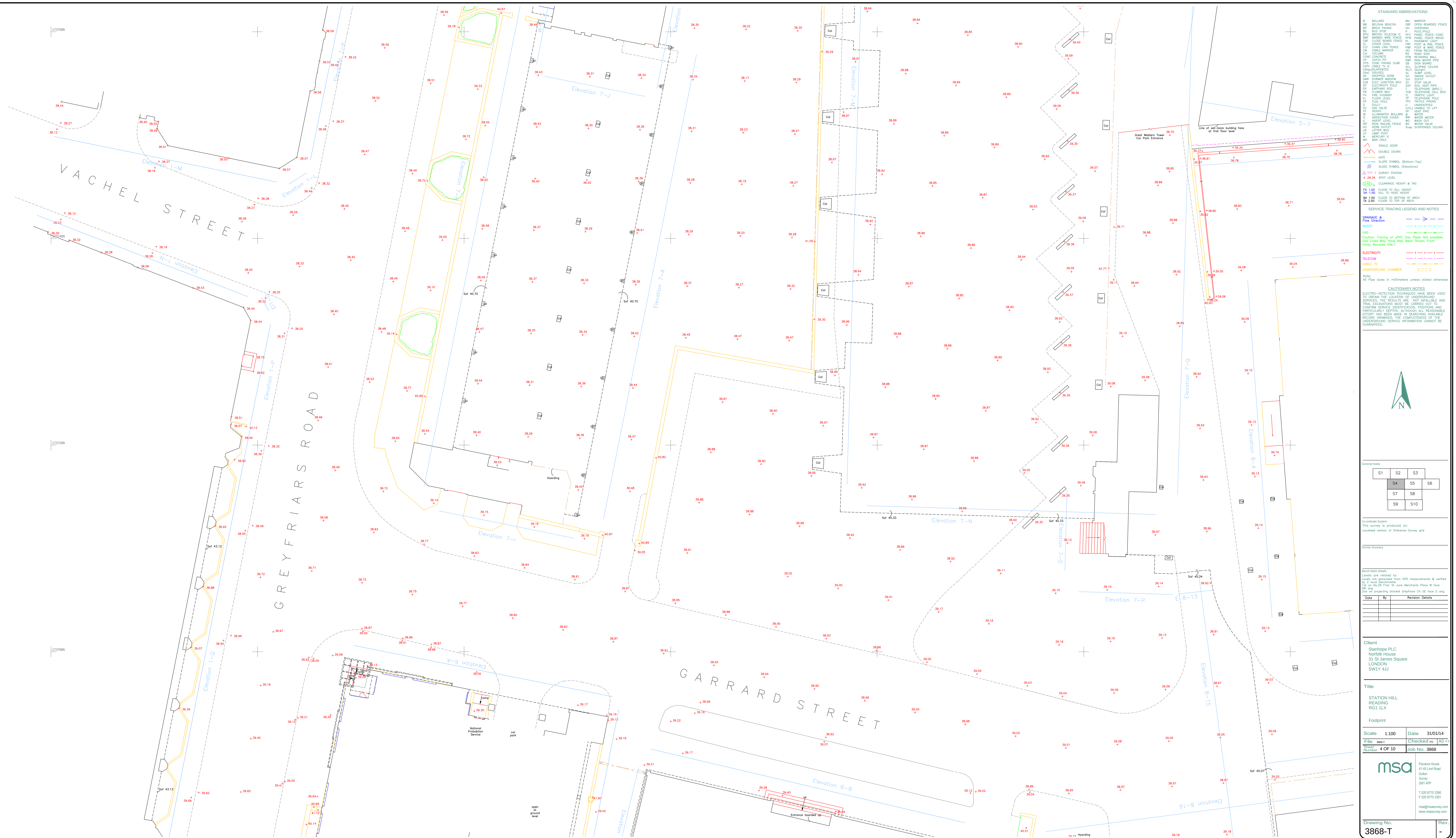
msa

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3868-T	-

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	S7	S8	
	S9	S10	

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Levels are generated from GPS measurements & verified
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1st on No.29 Friar St June Merchants Place W face
SW ang.
2nd on projecting bracket Greyfriars Ch. SE face S ang.

Date	By	Revision Details

Client
Stanhope PLC
Norfolk House
31 St James Square
LONDON
SW1Y 4JJ

Title

STATION HILL
READING
RG1 11 X

Scale	1:100	Date	31/01/14
File	3866-T	Checked by	A0 +
Sheet Number	4 OF 10	Job No.	3866

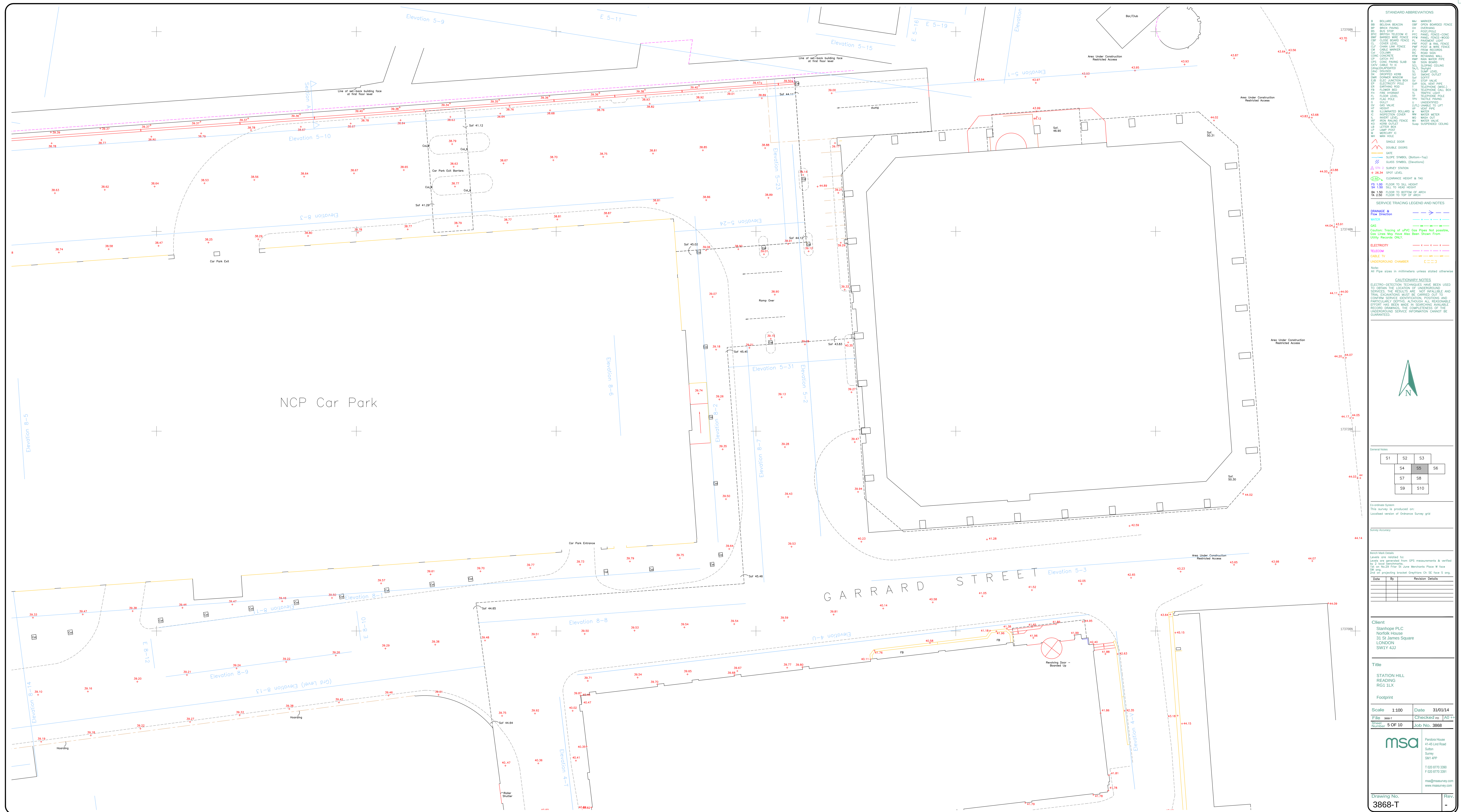
msa

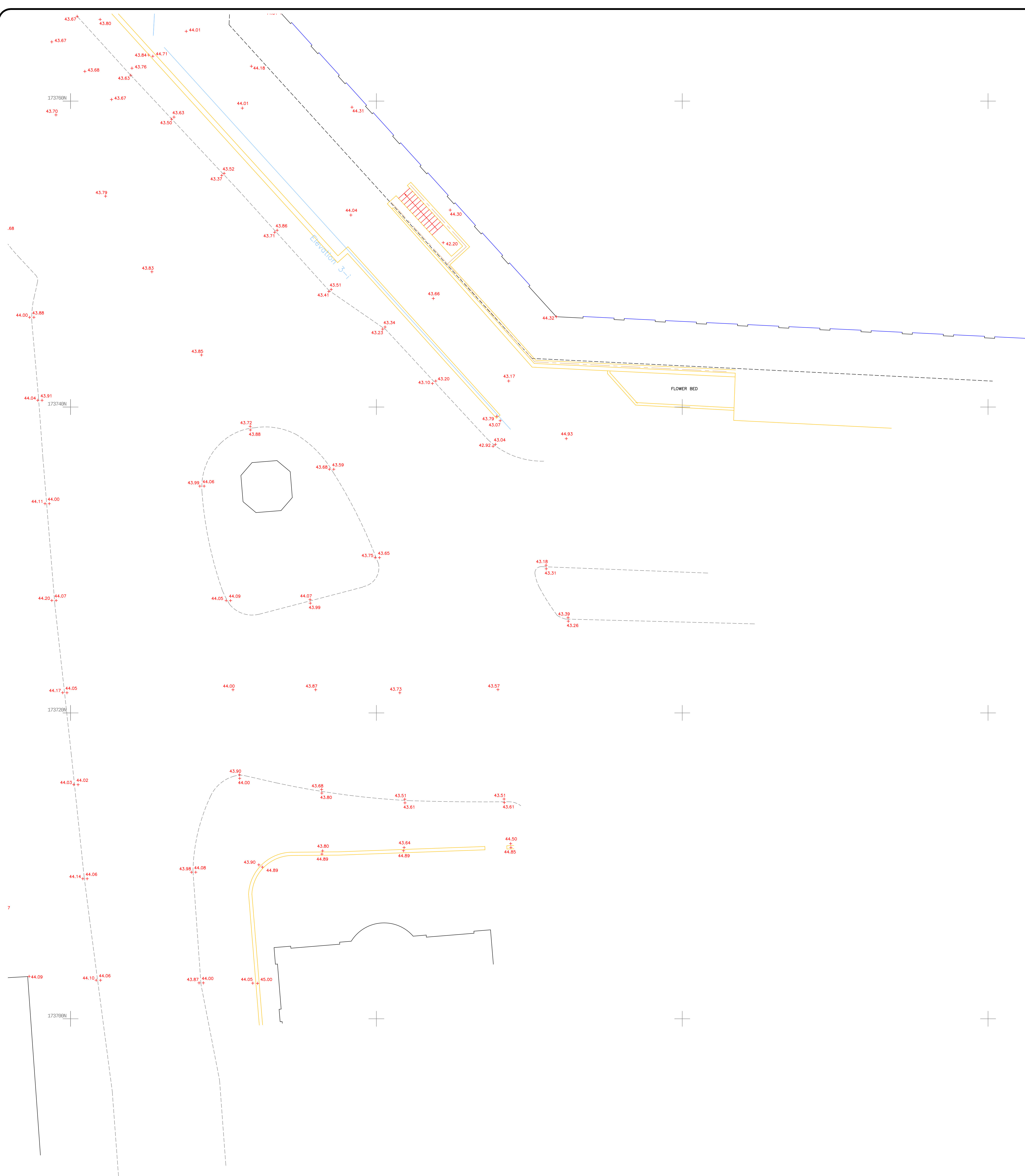
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Drawing No.	Rev.
3868-T	-

[illegible]

[illegible]

DOUBLE DOORS
GATE
SLOPE SYMBOL (Bottom-Top)
GLASS SYMBOL (Elevation)

STN 2	SURVEY STATION
+ 26.34	SPOT LEVEL
2.50	CLEARANCE HEIGHT & TAG
FS 1.00	FLOOR TO SILL HEIGHT
SH 1.50	SILL TO HEAD HEIGHT
BA 1.50	FLOOR TO BOTTOM OF ARCH
TA 2.50	FLOOR TO TOP OF ARCH

SERVICE TRACING LEGEND AND NOTES

DRAINAGE & Flow Direction

WATER ———— x ———— x ———— x ———— x ————

GAS ———— GAS ———— GAS ———— GAS ————

Caution: Tracing of uPVC Gas Pipes Not possible,
Gas Lines May Have Also Been Shown From
Utility Records ONLY.

ELECTRICITY ———— e ———— e ———— e ————

TELECOM ———— f ———— f ———— f ————

CABLE TV ———— cny ———— cny ———— cny ————

UNDERGROUND CHAMBER [] [] []

Note:
All Pipe sizes in millimeters unless stated otherwise

ELECTRO-DETECTION TECHNIQUES HAVE BEEN USED TO OBTAIN THE LOCATION OF UNDERGROUND

TO OBTAIN THE LOCATION OF UNDERGROUND SERVICES, THE RESULTS ARE NOT INFALLIBLE AND TRIAL EXCAVATIONS MUST BE CARRIED OUT TO CONFIRM SERVICE IDENTIFICATION, POSITIONS AND PARTICULARLY DEPTHS. ALTHOUGH ALL REASONABLE EFFORT HAS BEEN MADE IN SEARCHING AVAILABLE RECORD DRAWINGS, THE COMPLETENESS OF THE UNDERGROUND SERVICE INFORMATION CANNOT BE GUARANTEED.



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RG1 1LX

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Sheet Number 6 OF 10	Job No. 3868



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3868-T	-

[illegible]

APPENDIX E
LEGISLATIVE CONTEXT



Intended for

Project no.

Date
01 May 2016

LEGISLATIVE CONTEXT AND METHODOLOGIES **GROUND CONTAMINATION**

1. LEGISLATIVE CONTEXT

1.1.1. England

The regime for contaminated land was set out in Part 2A (ss.78A-78YC) of the Environmental Protection Act 1990 (EPA), as inserted by S.57 of The Environment Act 1995 and came into effect in England on 1st April 2000 as The Contaminated Land (England) Regulations 2000 (SI 2000/227). These regulations were subsequently revoked with the provision of The Contaminated Land (England) Regulations 2006 (SI 2006/1380) (as amended), which came into force in August 2006, and consolidated the previous regulations and amendments. Revised statutory guidance ("the Guidance") for local authorities on how to implement the regime, including the decision-making process on whether land is contaminated land in the legal sense, has been published by Defra and entered into force in April 2012.

Under Part 2A of the EPA Section 78A(2), "contaminated land" is defined as "land which appears... to be in such a condition, by reason of substances in, on or under the land, that –

- a) significant harm is being caused or there is a significant possibility of such harm being caused; or
- b) significant pollution of controlled waters is being caused, or there is a significant possibility of such pollution being caused".

1.1.2. Wales

The regime for contaminated land was set out in Part 2A (ss.78A-78YC) of the Environmental Protection Act 1990 (EPA), as inserted by S.57 of The Environment Act 1995 and came into effect in Wales on 1st July 2001 as The Contaminated Land (Wales) Regulations 2001 (WSI 2001/2197, W.157). These regulations were subsequently revoked with the provision of The Contaminated Land (Wales) Regulations 2006 (SI 2006/2989 W.278), which consolidated the previous regulations and amendments and added in provisions regarding radioactive contaminated land. These regulations came into force on 10th December 2006 and were accompanied by statutory guidance published by the Welsh Assembly Government in December 2006 ('the Guidance') for local authorities on how to implement the regime. The 2006 statutory guidance was replaced by the Contaminated Land Statutory Guidance - 2012 (WG19243), issued by the Welsh Government.

Under Part 2A of the EPA Section 78A(2), "contaminated land" is defined as "land which appears... to be in such a condition, by reason of substances in, on or under the land, that –

- a) significant harm is being caused or there is a significant possibility of such harm being caused; or
- b) pollution of controlled waters is being, or is likely to be caused" (Section 86 of the Water Act 2003 remains only partially implemented in Wales).

1.1.3. Scotland

The regime for contaminated land was set out in Part 2A (ss.78A-78YC) of the Environmental Protection Act 1990 (EPA), as inserted by S.57 of The Environment Act 1995 and came into effect in Scotland on 14th July 2000 as The Contaminated Land (Scotland) Regulations 2000 (SSI 2000/ 178). These regulations were subsequently revoked with the provision of The Contaminated Land (Scotland) Regulations 2005 (SSI 2005 /658), which came into force in April 2006 and consolidated the previous regulations and amendments and were accompanied by statutory guidance published by

the Scottish Government in May 2006 ('the Guidance') for local authorities on how to implement the regime.

Under Part 2A of the Environmental Protection Act 1990, "contaminated land" is defined in the Contaminated Land (Scotland) Regulations 2005 (as amended) as land which appears to the local authority to be in such a condition, by reason of substances in, on or under the land, that:

- a) significant harm is being caused, or there is a significant possibility of such harm being caused; or
- b) significant pollution of the water environment is being caused or there is a significant possibility of such pollution being caused.

1.1.4. Northern Ireland

The regime for Contaminated Land in Northern Ireland was set out in the Waste and Contaminated Land (Northern Ireland) Order 1997 (as amended). Part 3 of the Waste and Contaminated Land (Northern Ireland) Order 1997 contains the main legal provisions for the introduction of a contaminated land regime in Northern Ireland, but the regime is not yet in operation. It is noted that the Contaminated Land (Northern Ireland) Regulations 2006 and associated statutory guidance were published in draft for consultation in 2006, but have yet to be finalised. Under Part 3 of the 1997 Order, contaminated land is defined as,

"any land which appears to a district council in whose district it is situated to be in such a condition, by reason of substances in, on or under the land, that -

- (a) significant harm is being caused or there is a significant possibility of such harm being caused; or
- (b) pollution of waterways or underground strata is being, or is likely to be, caused.

"Significant harm" is defined in the draft guidance on risk based criteria and must be the result of a "pollutant linkage", which may be assessed using qualitative risk assessment models. The presence of a pollutant linkage relies on the Source-Pathway-Receptor concept, where all three factors must be present and potentially or actually linked for a potential risk to exist.

1.1.5. The Channel Islands

There is no formal contaminated land regime in the Channel Islands, as they are not part of the UK, and as such they usually adopt either the English or French legislation or create their own.

1.1.6. Isle of Man

There is no formal contaminated land regime in the Isle of Man, and they usually adopt a best 'practice approach' from a European country of choice on this basis.

1.1.7. Risk assessment Framework

"Significant harm" or "significant pollution of controlled waters" is defined in the Guidance on risk based criteria and must be the result of one or more relevant 'contaminant linkages' relating to the land.

The presence of a contaminant linkage relies on the Source-Pathway-Receptor concept, where all three factors must be present and potentially or actually linked for a potential risk to exist. For a risk of pollution or environmental harm to occur as a result of ground contamination, all of the following elements must be present:

- A source - a substance that is capable of causing pollution or harm;
- A receptor - something which could be adversely affected by the contaminant; and

- A pathway - a route by which the contaminant can reach the receptor.

If one of these elements is absent there can be no significant risk. If all are present then the magnitude of the risk is a function of the magnitude and mobility of the source, the sensitivity of the receptor and the nature of the migration pathway.

The Environment Agency Contaminated Land Report CLR 11 Model Procedures for the Management of Land Contamination provides the technical framework for structured decision making about land contamination. CLR 11 advocates a phased approach to risk assessment comprising:

- Preliminary Risk Assessment (PRA) – desk study and qualitative assessment
- Generic Quantitative Risk Assessment (GQRA) – assessment of contaminant concentrations against generic assessment criteria.
- Detailed Quantitative Risk Assessment (DQRA) – detailed site specific risk assessment and development of site-specific assessment criteria.

Each of these phases follows the same basic steps but adds site specific details and further certainty into the assessment as the stages progress. The basic steps are:

- Hazard identification and hazard assessment – development or refinement of the source-pathway-receptor conceptual model, and identification of potential pollutant linkages.
- Risk Estimation – qualitative risk estimation predicting magnitude and probability of potential consequences that may arise as a result of a hazard.
- Risk Evaluation – deciding whether a risk is unacceptable.

2. RISK ESTIMATION

An assessment of environmental risks is made for each potential pollutant linkage identified.

Risk estimation has been completed in accordance with the guidance provided in:

- NHBC and Environment Agency 2008. Guidance for the Safe Development of Housing on Land Affected by Contamination. R&D Publication 66: 2008.

The following is taken directly from NHBC/EA 2008. The key to the classification is that the designation of risk is based upon the consideration of both:

- a) the magnitude of the potential consequence (*i.e.*, severity) [takes into account both the potential severity of the hazard and the sensitivity of the receptor];
- b) the magnitude of probability (*i.e.*, likelihood) [takes into account both the presence of the hazard and receptor and the integrity of the pathway].

Table 1: Classification of Consequence (after NHBC/EA 2008)

Category	Definition
Severe	Highly elevated concentrations likely to result in "significant harm" to human health as defined by the EPA 1990, Part 2A, if exposure occurs. Equivalent to EA Category 1 pollution incident including persistent and/or extensive effects on water quality; leading to closure of a potable abstraction point; major impact on amenity value or major damage to agriculture or commerce. Major damage to aquatic or other ecosystems, which is likely to result in a substantial adverse change in its functioning or harm to a species of special interest that endangers the long-term maintenance of the population. Catastrophic damage to crops, buildings or property.
Medium	Elevated concentrations which could result in "significant harm" to human health as defined by the EPA 1990, Part 2A if exposure occurs. Equivalent to EA Category 2 pollution incident including significant effect on water quality; notification required to abstractors; reduction in amenity value or significant damage to agriculture or commerce. Significant damage to aquatic or other ecosystems, which may result in a substantial adverse change in its functioning or harm to a species of special interest that may endanger the long-term maintenance of the population. Significant damage to crops, buildings or property.
Mild	Exposure to human health unlikely to lead to "significant harm". Equivalent to EA Category 3 pollution incident including minimal or short lived effect on water quality; marginal effect on amenity value, agriculture or commerce. Minor or short lived damage to aquatic or other ecosystems, which is unlikely to result in a substantial adverse change in its functioning or harm to a species of special interest that would endanger the long-term maintenance of the population. Minor damage to crops, buildings or property.
Minor	No measurable effect on humans. Equivalent to insubstantial pollution incident with no observed effect on water quality or ecosystems. Repairable effects of damage to buildings, structures and services.

* For these purposes, disease is to be taken to mean an unhealthy condition of the body or a part of it and can include, for example, cancer, liver dysfunction or extensive skin ailments. Mental dysfunction is included only insofar as it is attributable to the effects of a pollutant on the body of the person concerned.

The likelihood of an event (probability) takes into account both the presence of the hazard and target and the integrity of the pathway and has been assessed based on the categories given below.

Table 2: Classification of Probability (after NHBC/EA 2008)

Category	Definition
High Likelihood	There is pollutant linkage and an event would appear very likely in the short-term and almost inevitable over the long-term, or there is evidence at the receptor of harm or pollution.
Likely	There is pollutant linkage and all the elements are present and in the right place which means that it is probable that an event will occur. Circumstances are such that an event is not inevitable, but possible in the short-term and likely over the long-term.
Low Likelihood	There is pollutant linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a long period such an event would take place, and is less likely in the shorter term.
Unlikely	There is pollutant linkage but circumstances are such that it is improbable that an event would occur even in the very long-term.

The potential severity of the risk and the probability of the risk occurring have been combined in accordance with the following matrix in order to give a level of risk for each potential hazard.

Table 3: The Classification of Risk (after NHBC/EA 2008)

		Consequence			
		Severe	Medium	Mild	Minor
Probability	High Likelihood	Very high	High	Moderate	Low
	Likely	High	Moderate	Moderate/ Low	Low
	Low Likelihood	Moderate	Moderate/ Low	Low	Very low
	Unlikely	Moderate/ Low	Low	Very low	Very low

Very high risk

There is a high probability that severe harm could arise to a designated receptor from an identified hazard at the site without remediation action OR there is evidence that severe harm to a designated receptor is already occurring. Realisation of that risk is likely to present a substantial liability to be site owner/or occupier. Investigation is required as a matter of urgency and remediation works likely to follow in the short-term.

High risk

Harm is likely to arise to a designated receptor from an identified hazard at the site without remediation action. Realisation of the risk is likely to present a substantial liability to the site owner/or occupier. Investigation is required as a matter of urgency to clarify the risk. Remediation works may be necessary in the short-term and are likely over the longer term.

Moderate risk

It is possible that harm could arise to a designated receptor from an identified hazard. However, it is either relatively unlikely that any such harm would be severe, and if any harm were to occur it is more likely, that the harm would be relatively mild. Further investigative work is normally required to clarify the risk and to determine the potential liability to site owner/occupier. Some remediation works may be required in the longer term.

Low risk

It is possible that harm could arise to a designated receptor from identified hazard, but it is likely at worst, that this harm if realised would normally be mild. It is unlikely that the site owner/or occupier would face substantial liabilities from such a risk. Further investigative work (which is likely to be limited) to clarify the risk may be required. Any subsequent remediation works are likely to be relatively limited.

Very low risk

It is a low possibility that harm could arise to a designated receptor, but it is likely at worst, that this harm if realised would normally be mild or minor.

No potential risk

There is no potential risk if no pollution linkage has been established.

3. GQRA METHODOLOGIES

In order to assess the significance of the chemical concentrations recorded, generic assessment criteria (GAC) must be selected. The GAC are screening concentrations which are used initially for direct comparison to the measured site concentrations.

The GAC are defined based on the critical receptors identified at the site. Receptors are considered in relation to:

- Human health receptors (*e.g.*, site users);
- The water environment (*e.g.*, groundwater and surface water).

Potential risks to human health are considered primarily using measured concentrations of chemicals in soil. Potential risks to the water environment are considered primarily using soil leachate and groundwater concentrations as indicative of the potentially mobile fraction of any soil impact.

Additional receptors may be relevant dependent on the site *e.g.*, flora/fauna, water supply pipes, buried concrete.

3.1. Human Health Assessment

3.1.1. Initial Screening Assessment

In accordance with current UK guidance on legislation including Part 2A of the Environmental Protection Act 1990 and based on the principles of risk assessment, Ramboll Environ (REH) has derived generic assessment criteria (GAC) for interpretation of soil and groundwater chemical analysis. The Ramboll Environ GAC are considered to be threshold based screening concentrations, at which a significant risk is not considered to be present to the relevant receptors.

The Ramboll Environ REH GAC for soil assessment are based on the generic scenarios outlined in the Contaminated Land Exposure Assessment (CLEA) methodology and guidance documents (incorporating Science Reports SC050021/SR2 (January 2009), SR3 (January 2009), SR4 (September 2009) and the SGV reports (2009)). The generic scenarios include inhalation, ingestion, dermal contact of soil and dust as pathways for commercial and residential scenarios; as well as ingestion of homegrown produce for residential with gardens scenario. In addition, REH GAC have also been derived for the two Public Open Space land uses defined in C4SL guidance (outlined below).

The GAC have been calculated by use of two proprietary risk assessment models (CLEA Version 1.071 and the American Society for Testing Materials Risk Based Corrective Action RBCA Tool Kit Version 2.6 for Chemical Releases) which have been altered, where necessary, to reflect the current UK approach to human health risk assessment as set out in the Contaminated Land Report (CLR) 11 and the CLEA guidance documents. The physiochemical data has been taken from or derived using the methodology detailed in SR7 (November 2008) and SGV reports (2009), where feasible. The toxicology data has been taken from the current published EA toxicology documents. We have referred to all current publications and guidance issued up until 1st May 2016.

Reference has been made to the Defra-funded research project (SP1010), which developed a methodology to derive Category 4 Screening Levels (C4SLs) for six contaminants (benzo-a-pyrene, cadmium, arsenic, benzene, hexavalent chromium and lead). SP1010 provides technical tools and advice to be developed to help regulators and others to conform to the requirements of revised Part 2A Statutory Guidance. The C4SLs are therefore less conservative than GAC developed in accordance with published CLEA guidance as they describe a low risk as opposed to minimal risk scenario. However,

consistent with the developed GAC, sites below the C4SLs are within Category 4 (lowest risk category) and therefore considered suitable for use.

Defra's SP1010 Policy Companion document (DEFRA, Dec 2014) states that where a C4SL value has been derived for a contaminant where a Soil Guideline Value (as published by the EA 2009) exists, it is anticipated that risk assessors will use the C4SL value in line with Part 2A Statutory Guidance. In the absence of a suitable C4SL, risk assessors should identify and select appropriate GAC in accordance with established good practice. On this basis, Ramboll Environ has adopted the use of C4SLs however minimal risk assumptions have been applied in-house REH GAC for other contaminants of concern within our screening assessments.

The C4SLs for the six compounds published, are based on a sandy loam soil with 6% soil organic matter (SOM). The 6% SOM and sandy loam soil type is not considered by Ramboll Environ to be realistic of 'typical' UK soil conditions, and EA guidance ('Using Soil Guideline Values' EA, 2009) states that at 6% SOM, GAC may not be sufficiently protective (i.e. the values are too high to be sufficiently certain that they describe land where there is no risk to human health or the risk is negligible). For the Ramboll Environ GAC, all the C4SL inputs have been used apart from the SOM and soil type, which were amended to 1% and sand; thereby ensuring a suitably conservative Ramboll Environ GAC appropriate for most soils and Made Ground encountered in the UK. It is noted that none of the screening criteria used in the UK, including the C4SLs, have a statutory basis.

Ramboll Environ also attended the Land Quality Management and Chartered Institute of Environmental Health workshop for the collaborative development of 'Suitable 4 Use Levels' (S4ULs) and reference has been made to their publication 'The LQM/CIEH S4ULs for Human Health Risk Assessment, 2015'.

Review of additional UK organisation guidance including Contaminated Land: Applications in Real Environments (CL:AIRE) and partners GAC, including addendums up until 10 April 2012 has also been made. Soil Guideline Values (EA/DEFRA, 2009) may also be referred to if relevant. Finally, where necessary, other published sources of (non-UK) information, such as the RBCA V2.6 database has also been reviewed.

Contaminant concentrations below the adopted GAC are not considered to present a significant risk to identified receptors and therefore are not considered to warrant further study. Contaminants which are recorded at concentrations above their respective GAC are considered to present a potential risk to identified receptors and resultantly these determinants are subject to further assessment.

3.1.2. Contaminant Distribution Assessment

Concentrations above the GAC are considered further in relation to vertical and lateral distribution across the site and through statistical analysis, where appropriate. This analysis is used to define 'averaging areas' within which contamination concentrations and distribution are considered likely to be similar.

For each averaging area, where appropriate, statistical analysis is then used to calculate a 'representative' concentration for each contaminant within that area and identify possible outliers of the underlying distribution of contaminant concentrations. This analysis is completed in accordance with CIEH 2008 guidance.

The initial statistical tests are used to calculate the 95% probability that the true population mean falls below the critical concentration (GAC). In practise, this involves comparing the 95th Upper Confidence Limit of the true population mean with the GAC. The Maximum Value test is then used to identify whether the maximum concentration is likely to lie outside of the assumed distribution trend and as such would represent an outlier of the general population of data across the site. Outliers above the GAC may represent localised contaminant hotspots and require further consideration.

Constituent non-detects are conservatively assigned a value equal to the reported analytical laboratory limit of detection. Any identified true outliers are excluded from the datasets used in calculation of the 95%UCL value.

3.2. Assessment for the Water Environment

Assessment of risks to water resources is completed in general accordance with guidance provided in the Environment Agency 2013, Groundwater Protection Principles and Practice (GP3) for England and Wales and with reference to SEPA guidance WAT-PS-10-01 in Scotland.

Generic assessment criteria for waters must be selected to assess potential risks to the identified environmental receptors.

In the absence of relevant published water assessment criteria, the potential risk to human health from contaminated surface and groundwater and the potential risk to the aquatic environment from entry of pollutants (either directly or via a groundwater pathway) has been assessed using commonly accepted UK guidelines including the Water Supply (Water Quality) (England) Regulations 2000 (known as the Drinking Water Standards, or DWS) and the Environmental Quality Standards (EQS) defined in European legislation such as the Water Framework Directive (WFD) (2000/60/EC).

Minimum reporting values are also considered for hazardous substances for assessment of risks to groundwater resources in order to comply with the requirements of the guidance to 'prevent' input of hazardous substances to groundwater.

4. GROUND GAS RISK ASSESSMENT

Ground gas risk is characterised using guidance provided in the following:

- CIRIA C665, 2007. Assessing risks posed by hazardous ground gases to buildings. (Supersedes CIRIA 659).
- NHBC / RSK, 2007. Guidance on evaluation of development proposals on sites where methane and carbon dioxide are present. Report Ed 4.
- BS8485: 2015 Code of practice for the characterization and remediation from ground gas in affected developments.
- BS8576:2013. Guidance on investigations for ground gas – Permanent gases and Volatile Organic Compounds (VOCs)

The risk posed by a gas regime is assessed initially by calculating a Gas Screening Value using a combination of the gas flow rate and recorded concentrations of carbon dioxide and methane. This Gas Screening Value is then used in combination with the maximum recorded gas concentrations to determine the site's Characteristic Situation (CIRIA 665 – all site uses except low rise residential) or Traffic Light Classification (NHBC/RSK 2007 low rise residential sites only). Table A below outlines the method for defining the Characteristic Situation as detailed in CIRIA 665 and Table B outlines the method for defining the Traffic Light classification as detailed in NHBC/RSK 2007.

Table A: Proposed method for classifying gassing sites (after CIRIA C665 2007)

Characteristic Situation	Risk classification	Gas screening value of CH ₄ or CO ₂ (l/hr) ^a	Additional limiting factors	Typical source of generation
1	Very low risk	<0.07	Typically methane ≤ 1% and/or carbon dioxide ≤ 5%. Otherwise consider increase to Situation 2	Natural soils with low organic content. "Typical" Made Ground
2	Low risk	<0.7	Borehole air flow rate not to exceed 70l/hr. Otherwise consider increase to Characteristic Situation 3	Natural soil, high peat/organic content. "Typical" Made Ground
3	Moderate risk	<3.5	-	Old landfill, inert waste, mineworking flooded
4	Moderate to high risk	<15	Quantitative risk assessment required to evaluate scope of protective measures	Mineworking -susceptible to flooding, completed landfill, inert waste (WMP 26B criteria)
5	High risk	<70	-	Mineworking unflooded inactive with shallow workings near surface
6	Very high risk	>70	-	Recent landfill site

^a Gas screening value = gas concentration (%) x measured borehole flow rate (l/hr)

Table B: Proposed method for classifying gassing sites (after NHBC/RSK 2007)

Traffic Light	Methane ¹		Carbon Dioxide ¹	
	Typical Maximum Concentration ⁵ (%v/v)	Gas Screening Value (GSV) ^{2,4,6} litres per hour	Typical Maximum Concentration ⁵	Gas Screening Value (GSV) ^{2,3,4,5}

			(%v/v)	litres per hour
Green				
Amber 1	1	0.16	5	0.78
Amber 2	5	0.63	10	1.56
Red	20	1.56	30	3.13

The CIRIA, NHBC and BS8485 guidance documents are then used to determine requirements for gas protection measures based on the site classification.

5. WATER SUPPLY PIPES

The assessment has been completed in accordance with the current UK guidance:

- Water UK. Jan 2014. Contaminated Land Assessment Guidance.
- UKWIR UK Water Industry Research Ltd, 2010. Guidance for Selection of Water Supply Pipes to be used in Brownfield Sites.

This guidance provides threshold concentrations for different pipe material for various chemical groups.

The pipeline materials considered by the guidance are PE, PVC, wrapped steel, wrapped ductile iron or copper pipe and barrier pipe. PE and PVC are assessed using threshold concentrations for various chemical groups including volatile organic compounds (VOC) with tentatively identified compounds (TICs), semi-volatile organic compounds (SVOC) with TICs, and mineral oils. Wrapped steel, wrapped ductile iron and copper pipe are assessed using corrosive properties.

Regional water companies may have adopted additional more stringent thresholds which they apply locally, thus consultation with the water authority must always be completed prior to final determination of water supply pipe materials.

6. WASTE CLASSIFICATION

The main steps in classifying waste are:

1. Is it really a waste or can it be reused, recycled or recovered?
2. If the material is not to be utilised in some way and it is waste then classify to ascertain if hazardous or non-hazardous. In order to do this, guidance regarding the definition and classification of hazardous waste is utilised, the two main documents being EA, 2015 'Technical Guidance WM3: Waste Classification - Guidance on the classification and assessment of waste' and the European Waste Catalogue (EWC 2002).
3. Use the results of this initial waste classification to follow one of the following routes:

Hazardous			Non-Hazardous		
Pre-treat the waste.			Thought likely to be inert: (e.g. insoluble and inorganic in nature)	Thought unlikely to be inert: (e.g. may contain peat or other high organic content material)	
Complete WAC (Waste Acceptance Criteria) testing to determine class of landfill it can go to or any requirement for further pre-treatment if WAC fails.			Complete WAC test to determine class of landfill it can be disposed to		-
Pass stable non-reactive hazardous WAC: dispose of at SNRHW landfill.	Pass hazardous WAC: dispose of at hazardous landfill.	Fail: further remedial action required	Pass: dispose of at inert landfill	Fail: dispose of at non-hazardous landfill	Dispose to non-hazardous landfill (no WAC testing required by WM3).

The landfill regulations (Environment Agency, 2011 Treatment of Waste for Landfill) prescribe that hazardous waste requires pre-treatment prior to disposal to landfill. This may include physical sorting at the point of production on site, by sorting of waste soils into separate stockpiles of eg topsoil, made ground and natural gravels.

6.1. Methodology

In terms of the EWC, the soil to be excavated from this site for disposal is classed as 'Soil and Stones containing Dangerous Substances' (EWC Code 170503) or 'Soil and Stones other than those mentioned in EWC Code 170503' (EWC Code 170504). As such it is what is known as a 'Mirror Entry waste' and needs to be assessed against Threshold Levels for certain dangerous substances in order to confirm whether it needs to be classified as hazardous (170503) or non-hazardous (170504).

Data from site soil chemical testing have been assessed to classify the site soils. The assessment has been undertaken using HazWasteOnline TM, a web-based tool for classifying waste. The software utilises Environment Agency guidance and European regulations to classify samples in line with current requirements.

The assessment provided in this report fulfils the requirement of step 2 above, and allows classification of the site soils and hazardous or non-hazardous.

Asbestos: The Hazardous Waste (England and Wales) Regulations 2005 requires that any waste having an asbestos content greater than 0.1% weight/weight (w/w) be classified as Hazardous Waste. Any waste with an asbestos content of less than 0.1% w/w can be classified as non-hazardous waste, unless there are other contaminants present which would make the waste hazardous.

Where fibrous asbestos is present at concentrations greater than 0.001%, these can be considered to pose a risk to human health and must be dealt with as hazardous soils for disposal purposes.

Where the asbestos is deemed to be of a fibrous nature the Health and Safety Executive (HSE) require that the handling of the material is undertaken by a suitably licensed company. The Carriage of Dangerous Goods (etc.) Regulations 2009 (CDG2009) applies in this instance.