APPENDIX C: ENVIRONMENTAL RISK ASSESSMENT METHODOLOGY AND TERMINOLOGY

GroundSolve Ltd
Consulting Geotechnical Engineers

Environmental Risk Assessment Methodology & Terminology

LEGISLATION OVERVIEW

This report includes hazard identification and environmental risk assessment in line with the risk-based methods referred to in relevant UK legislation and guidance. Government environmental policy is based upon a "suitable for use approach," which is relevant to both the current use of land and also to any proposed future use. The contaminated land regime is the statutory regime for remediation of contaminated land that causes an unacceptable level of risk and is set out in Part 2A of the Environmental Protection Act 1990 ("EPA 1990"). The main objective of introducing the Part IIA regime is to provide an improved system for the identification and remediation of land where contamination is causing unacceptable risks to human health, or the wider environment given the current use and circumstances of the land. Part IIA provides a statutory definition of contaminated land under Section 78A(2) as:

"any land which appears to the Local Authority in whose area 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 controlled waters is being, or is likely to be, caused."

In order to assist in establishing if there is a "significant possibility of significant harm" there must be a "contaminant linkage" for potential harm to exist. That means there must be a source(s) of contamination, sensitive receptors present and a connection or pathway between the two. This combination of contaminant-pathway-receptor is termed a "contaminant linkage or CPR linkage."

Part IIA of The Environmental Protection Act 1990 is supported by a substantial quantity of guidance and other Regulations. Key implementing legislation of the Part 2A regime includes the Contaminated Land (England) Regulations 2006 (SI 2006/1380) as amended by the overarching legislation for the contaminated land regime, which implements the provisions of Part IIA of the Environmental Protection Act 1990 (as inserted by section 57 of the Environment Act 1995), came into force on 14th July 2000 together with recent amended regulations: Contaminated Land (England) (Amendment) Regulations 2012 (SI 2012/263). Revised Contaminated Land Statutory Guidance was published by DEFRA in April 2012. Part IIA defines the duties of Local Authorities in dealing with it. Part IIA places contaminated land responsibility as a part of planning and redevelopment process rather than Local Authority direct action except in situations of very high pollution risk.

In the planning process guidance is provided by National Planning Policy Framework (NPPF) of July 2018 which requires that a site which has been developed shall not be capable of being determined "contaminated land" under Part IIA. In practice, Planning Authorities require sites being developed to have a lower level of risk post development than the higher level of risk that is required in order to determine a site as being contaminated in accordance with Part IIA. This is to ensure that there is a suitable zone of safety below the level for Part IIA determination and prevent

recently developed sites becoming reclassified as contaminated land if there are future legislative or technical changes (e.g., a substance is subsequently found to be more toxic than previously assessed this increases its hazard).

The criteria for assessing concentrations of contaminants and hence determining whether a site represents a hazard are based on a range of techniques, models and guidance. Within this context it is relevant to note that Government objectives are:

a) to identify and remove unacceptable risks to human health and the environment;

b) to seek to bring damaged land back into beneficial use;

c) to seek to ensure that the cost burdens faced by individuals, companies and society as a whole are proportionate, manageable and economically sustainable.

These three objectives underlie the "suitable for use" approach to risk management and remediation of contaminated land. The "suitable for use" approach focuses on the risks caused by land contamination. The approach recognises that the risks presented by any given level of contamination will vary greatly according to the use of the land and a wide range of other factors, such as the underlying geology of the site. Risks therefore should be assessed on a site-by-site basis.

The "suitable for use" approach then consists of three elements:

a) ensuring that land is suitable for its current use - in other words, identifying any land where contamination is causing unacceptable risks to human health and the environment, assessed on the basis of the current use and circumstances of the land, and returning such land to a condition where such risks no longer arise ("remediating" the land); the contaminated land regime provides the regulatory mechanisms to achieve this;

b) ensuring that land is made suitable for any new use, as planning permission is given for that new use - in other words, assessing the potential risks from contamination, on the basis of the proposed future use and circumstances, before official permission is given for the development and, where necessary to avoid unacceptable risks to human health and the environment, remediating the land before the new use commences; this is the role of the town and country planning and building control regimes; and

c) limiting requirements for remediation to the work necessary to prevent unacceptable risks to human health or the environment in relation to the current use or future use of the land for which planning permission is being sought - in other words, recognising that the risks from contaminated land can be satisfactory assessed only in the context of specific uses of the land (whether current or proposed), and that any attempt to guess what might be needed at some time in the future for other uses is likely to result either in premature work (thereby running the risk of distorting social, economic and environmental priorities) or in unnecessary work (thereby wasting resources).

The mere presence of contaminants does not therefore necessarily warrant action, and consideration must be given to the scale of risk involved for the use that the site has and will have in the future.

OVERALL METHODOLOGY

The work presented in this report has been carried out in general accordance with recognised best practice as detailed in guidance documents such as in the EA online guidance: Land Contamination: Risk Management (LCRM) (Environment Agency, 2020), and BS10175:2011+A2 2017. Important aspects of the risk assessment process are transparency and justification. The particular rationale behind the risk assessments presented is given in this appendix.

The first stage of a two-staged investigation and assessment of a site is the Preliminary Investigation (BS 10175:2011), often referred to as the Phase 1 Study, comprising desk study and walk-over survey, which culminates in the Preliminary Risk Assessment. A preliminary conceptual site model (CSM) is developed which identifies potential geotechnical and geo-environmental hazards and the qualitative degree of risk associated with them. From the geo-environmental perspective, the Hazard Identification process uses professional judgement to evaluate all the hazards in terms of potential contaminant linkages (of contaminant source-pathway-receptor). Potential contaminant linkages are potentially unacceptable risks in terms of the current contaminated land regime legal framework and require either remediation or further assessment. These are normally addressed via intrusive ground investigation and generic risk assessment.

The second stage is the Ground Investigation, Generic Risk Assessment and Geotechnical Interpretation. This represents the further assessment mentioned above. The scope of the Ground Investigation is based on the findings of the Preliminary Risk Assessment and is designed to reduce uncertainty in the geotechnical and geo-environmental hazard identification. The Ground Investigation comprises fieldwork, laboratory testing and usually also on-site monitoring. The Ground Investigation may include the Exploratory, Main and Supplementary Investigations described in BS 10175:2011+A2 2017. The results of the Ground Investigation reduces uncertainty in the geotechnical and geo-environmental risks. Depending on the findings more detailed investigations or assessments may be required.

PRELIMINARY RISK ASSESSMENT

Current practice recommends that the determination of potential liabilities that could arise from land contamination be carried out using the process of risk assessment, whereby "risk" is defined as:

> "(a) The probability, or frequency, or occurrence of a defined hazard; and
> (b) The magnitude (including the seriousness) of the consequences."

The UK's approach to the assessment of environmental risk is set out in by the Department of the Environment Transport and the Regions (2000) publication "A Guide to Risk Assessment and Risk Management for Environmental Protection" (also called Greenleaves II). This established an iterative, systematic staged process which comprises:

a) Hazard identification;
b) Hazard assessment;
c) Risk estimation;
d) Risk evaluation;
e) Risk assessment;

At each stage during the development process, the above steps are repeated as more detailed information becomes available for the site.

For an environmental risk to be present, all three of the following elements must be present:

- Source/Contaminant: hazardous substance that has the potential to cause adverse impacts;
- Receptor: target that may be affected by contamination: examples include human occupants/users of site, water resources (rivers or groundwater), or structures;
- Pathway: a viable route whereby a hazardous substance may come into contact with the receptor.

The absence of one or more of each component (contaminant, pathway, receptor) would prevent a contaminant linkage being established and there would be no significant environmental risk.

The identification of potential contaminant linkages is based on a Conceptual Model of the site, which is subject to continual refinement as additional data becomes available. As part of a Preliminary Risk Assessment (Desk Study and site walk over) a Preliminary Conceptual Site Model (PCSM) is formed. Based on the PCSM, potential contaminant linkages can be assessed. If the PCSM and hazard assessment indicate that a contaminant linkage is not of significance then no further assessment or action is required for this linkage. For each significant and potential linkage, a risk assessment is carried out. The linkages which potentially pose significant risks may require a variety of responses ranging from immediate remedial action or risk management or, more commonly, further investigation and risk assessment. This next stage is termed a Phase II Main Site Investigation and should provide additional data to allow refinement of the Conceptual Site Model and assess the level of risk from each contaminant linkage.

Definition of Risk Assessment Terminology

CIRIA Report C552, Contaminated Land Risk Assessment A Guide to Good Practice, 2001 sets out a methodology for estimating risk. The methodology for risk evaluation is a qualitative method for interpreting the output for the risk estimation stage of the assessment. It involves the classification of the:

- Magnitude of the potential consequence (severity) of risk occurring.
- Magnitude of the probability (likelihood) of the risk occurring.

The classification of consequence and probability are set out in table B1 and B2 below:

Table B1 Classification of Consequence

Classification	Definition	Examples
Severe (Sv)	Short term (acute) risk to human health likely to result in "significant harm" as defined by the Environment protection Act 1990, Part IIA. Short term risk of pollution of controlled waters. Catastrophic damage to buildings / property. A short-term risk to a particular ecosystem, or organism forming part of such ecosystem	High concentrations of cyanide on the surface of an informal recreation area Major spillage of contaminants from site into controlled water. Explosion causing building collapse (can also equate to a short-term human health risk if buildings are occupied.)
Medium (Md)	Chronic damage to Human Health ("significant harm"). Pollution of controlled waters. A significant change in a particular ecosystem, organism forming part such ecosystem.	Concentrations of contaminants from site exceeding generic or site-specific screening criteria. Leaching of contaminants into a major or minor aquifer. Death of species within a designated nature reserve.
Mild (Mi)	Pollution of non-sensitive water resources. Significant damage to crops, buildings, structures, and services. Damage to sensitive buildings / structures / services or the environment.	Pollution of non-classified groundwater. Damage to building, rendering it unsafe to occupy (e.g., foundation damage resulting in instability)
Minor (Mr)	Harm, although not necessarily significant harm, which may result in a financial loss, or expenditure to resolve. Non-permanent health effects to human health (easily prevented by measures such as protective clothing etc). Easily repairable effects of damage to buildings, structures, and services.	The presence of contaminants at such concentrations that protective equipment is required during site work. The loss of plants in a landscaping scheme. Discolouration of concrete.

The classification of consequence does not take into account the probability of the consequence being realised. Therefore there may be more than one consequence for a particular pollutant linkage. Both a severe and medium classification can result in death. Severe relates to short term (acute) risk while medium relates to long term (chronic) risk. Mild relates to significant harm but to

less sensitive receptors. Minor classification relates to harm which is not significant but could have a financial cost.

Table B2 Classification of Probability

Classification	Definition
High likelihood (Hi)	There is a pollutant linkage and an event that either appears very likely in the short term and almost inevitable in the long term, or there is evidence at the receptor or harm or pollution.
Likely (Li)	There is a 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 (Lw)	There is a pollutant linkage and circumstances are possible under which an event could occur. However, it is by no means certain that even over a longer period such event would take place and is less likely in the short term.
Unlikely (Ul)	There is a pollutant linkage, but circumstances are such that it is improbable that an event would occur even in the very long term.

The classification gives a guide as to the severity and consequence of identified risk when compared with other risk presented on the site. It should be noted that if a risk is identified it cannot be classified as "no risk" but as "very low risk". Differing stakeholders may have a different view on the acceptability of a risk.

Once the consequence and probability have been classified these can be compared using a matrix (**Table B3**) to identify an overall risk category. These categories and the actions required are categorised in **Table B4**.

Table B3 Risk Evaluation Matrix

		Consequence			
		Severe (Sv)	Medium (Md)	Mild (Mi)	Minor (Mr)
Probability	High likelihood (Hi)	Very High Risk (VH)	High Risk (H)	Moderate Risk (M)	Mod/Low Risk (M/L)
	Likely (Li)	High Risk (H)	Moderate Risk (M)	Mod/Low Risk (M/L)	Low Risk (L)
	Low likelihood (Lw)	Moderate Risk (M)	Mod/Low Risk (M/L)	Low Risk (L)	Very Low Risk (VL)
	Unlikely (Ul)	Mod/Low Risk (M/L)	Low Risk (L)	Very Low Risk (VL)	Very Low Risk (VL)

Table B4 Risk Categorisations

Very High Risk (VH)	There is a high probability that severe harm could arise to a designated receptor from an identified hazard, OR there is evidence that severe harm to a designated receptor is currently happening. This risk, if realised, is likely to result in a substantial liability. Urgent investigation (if not undertaken already) and remediation are likely to be required.
High Risk (H)	Harm is likely to arise to a designated receptor from an identified hazard. Realisation of the risk is likely to present a substantial liability. Urgent investigation (if not undertaken already) is required and remedial works may be necessary in the short term and are likely over the longer-term.
Moderate Risk (M)	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, or if any harm were to occur it is more likely that the harm would be relatively mild. Investigation (if not already undertaken) is normally required to clarify the risk and to determine the potential liability. Some remedial works may be required in the longer-term.
Low Risk (L)	It is possible that harm could arise to a designated receptor from an identified hazard, but it is likely that this harm, if realised, would at worst normally be mild.
Very Low Risk (VL)	There is a low possibility that harm could arise to a receptor. In the event of such harm being realised it is not likely to be severe.

GENERIC QIANTITATIVE RISK ASSESSMENT

In the following sections the current UK guidance on risks to the following receptors are discussed: human health, plant life and controlled waters

Human Health

The overall methodology for assessing the risk to human health from potential contaminants in soil is set out in the Environment Agency's guidance "Using Soil Guideline Values" SC050021/SGV Introduction, March 2009 and using the CLEA 1.06 model software (and CLEA 1.071 for nickel). The generic assessment criteria are in accordance with the following:

- Science Report SC050021/SR2: Human health toxicological assessment of contaminants in soil;
- Science Report SC050021/SR3: Updated technical background to the CLEA model;
- Science Report SC050021/SR4: CLEA Software (Version 1.071, 2014) & Handbook;
- Toxicological reports and SGV technical notes;
- Toxicological data published by LQM/CIEH (2009) and CL:AIRE/EIC/AGS (2009);
- DEFRA Development of Category 4 Screening Levels for assessment of land affected by contamination - SP1010 (December 2013);
- LQM/CIEH Suitable 4 Use Levels (S4ULs) for Human Health Risk Assessment; and,
- Toxicology review published by the European Food Safety Authority for nickel (2015).

In March 2014 six 'proposed' Category 4 Screening Levels (pC4SL) were issued by Defra. These screening values are considered to be within Category 4 as defined in the Contaminated Land Statutory Guidance and indicate safe levels for new developments passing through the planning system. The SGV for lead has been withdrawn, and the pC4SL for lead has been derived using current best practice. In January 2015 LQM/CIEH published S4ULs for 89 contaminants in accordance with the C4SL methodology.

Note that groundwater contamination may pose a risk to human health but that there are no relevant generic assessment criteria available for comparison. GroundSolve has derived our own assessment criteria for this.

Phytotoxic Risks

Generic assessment of phytotoxicity is by comparison with guideline values presented in the British Standard for Topsoil and the MAFF document "Code of Good agricultural practice for the protection of soil", October 1998. This is in accordance with LCRM's reference to DEFRA notice CLAN 4/04.

Controlled Waters

Risks to controlled waters (groundwater and surface waters) from contaminants are assessed in accordance with the EA documents "The Environment Agency's Approach to Groundwater Protection" (2017) and Remedial Targets Methodology (RTM, 2006). Pollutant inputs from

contaminated land sites are considered as passive inputs under the European Water Framework Directive (2000/60/EC) (WFD) and its daughter Directives, and as such are regulated under the Environment Agency's 'limit' pollution objective. Acceptable water quality targets (WQT) are defined for protection of human health (based on Drinking Water Standards (DWS)) and for protection of aquatic ecosystems (Environmental Quality Standards (EQS)). The risk posed to controlled waters from total soil concentrations cannot be directly assessed. The risk is assessed either by comparison of results of leachate tests carried out on soil samples, or from the direct testing of samples of groundwater to screening criteria. Leachate testing generally forms a conservative assessment and is not appropriate for organic contaminants.

CURRENT GUIDANCE ON INTERPRETATION OF CHEMICAL ANALYSIS OF SOILS

Contaminated land is defined under law through Part IIA of the Environmental Protection Act 1990, implemented through Section 57 of the Environment Act 1995. This supports a 'suitable for use' based approach to the risk assessment of potentially contaminated land. The site-specific risk assessment is based upon assessment of plausible contaminant linkages, referred to as the contaminant-pathway- receptor model, based upon the current or proposed use of the site.

Before undertaking a risk assessment, a conceptual site model is devised in order to identify the potential contaminants, pathways and receptors. The individual contaminants, pathways and receptors then need to be further investigated in order to refine the initial assessment and risk assessment undertaken.

In March 2002, the Department for Environment, Food and Rural Affairs (DEFRA) and the Environment Agency published the Contaminated Land Exposure Assessment (CLEA) Model and a series of related reports. These were designed to provide a scientifically based framework for the assessment of chronic risks to human health from contaminated land. These reports (CLR7-10) together with associated "SGV" documents were withdrawn and the following documents have been published as revised guidance to the CLEA assessment:

- Environment Agency : 2008: Using Soil Guideline Values SC050021/SGV Introduction, March 2008.
- Environment Agency : 2008: Science Report SC050021/SR2: Human health toxicological assessment of contaminants in soil.
- Environment Agency : 2008: Science Report SC050021/SR3: Updated technical background to the CLEA model.
- Environment Agency : 2008 : Compilation of Data for Priority Organic Contaminants for Derivation of Soil Guideline Values Science report SC050021/SR7
- Environment Agency : Science Report SC050021/SR4: CLEA Software (Version 1.071, 2015) & Handbook.
- DEFRA Development of Category 4 Screening Levels for assessment of land affected by contamination - SP1010 (December 2013).
- LQM/CIEH Suitable 4 Use Levels for Human Health Risk Assessment.

Additional guidance on statistical assessment replacing CLR 7 is partly provided in:

- CL:AIRE: 2009: Guidance on Comparing Data With a Critical Concentration

A different approach to the statistical appraisal of data is required depending on whether the assessment of risk is to assess whether land is Contaminated Land in accordance with regulations, or whether the assessment is to assess whether the site is suitable for new development in according with Planning guidance. This is discussed further in CL:AIRE: 2009 "Guidance on Comparing Data With a Critical Concentration".

The introduction of the Contaminated Land (England) (Amendment) Regulations 2012 and Contaminated Land Statutory Guidance (DEFRA, 2012) reassessed the CLEA Model and the derived SGVs (and associated GACs calculated using the model). This re-assessment concluded that the SGVs/GACs were conservative screening criteria for determining the suitability of soil with regard to the risk to human health under the planning regime and defined a new upper limit for planning purposes which is the boundary between the new Category 3 and 4. In March and September 2014 DEFRA issued guidance on these new Category 4 Screening Levels (C4SL) and these are discussed further below.

Soil Guideline Values

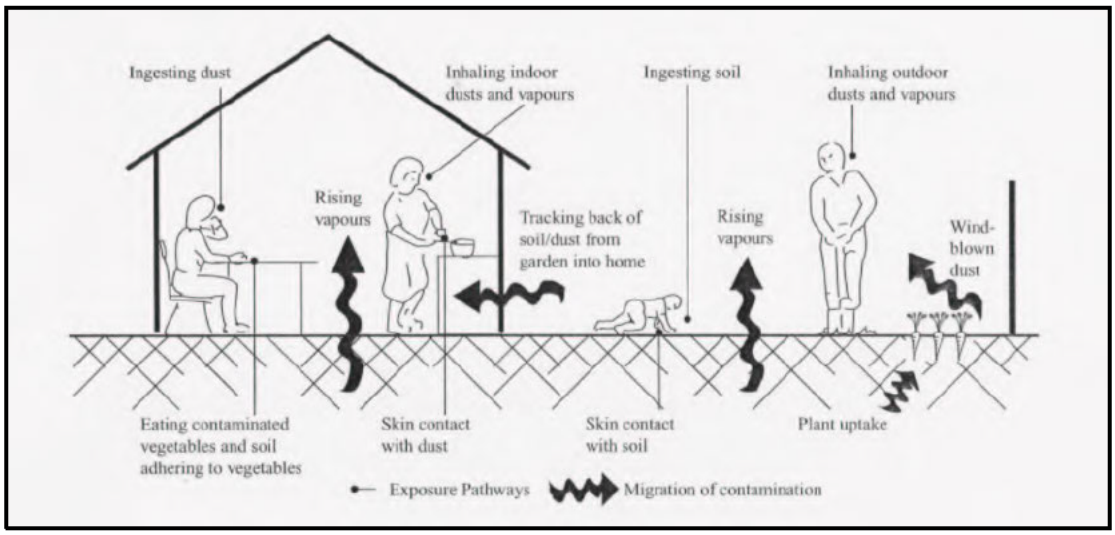
A program for the derivation of SGVs based on the above guidance is provided by the Environment Agency and is entitled "CLEA Software Version 1.06". These reports, together with supporting toxicology reviews ("Tox" or Supplementary Information Reports) for individual substances (which will be gradually updated), Soil Guideline Value Reports and other guidance referred to in the above documents, provide guidance and the scientific basis for assessing the risk to human health from potential contaminants. Soil Guideline Value Reports (SGV Reports) have been published for a number of contaminants and these are published on the Environment Agency website. Eventually the reports will include SGVs for:

- heavy metals and other inorganic compounds: arsenic, cadmium, chromium, cyanide, lead (now withdrawn), mercury nickel (now withdrawn), and selenium;
- benzene, ethylbenzene, toluene, and xylenes;
- phenol;
- dioxins and dioxin-like polychlorinated biphenyls (PCBs);
- polycyclic aromatic hydrocarbons (PAHs) – 11 substances.

In September 2015, CLEA was re-issued as 'CLEA Version 1.071'. Currently, the software has been used to produce an in-house GAC for nickel, following with withdrawal of the SGV.

In addition, CIEH through LQM and the EIC have published generic assessment criteria (GACs) for a wide variety of other parameters including metals, hydrocarbons, chlorinated aliphatic compounds, PAHs and explosive substances for three standard land uses. These have been produced to supplement the Environment Agency guidance. These GACs will be replaced by SGVs when or if the Environment Agency publishes any more SGVs.

The CLEA model has been developed to calculate an estimated tolerable daily soil intake (TDSI) for site users given a set 'default' exposure pathways. Ten human exposure pathways are covered in the CLEA model as presented below:



- Ingestion:
  - ingestion of outdoor soil;
  - ingestion of indoor dust;
  - ingestion of home-grown vegetables;
  - ingestion of soil attached to home grown vegetables.

- Dermal Contact:
  - dermal contact with outdoor soil;
  - dermal contact with indoor dust.

- Inhalation:
  - inhalation of outdoor dust;
  - inhalation of indoor dust;
  - inhalation of outdoor soil vapour;
  - inhalation of indoor soil vapour.

It should be noted that there are other potential exposure pathways on some sites not included in the CLEA model e.g., certain organic compounds can pass through plastic water pipes into drinking water supply.

The presence and/or significance of each of the above exposure pathways are dependent on the type of land use being considered and the nature of the contaminant under scrutiny. Accordingly, the CLEA model considers for principle 'default' land use types and makes a series of 'default' assumptions with regard to human exposure frequency, duration and critical human target groups for each land use considered:

- residential land use;
- allotments;
- commercial and industrial land use.

The land use categories defined in the CLEA are detailed below.

Residential: This land use category assumes that people live in a variety of dwellings including terraced, detached and semi-detached houses up to two storeys high. The structure of buildings varies. Default parameters for building materials and building design are included in CLEA documents to calculate the relevant multi-layer diffusion coefficients for vapour intrusion and to model indoor vapour intrusion. The CLEA model assumes that regardless of the style of housing the residents will have access to either a private garden or community open space nearby, and that soil tracked into the home will form indoor dust. It allows for the ingestion pathways from home grown vegetables.

Allotments: The CLEA model incorporates an assessment of land provided by local authorities specifically for people to grow fruit and vegetables for their own consumption. Consumption of such fruit and vegetables present several exposure pathways; plants absorb contaminants mainly via water uptake through roots, the contaminants move to edible portions of plants via translocation and contaminated soil particles become trapped in the skin and between leaves. At present the model fails to account for exposure through the consumption of animals, and their products (e.g., eggs), which have been reared on contaminated land.

Commercial/Industrial: Although there are a wide variety of workplaces and work-related activities, the CLEA assessment of this land-use assumes that work occurs in a permanent, three-storey structure, where employees spend most time indoors, conducting office-based or light physical work. The model assumes employees sit outside during breaks for most of the year. Limitations in applying this land-use to different industries is detailed in EA publication "Updated technical background to the CLEA model" (2011). The generic model assumes that the site would not be covered by hard standing. Risk of exposure to contaminants would be clearly less where commercial land is essentially all buildings and hard standing.

Based on the assumptions of each land use and the associated applicable exposure pathways, a 'Soil Guideline Value' (SGV) may be calculated for each contaminant under consideration for a particular land use in order to determine whether certain contaminant soil concentrations pose a significant risk to human health. The primary purpose of the CLEA SGVs are as 'trigger values' – indicators to a risk assessor that soil concentrations below this level require no further assessment as it can be assumed that the soil is suitable for the proposed use. Where soil concentrations occur above the SGV then further assessment of the results is required. The Contaminated Land (England) (Amendment) Regulations 2012 and Contaminated Land Statutory Guidance (DEFRA, 2012) which came into force in early April 2012 provides new clarity on the assessment of risk where soil concentrations exceed the SGV. The guidance introduces a four-stage classification system relating to concentration of contaminants and the assessed risk which indicates appropriate actions. Category 1 and 2 sites are classified as "Contaminated Land" as defined in Part IIA of The Environmental Protection Act (1990). Category 3 and 4 sites are not considered as "Contaminated Land" in accordance with the Act. This can be explained using the figure on the following page.

There are also difficulties in establishing soil concentrations of contaminants beyond which risks from exposure to these contaminants would be 'unacceptable' and that they would lead to "significant possibility of significant harm" as defined in Part IIA of The Environmental Protection Act (1990) and determine that the land is "contaminated." This ultimately requires detailed 'toxicological' information of the health effects of individual contaminants and also a scientific judgement on what constitutes an 'unacceptable' risk. It is for local authorities or the

Environment Agency to determine whether a particular site is contaminated land, and it is for local Planning Authorities to determine whether land affected by contamination can be redeveloped.

Given the SGVs have been derived only for a limited number of contaminants and there was little prospect of further SGVs being published, two professional groupings have produced Generic Assessment Criteria (GACs) in accordance with the CLEA model for a large number of additional contaminants. These GACs were recognised in the new Contaminated Land Statutory Guidance (DEFRA, 2012) and have been produced as follows:

- *LQM/CIEH : 2009 Nathaniel CP, McCaffrey C, Ashmore MH, Cheng NPS GROUP, Gillett A, Ogden R & Scott D : 2009 . The LQM/CIEH Generic Assessment Criteria for Human Health Risk Assessment (2nd edition). Land Quality Press, Nottingham.*
- *CL:AIRE/EIC/AGS: 2009 : Soil Generic Assessment Criteria (GAC) for Human Health Risk Assessment. Contaminated Land: Applications in Real Environments, Environment Industries Commission & Association of Geotechnical and Environmental Specialists. December 2009.*

Category 4 Screening Levels and LQM/CIEH Suitable 4 Use Levels

For new developments progressing through the planning regime, it is desirable that the soil concentrations are within Category 4 where there is a valid contaminant linkage. The upper boundary between Category 4 and 3 is not defined in the guidance. This boundary can also be better defined by carrying out a Detailed Quantified Risk Assessment (DQRA) and this is discussed later in this appendix.

In December 2013 Defra issued the findings of a research project undertaken by CL:AIRE to set out the framework by which potential Category 4 Screening Levels (pC4SL) may be derived. The report was not designed to produce 'final' C4SL as the steering group producing the report believes that final C4SL should be set by a 'relevant authority' (e.g., Defra), the toxicological framework proposed has not been reviewed by the Committee on Toxicity and the document has yet to be subject to peer review.

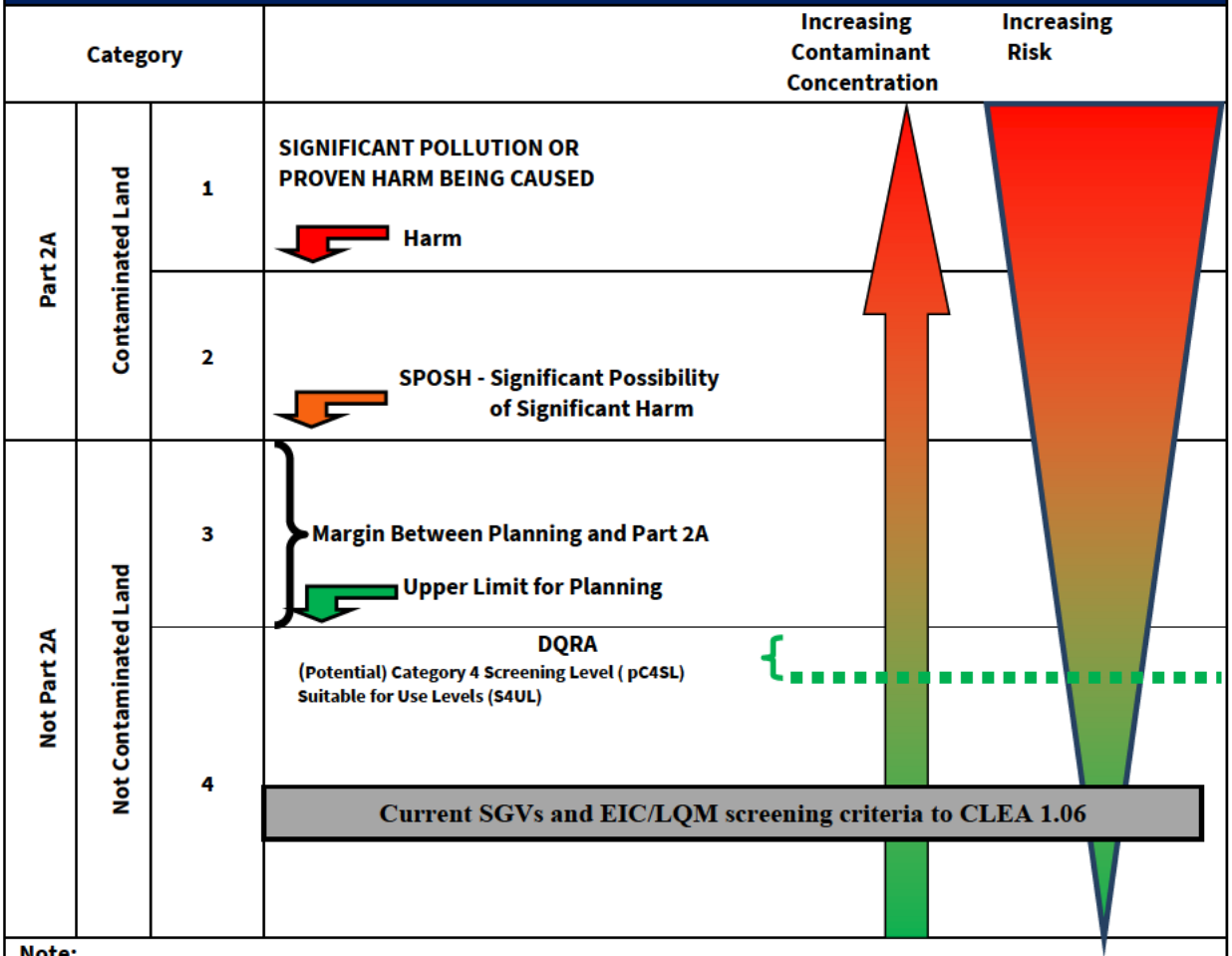
In March 2014, appendices to the main Defra report were published detailing the derivation of pC4SL for 6 contaminants and other appendices regarding a review of the CIEH/CL:AIRE statistics guidance and sensitivity analysis. For each contaminant, a range of pC4SL have been produced relating to modifying toxicological parameters only, modifying exposure parameters only or by modifying both. It should be noted that the pC4SL produced for lead (the SGV was withdrawn in 2011) has undertaken a relatively large toxicological review in relation to modelling blood lead concentrations. pC4SL have been produced for:

- Arsenic;
- Benzene;
- Benzo(a)pyrene (as a surrogate marker for PAHs);
- Cadmium;
- Chromium (VI); and
- Lead

As previously discussed the values were initially published as 'potential' C4SL but have become 'final' following DEFRA having issued a policy decision letter indicating that they are to be used in the planning regime (letter of 3rd September 2014). It is considered that the pC4SL provide a

simple test for deciding whether land is suitable for use without any remediation. The pC4SL represent a new set of screening levels that are more pragmatic (but strongly precautionary) compared to the existing soil guideline values (SGVs and the other GACs calculate in accordance with the existing CLEA methodology). The pC4SL provide cautious estimates of contaminant concentrations in soil that are still considered to present an acceptable level of risk, within the context of Part 2A, by combining information on toxicology, exposure assessment and normal levels of exposure to these contaminants. pC4SL values should not be seen as 'SPOH values.' Exceeding a pC4SL means that further investigation is required, not that the land is necessarily contaminated. In January 2015, LQM published Suitable 4 Use Levels (S4ULs) for a further 89 contaminants using the Defra C4SL methodology. In a similar manner to the pC4SLs, no authoritative review has been undertaken although the approach and quality of the work undertaken is widely accepted as being of high quality.

Relationship Between Contaminant Concentration, Risk and Screening Values



Note:

The vertical scale should not be considered as being linear and will be site and contaminant specific.

- SPOSH concentrations could be 10 to 100 times the SGV/EIC/LQM screening concentration.
- C4SL were issued as 'potential' but have become 'final' following DEFRA having issued a policy decision letter indicating that they are to be used in the planning regime (letter of 3rd September 2014).

Lead:
The SGV for lead was withdrawn in 2011 and is not used in this report. The pC4SL for lead provides a technically robust and conservative assessment tool using significantly updated toxicological modelling in line with current scientific understanding of lead toxicology.

Nickel
The SGV for nickel was withdrawn in 2015 and is not used in this report. In-house GACs for nickel have been produced using the updated toxicological review by the EFSA and the CLEA 1.071 software.

Public Open Space
The Defra report (December 2013) has also introduced exposure scenarios for two other commonly occurring land uses which require assessment (under the planning and Part 2A regimes) on a relatively frequent basis. These exposure scenarios are:

- Public Open Space – Space Near Residential Housing (POS_{resi}); and,
- Public Open Space – Public Park (POS_{park}).

Potential use of pC4SL relating to Public Open Space (POS) require care due to the significant variability in exposure characteristics. For example, POS may include:

- Children's play areas, public parks where children practise sport several times a week and teenagers only once a week;
- Grassed areas adjacent to residential properties which are rarely used;
- Dedicated sports grounds where exposure is only to players and groundworkers; and,
- Nature reserves or open ground with low level activity (for example, dog walking).

Within the Defra report (December 2013) the following exposure scenarios have been modelled as these are considered the most important for potential exposure for the critical receptor i.e., young children:

- Green open space close to housing, including tracking back of soil (POS_{resi}); and
- Park-type scenario where distance is considered sufficient to discount tracking back of soil (POS_{park}).

Detailed Quantified Risk Assessment (DQRA)
SGVs, GACs, pC4SL and S4ULs are based on a number of basic assumptions. There are two main options for developing Site Specific Assessment Criteria (SSAC) by adjusting the CLEA model so that they have greater relevance to the site:

- **Simple adjustment of the generic SGV / C4SL model**. Such adjustment is restricted to the choice of exposure routes selected for the generic land use, building type, soil type and soil organic matter content within the CLEA software.

- **Detailed adjustment.** It may be relevant to make greater modifications to the model due to the specific use of the land in question. This can include modification to any parameter value, including exposure assumptions, building parameters, and the choice and application of fate and transport models. This is equally relevant to site-specific modifications of existing generic land uses, the development of new land uses, and the inclusion of additional exposure pathways. Much of this can be undertaken using the CLEA software. Depending on the complexity of the detailed adjustments required, it may be necessary to use other tools either alone or in conjunction with the CLEA software. Both options should follow established protocols for DQRA and require sufficient justification and supporting information for the adjustments made. Detailed adjustments are likely to require substantially greater technical justification and supporting documentation, especially if modifications are based on information not contained within the SGV framework documents.

The two choices present the risk assessor with three options/decisions:

1. Use a published SGV/GAC/pC4SL/S4UL if it can be demonstrated that the assumptions inherent in the value are appropriate to the site in question. If they are not, proceed to either option 2 or 3 below.

2. Make simple site-specific adjustments to the generic exposure model used to derive the SSAC. Three examples of when this could be appropriate are:

    a. High density residential development with no exposed contaminated soil at surface. It is appropriate in this case to consider the relevance of direct contact pathways and consumption of homegrown produce.

    b. Soil type is significantly different (specifically when soil type is likely to be less protective e.g., made ground) to that assumed in the SGV/GAC/pC4SL/S4UL.

    c. Soil organic matter content is significantly different to that assumed in the derivation of the SGV/GAC/pC4SL/S4UL.

3. If simple adjustments are not sufficient to reflect site conditions, undertake a DQRA. This may be undertaken using the CLEA software or by using an alternative risk assessment methodology that is relevant, appropriate, authoritative, and scientifically based. Changes to toxicological end points may also be considered, although this should only be undertaken by a toxicology expert. In the context of this guidance, simple adjustments of a generic land use scenario for soil type or SOM content for example are not considered sufficient to be classed as a DQRA.

DQRAs should be conducted with the agreement of the local authority (or the Environment Agency) since it is the authority that determines whether land is Contaminated Land or whether Planning Permission for a new development may be granted.

Representative Data

The type, quantity and quality of the available soil data influence the method chosen to obtain a site representative soil concentration that is compared with an SGV/GAC/pC4SL/S4UL in the screening process. The soil data should be representative of the exposure scenario being considered. This can include factors such as:

- Averaging area over which exposure occurs;
- Sample depth; and,
- Heterogeneity of soil.

where the 'averaging area' is defined as:

> *"That area (together with a consideration of depth) of soil to which a receptor is exposed or which otherwise contributes to the creation of hazardous conditions".*

Site investigations take discrete samples from a given area (and to a certain depth). It has to be assumed that these samples are to some degree representative of the contaminant concentration throughout that volume of soil. The critical soil volume (taking into account area and depth) which might be usefully compared with an SGV/GAC/pC4SL/S4UL is a site-specific decision, but a starting point is the generic land use scenarios used in the derivation of the SGV/GAC/pC4SL/S4UL. The critical soil volume depends on two factors:

- Contaminant distribution and vertical profile (bands of highly contaminated material or lateral hot spots should not necessarily be averaged out with more extensive cleaner areas of soil without justification)
- Contribution to average exposure underpinning the SGV. Direct contact exposure pathways depend on the adult or child coming into contact with near-surface soils and the area over which that exposure occurs is usually important (i.e., the averaging area). Vapour pathways are less dependent on surface area, for example vapour intrusion may result from a highly concentrated hot spot beneath a building leading to elevated average indoor air concentrations. For the three standard land uses for which SGVs are derived, relevant considerations are:
- For the standard **residential or allotment land use**, the critical soil volume is the area of an individual garden, communal play area or working plot from the surface to a depth of between 0.50m and 1.00m. This is the ground over which children are most likely to come into contact with soil or from which vegetable and fruit produce will be harvested. In the case of volatile contaminants, it may also be appropriate to consider the volume of soil underneath the footprint of the building although vapour intrusion may be driven by a soil volume much smaller than this if the contaminant source is highly concentrated.
- For the standard **commercial land use**, the critical soil volume has to be decided on a case-by- case basis due to the wide range of possible site layouts. However, for non-volatile contaminants, landscaped and recreational areas around the perimeter of office buildings are likely to be most important. For volatile contaminants, the footprint occupied by the building itself should also be considered.

- For **most exposure pathways**, the contamination is assumed to be at or within one metre of the surface.

The use of averaging areas must be justified on the basis of relevance to the exposure scenario. SGVs are relevant only when the exposure assumptions inherent in them are appropriate for the identified exposure averaging area. Further guidance on critical soil volumes and the consideration of averaging exposure areas can be found in:

- *Secondary model procedure for the development of appropriate soil sampling strategies for land contamination (Environment Agency, 2000);*
- *Guidance on comparing soil contamination data with a critical concentration (CIEH/CL:AIRE, 2009); and*
- *Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination – Appendix I (Defra December 2013, March 2014)*

It is the mean soil concentration for the individual contaminant within an individual averaging area, which is compared to the SGV. However, as contaminant concentrations vary across a site, and sampling and analysis will introduce measurement errors, the comparison between measured mean concentration and the SGV must take this uncertainty into account.

There are two principal options available to obtain site representative soil concentrations from a site investigation dataset; statistical and non-statistical methods. Data objectives, quality and quantity are likely to determine which approach is most appropriate. If statistical methods such as those presented in CIEH/CL:AIRE (2011) are to be used, sufficient data need to be available or obtained. No one single statistical approach is applicable to all sites and circumstances. The wider range of robust statistical techniques developed by organisations including the US Environmental Protection Agency (USEPA) are also important tools. Risk assessors should choose an appropriate statistical approach on the basis of the specific site and the decision that is being made. For further guidance on the appropriate use of statistical approaches, refer to USEPA 2006 or good environmental monitoring statistics textbooks.

When statistical approaches are inappropriate (this will depend on the objectives of the site investigation), individual or composite samples should be compared directly to the SGV. Guidance on use of alternative data handling approaches such as the use of composite sampling can be found in documents such as:

- *Verification of remediation of land contamination* (Environment Agency, 2010);
- *Sampling and testing of wastes to meet landfill Waste Acceptance Criteria* (Environment Agency, 2005);
- *Guidance on choosing a sampling design for environmental data collection* (USEPA, 2002); and,
- *Soil Quality – Sampling, ISO 10381 series* (ISO, 2002–2007).

The statistical tests should not be used as arbiters for decisions under Part 2A. They are an additional, useful line of evidence to assist in decision-making. The implications of the basis for the derivation of the site representative soil concentration must be taken into account in any decision-making process and clearly documented.

Where the statistical tests are conducted in accordance with the method described in CL:AIRE 2009:

- For the Planning situation, it has to be demonstrated that the concentration of contaminants is low compared to the pC4SL/S4UL or SSAC. All of the test data should be below the screening criteria and no statistical analysis is required or if there are exceedances of the criteria then a statistical assessment is required. For the statistical assessment this decision is based on whether there is at least a 95% confidence level that the true mean of the dataset is lower than the screening criteria.

- For the Part 2A scenario the regulator needs to determine whether the concentration of contaminants is greater than the SGV/GAC/pC4SL/S4UL or SSAC. This decision is based on whether there is at least a 95% confidence level that the true mean of the dataset is higher than the SSAC. However, the regulator may proceed with determination if there is just a 51% probability, "on the balance of probabilities."

If the screening levels are exceeded then more sophisticated quantitative risk assessment can be undertaken or remedial action may be taken to break the contaminant linkages. The benefits of undertaking a quantitative risk assessment must be weighed against the likelihood that it will bring about cost savings in the proposed remediation. Further information about the use of soil guideline values is provided in Environment Agency : 2008: Using Soil Guideline Values SC050021/SGV Introduction, March 2008.

GENERIC RISK ASSESSMENT CRITERIA FOR RISK TO PLANTS

Soil contaminants, if present at sufficient concentrations, can have an adverse effect on the plant population. Phytotoxic effects can be manifested by a variety of responses, such as growth inhibition, interference with plant processes, contaminant-induced nutrient deficiencies and chlorosis (yellowing of leaves). All chemicals are probably capable of causing phytotoxic effects. Thus, the phytotoxic potential of substances is dependent on the concentrations capable of having adverse effects on plants and the concentrations likely to be found at contaminated sites. Phytotoxicity is a difficult parameter to quantify given that experimental techniques vary widely, and variations exist in plant tolerances, soil effects and synergistic/antagonistic reactions between chemicals. Contaminants may be taken up and accumulated by plants through a range of mechanisms. The principal pathways are active and/or passive uptake through the plant root, adsorption to root surfaces and volatilisation from the soil surface followed by foliar uptake. After plant uptake, contaminants may be metabolised or excreted, or they may be bioaccumulated and this is highly species dependant. Many of the substances capable of adversely affecting vegetation exert this effect because of their water solubility, a characteristic that could result in their transport from contaminated sites into adjacent locations where the chemical may generate a phytotoxic response. This could be important if, for example, the adjacent site has important conservation status.

The concentration in soil at which substances become phytotoxic depend on a range of factors including plant type, soil type, pH, the form and availability of the contaminant and other vegetation stress factors that may be present (such as drought). Some plants (including some rare plants will only grow in soils where there are relatively high concentrations which would be phytotoxic to other species. Whilst many contaminants may be phytotoxic, data are limited. Some heavy metals are essential as trace elements for plant growth but may become toxic at higher concentrations.

GroundSolve has carried out a review of a number of current and former guidance documents and other texts on phytotoxicity. It is not possible to produce a definitive list of phytotoxic substances on account of the variables mentioned above. However, a number of metals are repeatedly cited as commonly occurring priority pollutants. As a result, the following list is adopted by GroundSolve as indicators of the potential for phytotoxicity: As, Cr, Cu, Ni and Zn (note that Boron has been excluded from this list because the more modern studies do not assess this).

As the CLEA framework is a risk-based approach, applied to humans, an alternative strategy is required to assess the risk to plants from substances that are phytotoxic. Reference to published criteria and background concentrations can help put site data into context. Published assessment criteria for the protection of plant life from a number of countries are given in the following Table. The most authoritative source is the British Standard for topsoil, but this only lists three elements. LCRM states that the ICRCL Guidance Note 70/90 can be used for initial screening criteria. This approach has been adopted by GroundSolve where BS3882 is lacking, but where an ICRCL 70/90 criterion is lacking, the lowest criterion in Table below from, firstly UK, and, secondly, European and then other worldwide criteria. The adopted criteria are highlighted in the table 3.8. The MAFF value of 250 mg/kg has been chosen for As over the ICRCL value of 50 mg/kg as MAFF explains the 50 is applicable to vegetables and human health, whereas 250 is applicable to the plants themselves.

Table B.5: Published Assessment Criteria for Phytotoxic Elements (mg/kg)							
Reference	**As**	**CR (Total)**	**Cr (III)**	**Cr (VI)**	**Cu**	**Ni**	**Zn**
British Standard for topsoil (BS3882:2007)	-	-	-	-	200 (pH >7) 135 (pH 6-7) 100 (pH 5.5-6.0)	110 (pH >7) 75 (pH 6-7) 60 (pH 5.5-6.0)	300 (pH >7) 200 (pH 6-7) 200 (pH 5.5-6.0)
MAFF Code of Good Agricultural Practice for the Protection of Soil (1998)	250	-	400 for sites containing sewage and sludge	-	500 (grass) but may fall to 250 for clover and sensitive species (at pH>6)	110 (pH>7) 75 (pH 6-7) 60 (pH 5.5-6.0)	1000 (clover & grass at pH 6), may fall to 300 for sensitive species (at pH 6-7)
ICRCL 59/83 (1987) now withdrawn for human health assessment	-	-	-	-	130	70	300
ICRCL 70/90 (1990) threshold trigger value	50	-	-	25 *	250	-	1000
Dutch ecotoxicological intervention value (Swartjes 1993 & 1994)	40	230	-	7	190	-	-
Australian Guideline B(1) (1999), Interim Urban Ecological Investigation Level (EIL). Soils not generally considered phytotoxic below these EILs.	20	-	400	1	100	60	200
New Zealand guidelines for timber treatment sites (1977), estimated based on Cu bioavailability *	-	-	-	-	500 - 1000 clay soils	-	-
New Zealand guidelines for timber treatment sites (1977), soil criteria for protection of plant life (residential/ agricultural setting)	10-20	-	600	25	130	-	-
Note: * Cr (VI) is only likely to be present in as a significant proportion of total Cr where pH >12 so this does not routinely need to be tested for regarding plant health.							

CURRENT GUIDANCE FOR CONTROLLED WATERS RISK ASSESSMENT

Summary of Regulatory Context

Government policy is based upon a "suitable for use approach," which is relevant to both the current use of land and also to any proposed future use. When considering the current use of land, Part IIA of the Environment Protection Act 1990 [4] (EPA 1990) provides the regulatory regime, which was introduced by Section 57 of the Environment Act 1995 [5], which came into force in England on 1 April 2000. The main objective of introducing the Part IIA regime is to provide an improved system for the identification and remediation of land where contamination is causing unacceptable risks to human health, controlled waters or the wider environment given the current use and circumstances of the land. Part IIA provides a statutory definition of contaminated land under Section 78A(2) as:

> *"any land which appears to the Local Authority in whose area 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 controlled waters is being, or is likely to be, caused."*

Part IIA provides a statutory definition of the pollution of controlled waters under Section 78A(9) as:

> *"the entry into controlled waters of **any** poisonous, noxious or polluting matter or **any** solid waste matter"*

Part IIA is supported by a substantial quantity of guidance and other Regulations, especially for England, The Contaminated Land (England) (Amendment) Regulations 2012 and Contaminated Land Statutory Guidance (DEFRA, 2012) which came into force in early April 2012. The document re-confirms the duties of Enforcing Authorities in dealing with contamination including the role of the Environment Agency which has powers under Part 7 of The Water Resources Act (1991) to take action to prevent or remedy the pollution of controlled waters, including circumstances where the pollution arises from contamination in the land.

Part IIA introduces the concept of a contaminant linkage; where for potential harm to exist, there must be a connection between the source of the hazard and the receptor via a pathway. Risk assessment in contaminated land is therefore directed towards identifying the contaminants, pathways and receptors that can provide contaminant linkages. This is known as the contaminant-pathway-receptor link (CPR or contaminant linkage).

Part IIA places contaminated land responsibility as a part of the planning and redevelopment process rather than Local Authority or Environment Agency taking direct action except in situations of very high pollution risk or where harm is occurring. In the planning process guidance is provided by National Planning Policy Framework (NPPF) of March 2012. This requires that a site which has been developed shall not be capable of being determined "contaminated land" under Part IIA. Therefore, appropriate risk-based investigation is required to identify the contaminant

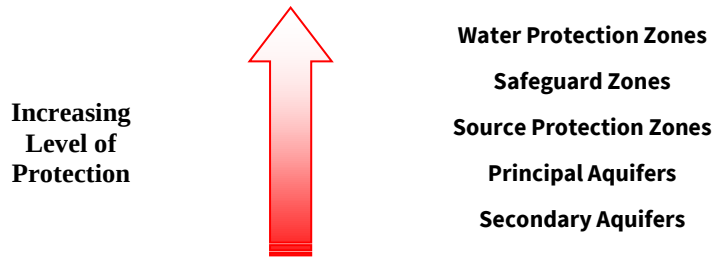
linkages that can then be assessed, and then mitigated using methods that can be readily agreed with the planners.

Environment Agency Guidance

Legislation and guidance surrounding the protection of controlled waters in the UK is numerous and can be complex. The Environment Agency's overall position on groundwater is *"To protect and manage groundwater resources for present and future generation in ways that are appropriate for the risks that we identify"* (The Environment Agency's Approach to Groundwater Protection, 2017). In brief, the core objectives of the existing legislation serve to enforce this position.

In 1992, the National Rivers Authority published their Policy and Practice for the Protection of Groundwater (PPPG), this document was influential as it provided a focus for key developments such as Source Protection Zones (SPZs) and Groundwater Vulnerability Maps. The Policy was then revised in 1998, since which there have been substantial changes in legislation, driven by Europe. Key European Directives relating to groundwater include the Groundwater Directive (80/68/EEC) and the Water Framework Directive (2000/60/EC). Aspects of these directives are controlled by primary UK legislation such as the Water Resources Act 1991 as amended by the Water Act 2003. Further to legislative changes, gaps identified in the 1998 PPPG required addressing. These changes are reflected in the Environment Agency Policy document *The Environment Agency's Approach to Groundwater Protection"* of March 2017.

The Environment Agency follows a tiered, risk-based approach to drinking water protection, and this should be taken into account when carrying out controlled waters risk assessment:



Tools available for Risk Assessment of Controlled Waters

In order for a developer of a potentially contaminated site to fulfil their obligations under the legislation, a site assessment would be required to be undertaken in order to identify any potential risks to controlled waters and to derive suitable clean-up criteria if necessary to ensure the protection of controlled waters. A number of tools are available for this purpose.

Three main stages apply to any risk assessment of controlled waters, these are:

i. Risk Screening (devise Conceptual Site Model, making reference to groundwater vulnerability maps, site setting etc)

ii. Generic Risk Assessment (using the EA Remedial Targets Methodology – Tier 1 - Comparison of groundwater data with relevant standards)

iii. Detailed Quantitative Risk Assessment (Consideration of aquifer properties and site-specific parameters, using the EA Remedial Targets Methodology - Tiers 2 & 3)

The process is summarised below (Taken from the Environment Agency GP3 consultation document, 2006):

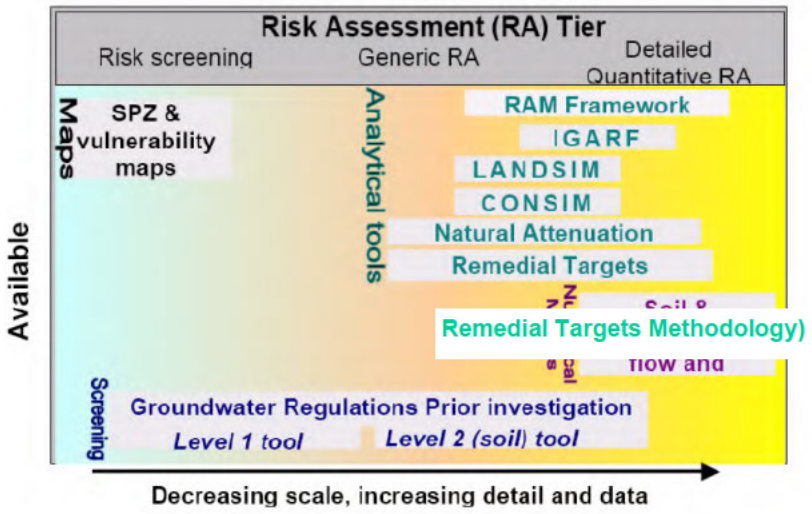


Figure 1-1 Environment Agency groundwater assessment tools, mapped against the different levels of risk assessment.

When assessing groundwater impact the Environment Agency advocate the application of their framework methodology "Remedial Targets Methodology – Hydrogeological Risk Assessment for Land Contamination" Environment Agency (2006). The methodology has four tiers of assessment:

Tier 1 utilises either a soil concentration (calculation of pore water concentrations based on partitioning calculations), leaching test or pore-water concentration of perched water as a source concentration input and these are contrasted directly to water quality standards. No dilution or attenuation is considered at Level 1.

Tier 2 (groundwater) considers dilution of the contaminant within the underlying receiving groundwater or surface water body. To determine a dilution, factor the infiltration rate of pore water and the discharge of groundwater beneath the source must be determined. Level 2 Assessment comprises a comparison between measured groundwater concentrations with to water quality standards.

Tier 3 considers natural attenuation in the form of dispersion, retardation and degradation of the contaminant. As the levels are progressed, the assessment becomes increasingly more detailed and less conservative as the data requirements are increased with each successive tier. The Environment Agency has released Excel Worksheets to carry out basic calculations using a conservative approach up to Tier 3. However, in this case the conceptual model is a simple one and assumes there is a simple migration of contaminants from the source zone into the aquifer receptor. Using these worksheets requires a sensitivity analysis showing how by varying each parameter, what effect it might have on the outcome of the assessment. Groundwater conceptual models are not always this simple.

Tier 4 is for more complex conceptual models where multiple sources, multiple pathways, multiple receptors and complex water balances can be assessed.

The Environment Agency developed a spreadsheet-based code to support the Remedial Target Methodology, and the code is capable of undertaking assessments for Tiers 1 to 3. Tier 4 assessment is not supported by the spreadsheet-based code.

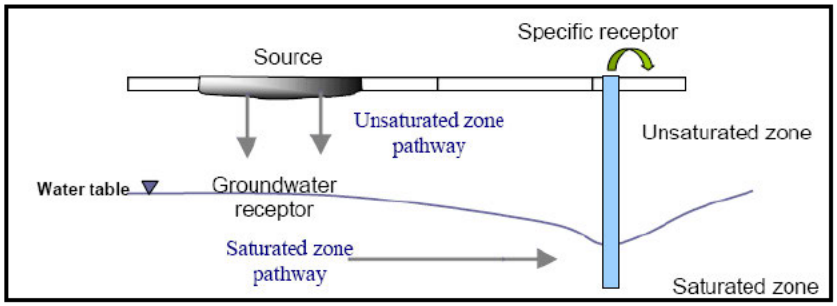
A more advanced code, ConSim 2, developed on behalf of the Environment Agency to support the Remedial Targets Methodology, allows for the introduction of additional geological horizons and is used mainly to determine the concentrations reaching a receptor and the timescales over which this may happen.

The codes assess only the dissolved phase contaminants. There are many further codes commercially available for use in controlled waters risk assessment, particularly for more complex situations, however, these should be used with caution and only once agreement has been obtained from the Environment Agency. All have the overall aim of the estimation of risk from contaminant linkages and the protection of controlled waters.

General notes on each stage of the controlled waters risk assessment process

Risk Screening

The understanding of the Conceptual Site Model (CSM) is the key to assessing any site. Using a robust CSM, potential pathways or receptors may be screened out from any further assessment at an early stage. For example, if the pathway through the unsaturated zone is blocked by the presence of a significant thickness of low permeability clay. A greater understanding of the CSM is achieved with each tier of risk assessment. An example of a basic Source-Pathway-Receptor concept is given below (taken from the Environment Agency GP3, 2006):



Generic Risk Assessment

When undertaking the Generic Hydrogeological Risk Assessment (EA Remedial Targets Methodology Tier 1), comparison of chemical analytical results is made with screening criteria. Published values of screening criteria with which chemical test results can be compared are published in the following guidance:

There is a hierarchy of screening criteria which is as follows:

- Updated Recommendations on Environmental Technical Standards, River Basin Management (2015-21), April 2012 by the UK Technical Advisory Group on the Water Framework Directive;
- Environmental Quality Standards (EQS) for freshwaters based on The EC Dangerous Substances Directive (76/464/EEC and Daughter Directives);

- Surface Waters (Abstraction for Drinking Water)(Classification) Regulations (1996)
- Surface Waters (Fishlife) (Classification) Regulations (1997)
- UK Drinking Water Standards (DWS) (Water Supply (Water Quality) Regulations 2000);
- Dutch Ministry of Housing, Spatial Planning and Environment (2001) Intervention Values and Target Values – soil quality standards;
- World Health Organisation Guidelines for Drinking Water (2004)

Should the Level 1 or 2 assessments indicate threshold levels to be exceeded, then there are three alternative ways in which to proceed:

- To devise suitable remedial solutions;
- To carry out more investigation, sampling and analysis;
- To conduct a site-specific Detailed Quantitative Risk Assessment (DQRA) to whether or not the soil materials are suitable for their site-specific intended use or to devise a site-specific clean-up level.

Detailed Quantitative Risk Assessment (DQRA)

The decision to carry out a DQRA will be dependent on the extent and implications of the initial qualitative and generic assessment. The scope of any such assessment will be accurately defined by the outcomes of the former two stages. The CSM will be sufficiently refined by this stage that only certain contaminants of concern, certain pathways and certain receptors will require further assessment, the remainder having been screened out.

Additional site-specific data is normally required for this stage of assessment, as explained above, more processes that are capable of affecting contaminant concentrations are considered (such as dilution and attenuation).

Remediation criteria derived will therefore be specific to each site and will be based on a detailed assessment of the potential impact at the identified receptor or *compliance point*. A greater level of confidence can be placed on the predicted impact on the compliance point following a DQRA.

Definition of Controlled Waters

The term 'controlled waters' is defined in Section 104 of the Water Resources Act 1991 as:

> *"Territorial Waters…which extend seawards for three miles…, coastal waters…, inland freshwaters, waters in any relevant lake or pond or of so much of any relevant river or watercourse as is above the freshwater limit, and ground waters, that is to say, any waters contained in underground strata."*

Note that the definition of groundwater under the Water Resources Act 1991 includes all water within underground strata (including soil / pore water in the unsaturated zone). The definition of groundwater under the Groundwater Directive however is limited to water in the saturated zone. For the purposes of Part IIA of the Environmental Protection Act 1990, the Environment Agency

recommends that the groundwater within the saturated zone only is considered as the receptor (rather than soil / pore water).

Environment Agency's Aquifer Designations

The Environment Agency have classified different types of aquifers from which groundwater can be extracted. The aquifer designations reflect the importance of aquifers in terms of groundwater as a resource (drinking water supply) but also their role in supporting surface water flows and wetland ecosystems. The aquifer designation data is based on geological mapping provided by the British Geological Survey.

The maps are split into two different types of aquifer designation:

- **Superficial (Drift)** – permeable unconsolidated (loose) deposits.
- **Bedrock (Solid)** – solid permeable formations e.g., sandstone, chalk, limestone.

The aquifer designations displayed on the Environment Agency maps are as follows:

- **Principal Aquifers (formerly termed Major Aquifers) –** These are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as a major aquifer.
- **Secondary Aquifers (formerly termed Minor Aquifers) –** These include a wide range of rock layers or drift deposits with an equally wide range of water permeability and storage. Secondary aquifers are subdivided into two types:
    - **Secondary A** - permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers;
    - **Secondary B** - predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering. These are generally the water-bearing parts of the former non-aquifers.
    - **Secondary Undifferentiated** - has been assigned in cases where it has not been possible to attribute either category A or B to a rock type. In most cases, this means that the layer in question has previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.
- **Unproductive Strata (formerly termed Non-Aquifer) –** These are rock layers or drift deposits with low permeability that have negligible significance for water supply or river base flow.

Hazardous and Non-Hazardous Substances

The Groundwater (England and Wales) Regulations 2009 control the disposal to the hydrogeological environment of potentially polluting substances which are divided into Hazardous Substances and Non-hazardous Contaminants (this roughly approximates to the former List 1 and List 2 substances).

Hazardous Substances are the most damaging and toxic and must be prevented from directly or indirectly entering the groundwater environment. Hazardous Substances include mineral oils and hydrocarbons, pesticides, biocides, herbicides, solvents and some metals. Discharge of Hazardous Substances to Controlled Waters must be prevented.

Non-hazardous Pollutants are any contaminants other than Hazardous Substances. Non-hazardous Pollutants are potentially toxic but are less harmful than Hazardous Substances, but their direct discharge to groundwater is generally not permitted and any indirect discharge to groundwater must be limited and be controlled by technical precautions in order to prevent pollution. Non-hazardous Pollutants include ammonia and nitrites, many metals and fluorides.

MANAGEMENT OF CONTAMINATED LAND

When risk assessment of the site has been completed and this indicates that remedial works are required, the main guidance in managing this process is set out in the DEFRA/EA online guidance LCRM (2020) "Land Contamination: Risk Management" The stages of managing remediation are as follows:

(a) Options Appraisal and develop Remediation Strategy;
(b) Develop Implementation Plan and Verification Plan;
(c) Remediation, Verification and Monitoring.

The Remediation Strategy sets out the remediation targets, identifies technically feasible remedial solutions and presents an evaluation of the options so that these can be assessed enabling that the most suitable solution is adopted. An outline of the proposed remedial method should be presented. Agreement should be sought of the appropriate statutory bodies for the Remediation Strategy before proceeding to the next stage.

The Implementation Plan is a detailed method statement setting out how the remediation is to be carried out including stating how the site will be managed, welfare procedures, health and safety considerations together with practical measures such as details of temporary works, programme of works, waste management licences and regulatory consents required. Agreement should again be sought of the appropriate statutory bodies for this Plan.

The Verification Plan sets out the requirements for gathering data to demonstrate that the remediation has met the required remediation objectives and criteria. The Verification Plan presents the requirements for a wide range of issues including the level of supervision, sampling and testing regimes for treated materials, waste and imported materials, required monitoring works during and post remediation, how compliance with all licenses and consents will be checked etc. Agreement should again be sought of the appropriate statutory bodies for the Verification Plan. On completion of the remediation a Verification Report should be produced to provide a complete record of all remediation activities on-site and the data collected as required in the Verification Plan. The Verification Report should demonstrate that the remediation has met the remedial targets to show that the site is suitable for the proposed use.

GLOSSARY

TERMS				UNITS	
AST	Above Ground Storage Tank			m	Metres
BGS	British Geological Survey			km	Kilometres
BSI	British Standards Institute			%	Percent
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes			%v/v	Percent volume in air
CIEH	Chartered Institute of Environmental Health			mb	Milli Bars (atmospheric pressure)
CIRIA	Construction Industry Research Association			l/hr	Litres per hour
CLEA	Contaminated Land Exposure Assessment			ha	Hectare (10,000m²)
CSM	Conceptual Site Model			µg/l	Micrograms per Litre (parts per billion)
DNAPL	Dense Non-Aqueous Phase Liquid (chlorinated solvents, PCB)			ppb	Parts Per Billion
DWS	Drinking Water Standard			mg/kg	Milligrams per kilogram (parts per million)
EA	Environment Agency			ppm	Parts Per Million
EQS	Environmental Quality Standard			mg/m³	Milligram per metre cubed
GAC	General Assessment Criteria			Mg/m³	Megagram per metre cubed
GL	Ground Level			µg/m³	Microgram per metre cubed
GSV	Gas Screening Value			m bgl	Metres Below Ground Level
HCV	Health Criteria Value			m bcl	Metre Below Cover Level
LNAPL	Light Non-Aqueous Phase Liquid (petrol, diesel)			mOD	Metres Above Ordnance Datum (sea level)
ND	Not Detected			kN/m²	Kilo Newtons per metre squared
LMRL	Lower Method Reporting Limit			kPa	Kilo Pascal – same as kN/m²
NR	Not Recorded			µm	Micro metre
OD	Ordnance Datum				
PAH	Poly Aromatic Hydrocarbon				
PCB	Poly-Chlorinated Biphenyl				
PID	Photo Ionisation Detector				
PCSM	Preliminary Conceptual Site Model				
SGV	Soil Guideline Value				
TPH (CWG)	Total Petroleum Hydrocarbon (Criteria Working Group)				
SPT	Standard Penetration Test				
SVOC	Semi Volatile Organic Compound				
UST	Underground Storage Tank				
VCCs	Vibro Concrete Columns	VSCs	Vibro Stone Columns		
VOC	Volatile Organic Compound				

APPENDIX D: PREVIOUS GSL FEASIBILITY STUDY AND GAP ANALYSIS

GroundSolve Ltd
Consulting Geotechnical Engineers

FEASIBILITY STUDY & GAP ANALYSIS: IPSEN EAST CAR PARK

GSL3387

VERSION 2

07 NOVEMBER 2025

Reissued following LMA Comments

Prepared for:

IPSEN
Innovation for patient care

Requested by:

LOVELOCK MITCHELL
ARCHITECTS

Prepared by: Alex Ridge

GroundSolve Ltd
Consulting Geotechnical Engineers

Document No :	GSL_IMSR003
Rev No:	0
Issue date:	10/01/2025

DOCUMENT CONTROL

Report No. :	GSL3387
Report Status:	Reissued following LMA Comments
Version No.:	2
Project Engineer:	Alex Ridge
Date of Issue:	07/11/2025

This report has been prepared by GroundSolve Ltd with all reasonable care and diligence, within the best practice and guidance current at the time of issue within the proposed redline boundary and proposed Site end use as presented by the Client.

This report is confidential to the Client and GroundSolve Ltd accepts no responsibility whatsoever to third parties to whom this report is presented.

Version No.	Description of Issue / Revision	Date of Issue	Author	Reviewed By	Approved By
2	**Reissued following LMA Comments**	04/11/25	Alex Ridge	Sam Fishburne	Sam Fishburne
			BSc (Hons) FGS	Beng (hons) MSc FGS CGeol	Beng (hons) MSc FGS CGeol
2	Reissued following LMA Comments	07/11/25	Alex Ridge	Sam Fishburne	Sam Fishburne
			BSc (Hons) FGS	Beng (hons) MSc FGS CGeol	Beng (hons) MSc FGS CGeol

CONTENTS

1 INTRODUCTION 1
1.1 Report Objectives 1
1.2 Introduction 1
1.3 Proposed Development 1
1.4 Limitations 2
2 SITE DETAILS AND DESCRIPTION 3
3 SUMMARY OF HISTORICAL DESK STUDY 4
4 PREVIOUS SITE INVESTIGATIONS 4
4.1 2053 – IPSEN Ash Road North, Wrexham East Site Development Geoenvironmental Report 5
4.2 2867– IPSEN East Phase 1 & 2 Ground Investigation Report 8
4.3 "3023– IPSEN East Additional Boreholes" and "3070 Ipsen East Site, Wrexham" 11
5 PREDICTED ONSITE GROUND CONDITIONS 14
6 CONSTRUCTABILITY 15
7 SUMMARY 16
8 GAP ANALYSIS 17

LIST OF TABLES

Table 2-1: Current Site Overview. 3
Table 3-1: Summary of chemical data – GSL2867 4
Table 4-1: Summary of the Exploratory Holes/Location 6
Table 4-2: Summary of ground conditions encountered 7
Table 4-3: Summary of the Exploratory Holes/Location 9
Table 4-4: Summary of ground conditions encountered 9
Table 4-5: Summary of the Exploratory Holes/Location 11
Table 5-1: Predicted Geology Below the Site 14
Table 8-1: Gap analysis summary 17
Table 8-2: Proposed works cost and programme 17

LIST OF FIGURES

Figure 1: Extract from Draft Masterplan 2
Figure 2: Site Extents 3
Figure 3: Extract of Drawing 2227-9501-P1 Building Location on Topo – 01/05/2023 - Lovelock Mitchell Architects 5
Figure 4: Borehole Location Plan – 2053 6
Figure 5: Borehole Location Plan – 2867 8
Figure 6: Exploratory Hole locations (Nov 2023 & April 2024) 12

APPENDICES

Appendix A – DRAWINGS
Appendix B – PREVIOUS REPORTS

1 INTRODUCTION

1.1 Report Objectives

GroundSolve Ltd was commissioned by Lovelock Mitchell Architects to undertake a gap analysis and review of previous site investigations undertaken across the eastern portion of the Ipsen BioPharma LTD site on Ash Rd N, Wrexham LL13 9UF. The purpose of this report is to provide a review of the currently available information on the ground conditions at the site to determine if further investigation is required to inform the design of foundations for a proposed multi storey car park, and if any other information relating to chemical contamination, ground obstructions and feasibility require further consideration or investigation.

1.2 Introduction

This report forms part of a wider feasibility study being undertaken by Lovelock Mitchell Architects to assess if any further information outside of that collected in previous projects is required. This report provides a review of previous GroundSolve Ltd investigations across the Ipsen East site, assessing the sufficiency of available geotechnical and geoenvironmental data for the design of a proposed seven-storey car park. The analysis identifies data gaps, evaluates the reliability of adjacent-site information, and outlines targeted further works required to mitigate design uncertainty

1.3 Proposed Development

Proposals for the development at this stage include the construction of a 7 level multi storey car park. Outline details of the proposed development are shown in **Figure 1** below.



Figure 1: Extract from Draft Masterplan

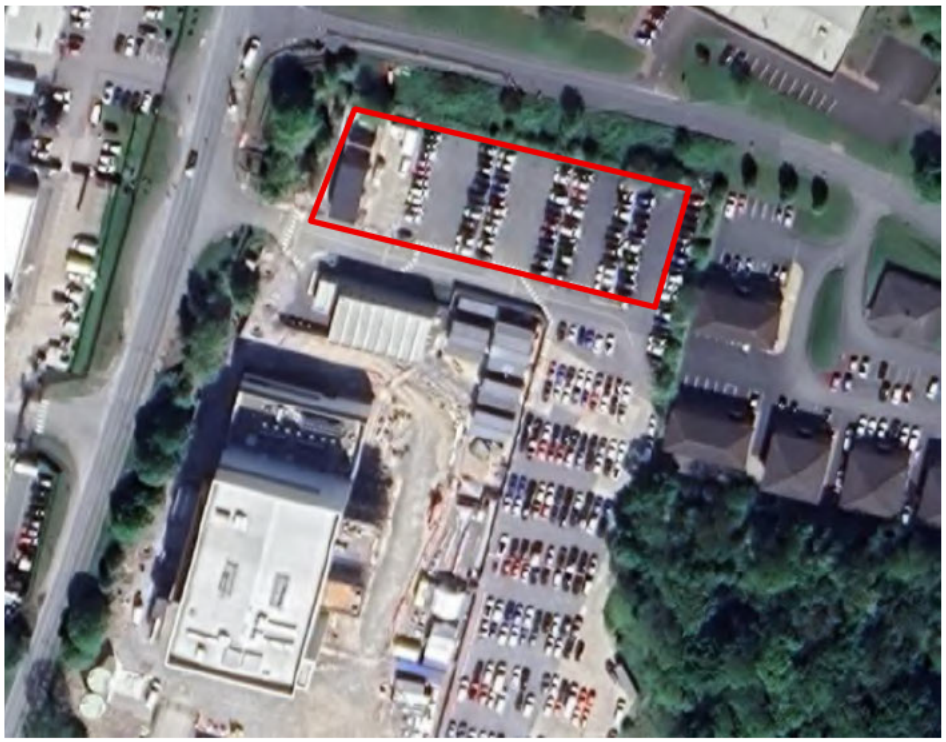
1.4 Limitations

GroundSolve Ltd have used reasonable skill, care and diligence to collate information as part of this report and to determine a scope of works following the review. There may be other conditions prevailing on the site which are outside the scope of work and have not been highlighted, therefore have not been considered by this report. Responsibility cannot be accepted for such site conditions not revealed by this report.

This report has been prepared for the sole use and reliance of the Client, Lovelock Mitchell Architects. No other third parties may rely upon or reproduce the contents of this report without the written permission of GroundSolve Ltd (GSL). If any unauthorised third party comes into possession of this report, then they rely on it at their own risk and GSL do not owe them any Duty of Care.

2 SITE DETAILS AND DESCRIPTION

Table 2-1: Current Site Overview.

Site name	Ipsen BioPharm LTD
Site address	Ash Rd N, Wrexham LL13 9UF
National Grid Reference (NGR)	337610 , 350192
Approximate Site area	0.32  **Figure 2: Site Extents**
Current land use on the Site	Car park
Surrounding land uses	The site is surrounded by industrial units.
General topography and ground levels	General topography levels show the site to fall southwest from 114mAOD in the north east corner to 109mAOD in the southwest
Published Geology	The majority of the site is underlain by Glacial Till overlying the Enville Member of the Salop Formation sandstone bedrock.

3 SUMMARY OF HISTORICAL DESK STUDY

Historical desk studies were undertaken for the area south of the proposed development site principally within GSL2867, The Phase I desk-based review concludes that the Ipsen Biopharm site is of generally low environmental risk, with limited potential for legacy contamination due to historical industrial use and minor made ground. The dominant natural materials (Glacial Till over fluvio-glacial deposits) provide low permeability, further reducing migration potential. A targeted intrusive investigation was warranted to confirm these findings and provide geotechnical data for redevelopment or expansion works which was discussed in **Section 3.2.** No contamination was found to be present on this area of the site, with soil chemical data findings summarised below in **Table 3-1.**

Table 3-1: Summary of chemical data – GSL2867

Determinand	Summary of findings
Metals	All results within published screening values (LQM/CIEH S4ULs for commercial/industrial). No exceedances identified.
TPH (Total Petroleum Hydrocarbons)	Low-level detections in a few Made Ground samples (typically < 50 mg/kg). None exceeded relevant GACs.
PAHs	Trace concentrations in isolated Made Ground samples. All below assessment criteria.
VOC / SVOC	Not detected.
Asbestos	None detected in any sample.
pH / Sulphate	Generally neutral (6–8) with low sulphate (< 0.5 g/l); no aggressive ground conditions.

4 PREVIOUS SITE INVESTIGATIONS

The proposed development site sits adjacent, and in some cases, overlaps areas of the wider site which have previously had site investigation undertaken. A summary of these site investigations and their findings can be found below with the following reports used within the subsequent sections;

- GSL2053 - IPSEN Ash Road North, Wrexham East Site Development Geoenvironmental Report
- GSL2867– IPSEN East Phase 1 & 2 Ground Investigation Report
- GSL:3023 and GSL:3070 - IPSEN East Additional Boreholes

4.1 2053 – IPSEN Ash Road North, Wrexham East Site Development Geoenvironmental Report

A Phase 1 and Phase 2 Site Investigation Report was prepared by GroundSolve Ltd for the adjacent site in March 2018 (GSL2053) for an area of land to the east of the Main Ipsen BioPharm facility.

The proposed development plan (**Figure 3**) comprised the construction of a large commercial building with vehicle parking areas and service provisions.

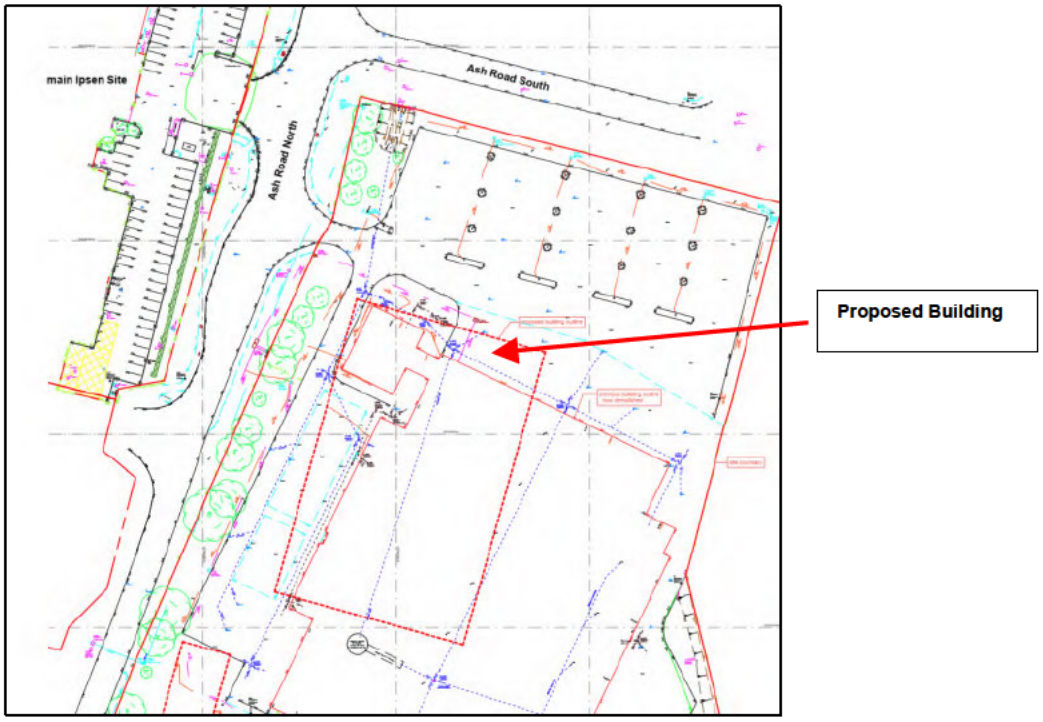


Figure 3: Extract of Drawing 2227-9501-P1 Building Location on Topo – 01/05/2023 - Lovelock Mitchell Architects

The report "GSL2053" included reference to 3No. window sample boreholes undertaken 150m northwest of the site (GSL1971), However, due to the distance, these have been discounted and as such only the 6No. boreholes undertaken under during the work for GSL2053 will be considered. Part of this work also included 1 No. shallow window sample borehole to the north (BH01) which lies in close proximity to the proposed multi-storey car park. A location plan indicating the location of the boreholes conducted in the investigation from 2018 (GSL2053) can be found below in **Figure 4**.

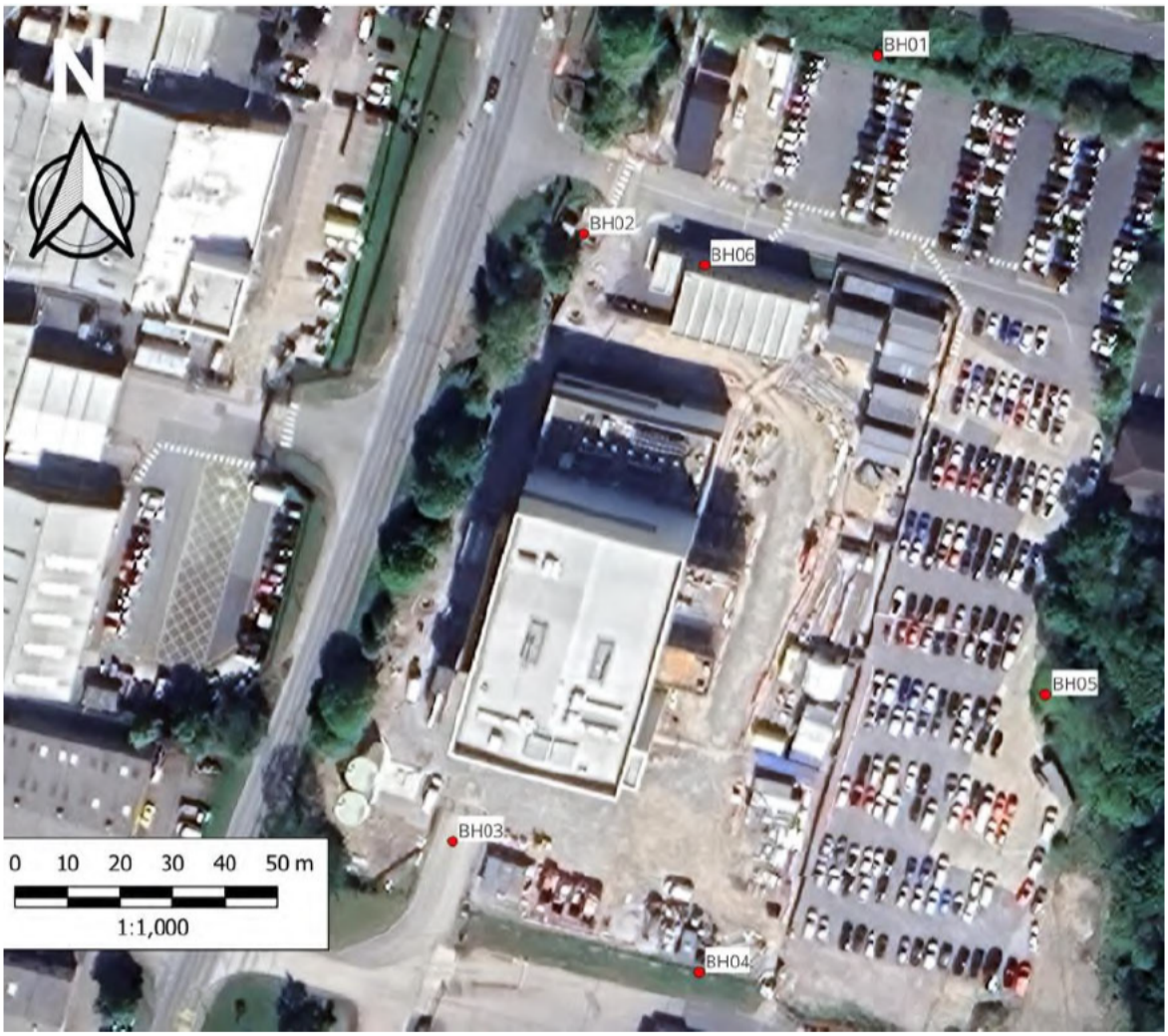


Figure 4: Borehole Location Plan – 2053

Exploratory Holes

A summary of the exploratory holes formed is listed in the following table.

Table 4-1: Summary of the Exploratory Holes/Location

GSL: 2053 - 2018					
Location ID	**Type**	**Easting**	**Northing**	**Ground Level (mOD)**	**Final Depth (mbgl)**
BH01	WS	337590	350226	Unknown	5.00
BH02	WS	337534	350192	Unknown	5.00
BH03	WS	337509	350076	Unknown	5.00
BH04	WS	337556	350051	Unknown	5.00
BH05	WS	337622	350104	Unknown	5.00
BH06	WS	337557	350186	Unknown	5.00

WS = Windowless Sample

Ground Conditions

The ground conditions were found in this investigation to predominantly comprise of Glacial Till overlain by variable thicknesses of Made Ground and Topsoil. Ground conditions across the site are generally consistent, with Glacial Till forming the main shallow stratum.

In the north (BH01–BH02), a limited thickness of topsoil overlies up to 2.00m of firm cohesive Made Ground, underlain by stiff Glacial Till. Shallow perched groundwater is identified at between 1.30m - 2.30m. The central/north-west area (BH06) includes a limited thickness of Made Ground (<1 m) directly over firm Glacial Till with subordinate sand lenses and perched groundwater at around 3.40m. The south-west (BH03–BH04) shows thicker Made Ground (up to 3.00m) with localised Alluvial deposits of soft silty clay above the Glacial Till at ~3.00m - 4.00m; perched water appears near 3 m. In the south-east (BH05), Made Ground (to 1.90 m) and a thin alluvial layer overlies stiff Glacial Till with subordinate wet sandy horizons and perched groundwater at ~4.5 m. In general significant deposits of generally cohesive made ground were encountered across the site (0.50 - 3.00 m), Alluvial materials are confined to southern areas, and stiff Glacial Till is consistent across the site, the underlying solid geology was not encountered. **Table 4-2** provides a summary of ground conditions encountered.

Table 4-2: Summary of ground conditions encountered

Stratum	Depth Range (approx.)	Description	Notes
Topsoil / Reworked Topsoil	0.0–0.4 m	Soft to firm clayey silt	Common across all boreholes
Made Ground	0.4–2.3 m	Clayey/sandy fill with gravel, brick, and concrete	Variable thickness; thickest (up to 3.2 m) in BH03
Alluvium (local)	~2.3–3.6 m	Soft grey silty clay with organic material	Present in BH04–BH05 only
Glacial Till	1.5–5.0 m	Stiff red-brown clay with grey sandy fissures, occasional wet sand lenses	Main natural stratum
Groundwater	1.3–4.5 m bgl	Perched water in sandy layers	No continuous water table observed

4.2 2867– IPSEN East Phase 1 & 2 Ground Investigation Report

A further Phase 1 and Phase 2 Site Investigation Report was prepared by GroundSolve Ltd for the same development in 2023 (GSL2867).

The investigation comprised 2 No. cable percussion boreholes (to 15.45 m bgl) and 6 No. trial pits (to 1.0 m bgl) across the site. **Figure 5** below shows the location of the exploratory holes

The study assessed both contamination and geotechnical parameters to support redevelopment of the Ipsen East facility. Ground conditions mainly comprised Made Ground over Glacial Till & Fluvio-glacial deposits, The underlying solid geology was not encountered. Groundwater was recorded between 11.0 m and 13.0 m bgl. There was no significant contamination issues identified, and the risk to controlled waters and human health was low.

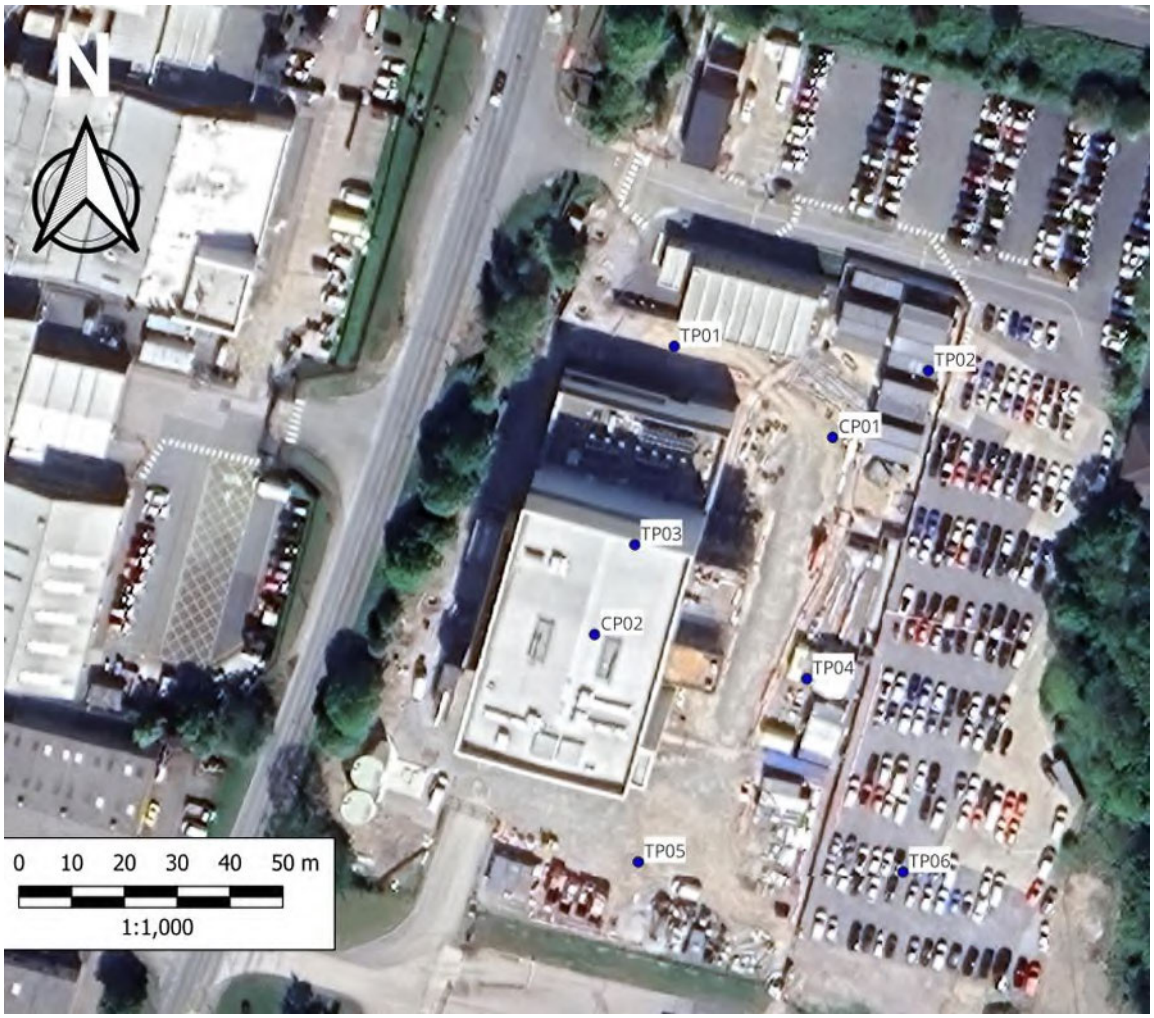


Figure 5: Borehole Location Plan – 2867

Exploratory Holes

A summary of the exploratory holes formed is listed in the following table.

Table 4-3: Summary of the Exploratory Holes/Location

GSL: 2867 - 2023					
Location ID	**Type**	**Easting**	**Northing**	**Ground Level (mOD)**	**Final Depth (mbgl)**
BH01	CP	337558	350127	36.8	15.45
BH02	CP	337570	350115	36.9	15.45
TP01	TP	337555	350130	36.8	1.00
TP02	TP	337565	350140	36.8	1.00
TP03	TP	337545	350120	36.9	1.00
TP04	TP	337560	350100	36.8	1.00
TP05	TP	337580	350110	36.9	1.00
TP06	TP	337590	350090	36.8	1.00

Ground Conditions

The ground conditions encountered during this phase of works where consistent with the previous investigation comprising variable thicknesses of Made Ground overlying superficial deposits of Glacial Till and Fluvio-Glacial Sands & Gravel, The underlying solid geology was not encountered. Ground levels are generally flat, between 36.8 and 36.9 mAOD across the site.

Made Ground was typically 0.4–1.9 m thick, and described as clayey and sandy gravel with brick, concrete, and tarmac fragments, thickest in the northern and eastern areas (CP01, TP02) and thinnest to the south (TP05). Beneath this, the Glacial Till comprises firm to stiff slightly sandy, slightly gravelly brown clay, extending to around 12.5 m depth, with SPT N-values of 9–32. Fluvio-Glacial deposits were encountered from 13.00m in both deep exploratory holes and described as medium dense silty fine to coarse sand. Groundwater was encountered at 13.00m and 11.00m in CP01 & CP02 respectively coinciding with the Fluvio-glacial materials.

Table 4-4: Summary of ground conditions encountered

Stratum	**Maximum depth to base of strata. (m bgl)**	Maximum Strata Thickness (m)	**Description**	**Notes**
Topsoil / Reworked Topsoil	0.4	0.40		
Made Ground	2.05	2.05	Clayey / sandy gravelly fill with fragments of brick, concrete, asphalt and sandstone	Variable thickness; reworked clay in areas of previous development
Glacial Till	14.70	12.70	Firm to stiff slightly sandy, slightly gravelly clay; occasional sand/silt lenses	QUT testing indicates clay of predominantly high strength. SPT N-Values consistent with firm to stiff consistency

Fluvio-glacial deposits	15.45	-	Medium dense silty fine to coarse sand.	Proven in deep boreholes BH01–BH02 only SPT N-Values indicate Medium dense
Groundwater	11.0 – 13.0		Groundwater recorded within fluvio-glacial deposits	Stable levels; no artesian conditions observed

4.3 "3023– IPSEN East Additional Boreholes" and "3070 Ipsen East Site, Wrexham"

Further investigation was subsequently undertaken by GroundSolve Ltd at Ipsen East, which comprised two cable percussion boreholes to a maximum depth of 26.50 m bgl, undertaken November 2023 and a further two cable Percussion boreholes to between 18.45 and 20.00m completed in March 2024. The investigation confirmed the shallow ground conditions along with providing further details on the underlying Fluvio-glacial deposits

Exploratory Holes

A summary of the exploratory holes formed is listed in **Table 4-5** below.

Table 4-5: Summary of the Exploratory Holes/Location

GSL: 3023 - 2023					
Location ID	**Type**	**Easting**	**Northing**	**Ground Level (mOD)**	**Final Depth (mbgl)**
CP03	CP	337559.40	350135.84	37.15	26.50
CP04	CP	337548.85	350123.83	37.15	18.95
GSL: 3070 - 2024					
CP301	CP	337546	350105	36.79	20.00
CP302	CP	337561	350135	37.17	18.45

The exploratory holes were centred on the proposed building in order to facilitate pile design. Approximate locations can be seen in **Figure 6** below.

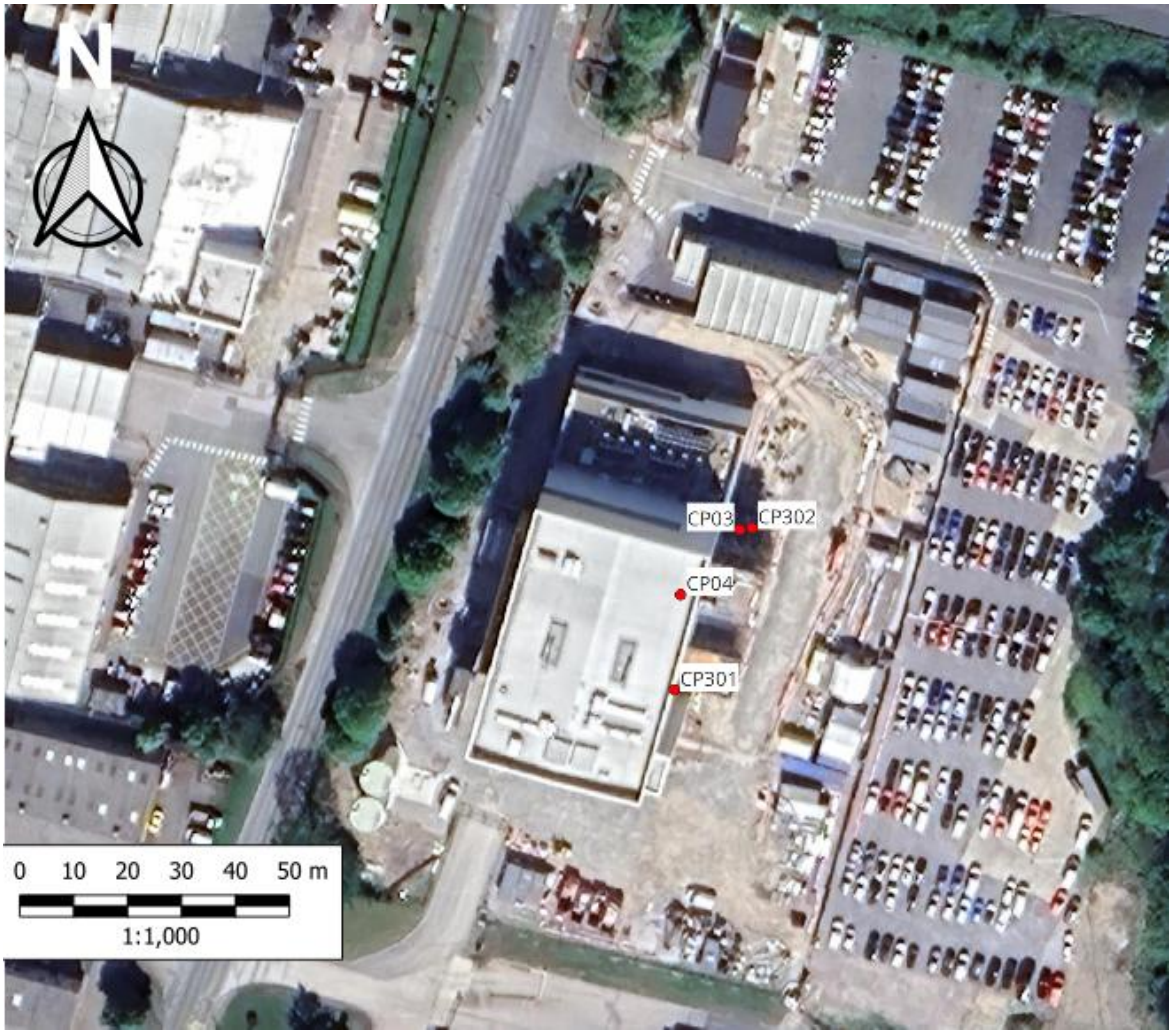


Figure 6: Exploratory Hole locations (Nov 2023 & April 2024)

Ground Conditions

The ground conditions encountered were consistent with the previous investigations. The earlier investigation (boreholes CP03 and CP04) and subsequent works (boreholes CP301 and CP302) confirm the presence of a thin surface cover of made ground or topsoil overlying cohesive glacial till of significant thickness, which transitions into loose to medium dense silty fine to coarse sand anticipated to be fluvio-glacial in origin.

Stratum	Maximum depth to base of strata. (m bgl)	Maximum Strata Thickness (m)	Description	Notes
Made Ground (Demolition rubble)	0.9	0.9	Generally loose fine to coarse gravel of brick and concrete	Anticipated to be demolition rubble from previous developments
Made Ground (Reworked Natural)	2.50	2.50	Soft to firm gravelly Clay. Gravel is angular to sub-angular of concrete	Anticipated to be reworked natural materials placed as part of the original development programme
Glacial Till	17.90	15.40	Stiff brown mottled grey Clay	Main superficial deposit across the site; cohesive and low permeability; and low plasticity consistent profile across all boreholes.
Fluvio-glacial deposits	26.50	9.60	Very loose to medium dense silty clayey fine to coarse sand.	Low N-Values likely as a result of artesian groundwater causing loosening
Groundwater	16.50 – 17.90	N/a	Rise between 1.50 and 16.50m	All groundwater strikes within the underlying fluvio-glacial deposits showing sub-artesian to artesian conditions when monitored

5 PREDICTED ONSITE GROUND CONDITIONS

GroundSolve have undertaken numerous site investigations adjacent to the proposed development plot and have undertaken 1 No. borehole on the development site itself, although this location was shallow and does not provide enough information to negate the need for further investigation. However the proximity of the adjacent development means it is possible to provide initial guidance as to anticipated ground conditions

Drawing No. GSL3387-DR-002 shows the exploratory hole locations for the various investigations

Across the site, the near-surface deposits are likely to consist of made ground or slightly sandy clay topsoil, typically up to 2.00m thick, comprising reworked fill material including gravel, brick, and concrete fragments. Beneath this, firm to very stiff brown and grey mottled sandy silty clay is present to depths of between 10 m and 19 m, representing glacial till. This cohesive deposit contains occasional gravel, cobbles, and minor silty partings, and in places includes thin interbedded granular horizons of silty sand and sandy gravel recorded between about 10 m and 14 m. Localised seepages within these sandy seams indicate perched groundwater but no continuous water table.

From around 14 m depth in the earlier phase and below 18 m in the later investigation, the till is underlain by Fluvio-glacial deposits comprising a loose to medium dense silty fine sand. Groundwater was noted within these deposits at sub artesian and artesian pressures.

An interpretative section through the site is shown as DWG No. GSL3387-DR-001 and **Table 5-1** below shows the anticipated ground conditions

Table 5-1: Predicted Geology Below the Site

Unit	Likely thickness	Depth to base (bgl)	Why (from sections)
Topsoil	~0.1–0.2 m	~0.1–0.2 m	Shown only at BH01 before Made Ground.
Made Ground	~0.4–1.0 m (locally up to ~2.5 m)	~0.5–1.2 m	Thin cap at BH01; slightly thicker where hardstanding/parking buildup present.
Glacial Till (stiff sandy/gravelly clay)	~8–12 m	~10 – 15m	Till is continuous beneath the area south of the site where historical boreholes have been undertaken, at BH01 only Till was proven within the drilled depth, while nearby CP02/CP04 show Till thicknesses of several metres before hitting granular strata. Expect the top of the granular horizon to be deeper under farther north.
Fluvio-glacial sands & gravels	present but likely below 13 - 15m bgl	TBC	Cross-sections show the granular package beneath the Till, thickening south/east (CP01–CP04/CP301). As the proposed site lies north of those points, it should be anticipated that the till–granular contact to occur slightly deeper or be unproven in shallow holes (as at BH01).
Bedrock	Not expected within 20-30m	>30m	Not reached in the sections; granular sequence continues at depth.

6 CONSTRUCTABILITY

Limited details regarding the proposed development are currently available. However, it is understood that unfactored column loads are likely to be in the region of 2200kN. Based on the anticipated ground conditions (Firm to stiff clay) it is expected that accommodating loads of this magnitude utilising conventional ground bearing foundations is unlikely to prove economic. Based on an allowable bearing capacity in the region of 150kN/m2 this would correspond to a 4.5 x 4.5m pad foundation consequently it is anticipated that a piled foundation will be required.

Driven piles were used extensively for the recently completed adjacent development with piles extending into the glacial till to depths in the region of 16.00m. Individual pile capacities were 300kN based on this and the anticipated column loads, pile groups of up to 10No. piles would be required. Construction of pile groups and the associated pile cap of this size is unlikely to be feasible and as such it is expected larger and/or deeper piles will be required to provide increased capacities.

Based on the anticipated loads and assuming a group of 4No. per column ultimate pile capacities will need to be in the region of 1800kN/pile. Its unlikely to be feasible to derive these sorts of capacities form precast driven systems so the most likely foundation solution will be either CFA or bored piles. Exact pile lengths and diameters will determined at detailed design stage however the presence of sub-artesian/artesian pressures in the underlying fluvio-glacial deposits means pile lengths will need to be restricted to within the Glacial Till and therefore increased capacities will need to be derived from pile diameters rather than length.

As a guide a 500mm dia CFA pile to 12.5m should provide the required 1800kN capacity.

7 SUMMARY

At this stage it is only possible to determine an initial ground model which will comprise Glacial Till to in the region of 17.00m overlying Fluvio-glacial sands with groundwater at significant sub-artesian/artesian pressure. Foundation solutions are likely to be restricted 450 -750mm dia CFA or Bored piles constructed entirely within the Glacial Till to between 10.00 – 15.00m dependant on final diameter.

8 GAP ANALYSIS

Although extensive ground investigation has been undertaken adjacent to the site, the proposed development site lacks sufficient ground investigation data to make an informed decision on ground conditions and any risk posed by contamination. The historical phase 1 desk studies undertaken only partially extend onto the proposed development site and do not principally target the proposed development site. The following table highlights the gaps of information which need addressing.

Table 8-1: Gap analysis summary

Aspect	Existing Data	Data Gaps Identified	Recommended Action
Geotechnical	Multiple boreholes to 26.5 m on adjacent site	Only one shallow WS (5 m) within development footprint	4 No. deep boreholes (≥25 m)
Contamination	Adequately assessed on adjacent plots (GSL2867)	No direct data from proposed MSCP footprint	Phase 1 Desk Study to confirm risk coverage
Groundwater	Existing data indicates potential for significant sub-artesian artesian water pressures at depth	No consistent groundwater response data at proposed site	Install monitoring in new boreholes. Grouted piezometers recommended due to potential groundwater pressures
Obstructions / Made Ground	Variable thickness (0.5–3 m) nearby	Unknown variability across site	To be investigated further in deeper boreholes.

As such the following is advised;

- Phase 1 Desk Study
- Phase 2 Ground Investigation comprising of a minimum of 4 No. deep boreholes ~30m.
- Groundwater monitoring to determine underlying water pressures
- Physical testing to classify recovered material and provide preliminary foundation solutions.
- Chemical Testing – As per risks highlighted within a Phase 1 Desk Study

Approximate budget costs for the above recommendations are included in **Table 8-2** below

Table 8-2: Proposed works cost and programme

Element	Budget cost	Duration
Phase I Desk Study	[redacted]	1 Week
Phase II Ground Investigation	[redacted]	2 Weeks field work 4 weeks reporting
Groundwater monitoring	Included in Phase II costs	8 Weeks

REFERENCES

AGS: 2010: Electronic transfer of geotechnical data (Edition 4 including addendum 3, 2011). Association of Geotechnical and Geoenvironmental Specialists.

BRE Special Digest 1: 2005 Concrete in aggressive ground.

BS 1377 : 1990 : Methods of test for soils for civil engineering purposes. Published in nine parts. British Standards Institution.

BS 5930 : 2015 + A1:2020 : Code of practice for site investigation. British Standards Institution.

BS 10175 : 2011 + A2:2017: Investigation of potentially contaminated sites – Code of Practice. British Standards Institution

BS EN 1997-1: 2004 : Eurocode 7 – Geotechnical Design – Part 1: General rules. Including UK National Appendix of November 2007. British Standards Institution.

BS EN ISO 14688-1 : 2002 : Geotechnical investigation and testing – Identification and classification of soil – Part 1: Identification and description. British Standards Institution.

BS EN ISO 14688-2 : 2018 : Geotechnical investigation and testing – Identification and classification of soil – Part 2: Principles for a classification. British Standards Institution.

BS EN ISO 14689 : 2018 : Geotechnical investigation and testing – Identification and classification of rock – Part 1: Identification and description. British Standards Institution.

BS EN ISO 22475-1 : 2006 : Geotechnical investigation and testing – Sampling methods and groundwater measurements – Part 1: Technical principals for execution (July 2011 reprint). British Standards Institution.

BS EN ISO 22476-3 : 2005 : Geotechnical investigation and testing – Field Testing – Part 3: Standard penetration test

ISRM: 1981: Rock Characterisation, Testing and Monitoring – ISRM Suggested Methods (Ed E T Brown). Commission on Testing Methods, International Society for Rock Mechanics, Pergamon Press.

ISRM: 1985: Suggested method for determining point load strength. Commission on Testing Methods, International Society for Rock Mechanics, International Journal of Rock Mechanics, Mining Sciences and Geomechanics Abstracts, Vol. 22

Britain From Above - https://britainfromabove.org.uk/en/image/WPW060399

http://www.warstateandsociety.com/Bombing-Britain

https://www.epa.gov/pfas/basic-information-pfas

UK Maps of Radon, http://www.ukradon.org/information/ukmaps

Health and Safety Executive (2015) Construction (Design and Management) Regulations.

Coal Authority Interactive Map Viewer, http://mapapps2.bgs.ac.uk/coalauthority/home.html

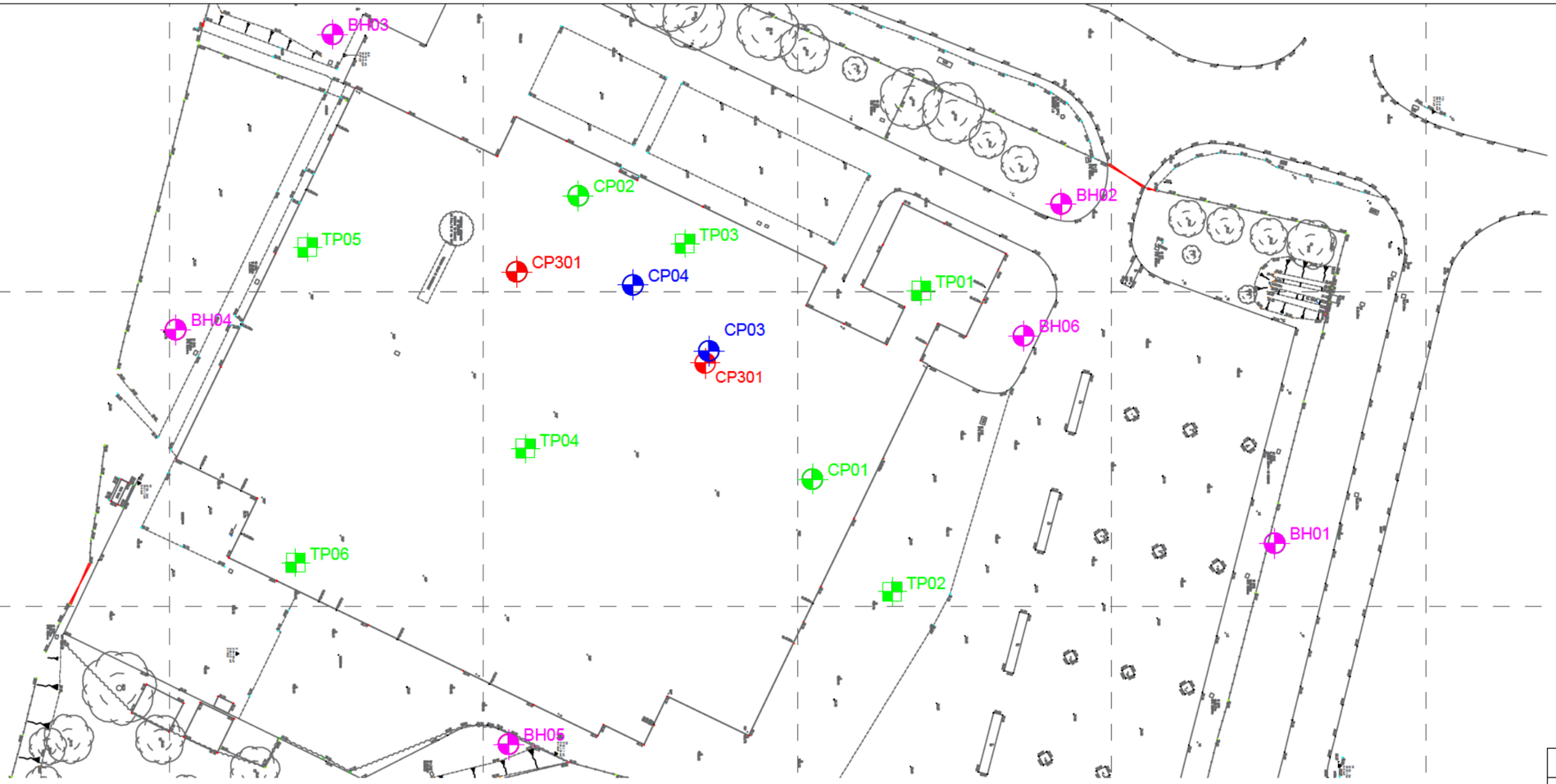
BGS Geology of Britain Viewer http://mapapps.bgs.ac.uk/geologyofbritain/home.html

9 DEFINITIONS

AOD	Above Ordnance Datum
bgl	Below ground level
BGS	British Geological Survey
BRE	Building Research Establishment
CBR	California Bearing Ratio (test)
COMAH	Control of Major Accident Hazards (regulations)
DQRA	Detailed Quantitative Risk Assessment
DWS	Drinking Water Standard
EQS	Environmental Quality Standard
GAC	Generic Assessment Criterion
GQA	General Quality Assessment (Environment Agency)
GQRA	Generic Quantitative Risk Assessment
GSV	Gas Screening Value
HCV	Health Criteria Value
IPPC	Integrated Pollution Prevention and Control (regulations)
NGR	National Grid Reference
NIHHS	Notification of Installations Handling Hazardous Substances (regulations)
OS	Ordnance Survey
ppm	Parts per million
ppmv	Parts per million by volume
SAC	Special Area of Conservation
SPZ	Source Protection Zone
SSAC	Site-Specific Assessment Criterion
SSSI	Site of Special Scientific Interest

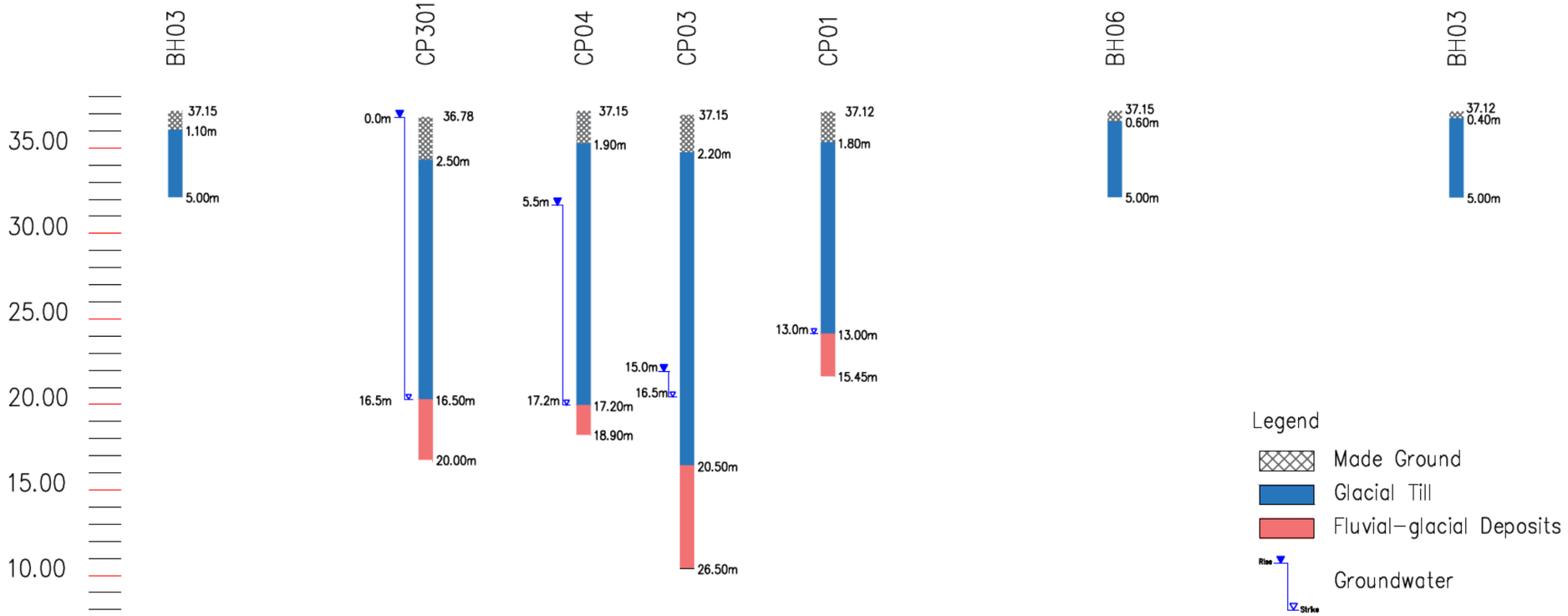
APPENDIX A – DRAWINGS

A3



Legend

- March 2024 GI
- November 2023 GI
- February 2023 GI
- February 2018 GI



Legend

- Made Ground
- Glacial Till
- Fluvial–glacial Deposits
- Groundwater (Rise / Strike)

Revision	Description	Date
A	Original Drawing	05.11.25

GroundSolve Ltd
Consulting Geotechnical Engineers

Unit 1, 85 Station Road
Queensferry
Flintshire CH5 2TB

Tel: 01244 592295

Job Title
Ipsen East Site Car Park

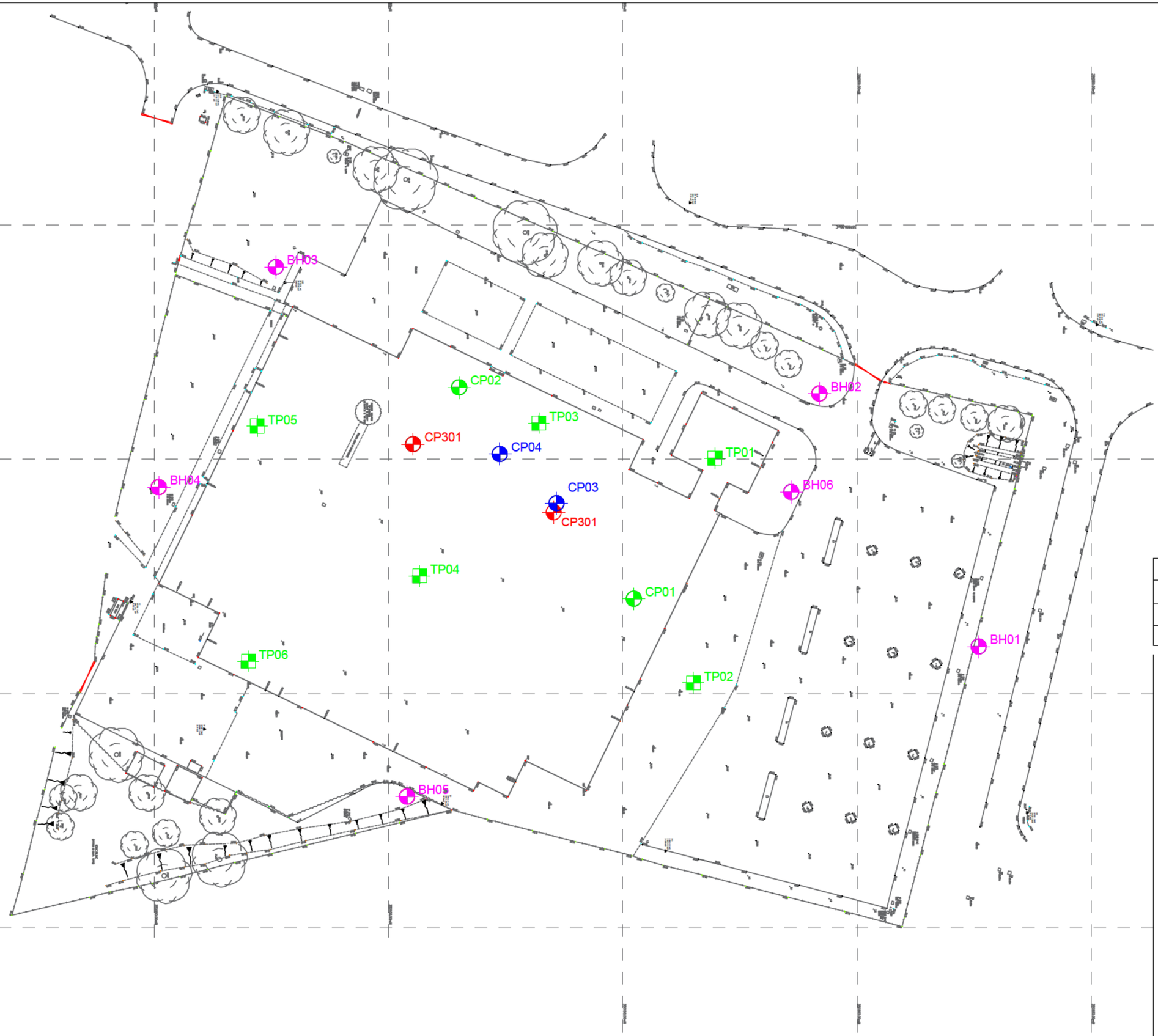
Drawing Title
Exploratory Hole Location Plan & Geological Cross Section

Drawing Scale	Drawn By	Approved By
Various	ALB	SF

Drawing Status	Date of Issue
Information	05.11.25

Drawing No	Revision
GSL3387–DR–001	A

A3



Legend

- March 2024 GI
- November 2023 GI
- February 2023 GI
- February 2018 GI

Revision	Description	Date
A	Original Drawing	05.11.25

GroundSolve Ltd
Consulting Geotechnical Engineers

Unit 1, 85 Station Road
Queensferry
Flintshire CH5 2TB

Tel: 01244 592295

Job Title
Ipsen East Site Car Park

Drawing Title
Exploratory Hole Location Plan

Drawing Scale	Drawn By	Approved By
1:800 @ A3	ALB	SF

Drawing Status	Date of Issue
Information	05.11.25

Drawing No	Revision
GSL3387-DR-002	A

APPENDIX E: CURRENT GUIDANCE FOR GROUND GAS RISK ASSESSMENT

Current Guidance for Ground Gas Risk Assessment

Origin of Ground and Landfill Gases

When carrying out a ground gas risk assessment for permanent ground gases (e.g., methane and carbon dioxide), the origin or source of the gases is important as potential risks will vary depending on the source. This Appendix relates to the risk of the two main ground gases of concern: methane and carbon dioxide and does not apply to other ground gases (e.g., radon or vapours from hydrocarbon spills). Methane and carbon dioxide are major constituents of landfill gas but can also occur from a variety of anthropogenic and natural sources, as summarised in Table G1 below:

Table G1. Potential Sources of Ground Gases

Gas	Source	Comments
Landfill Gas	Anaerobic decomposition of degradable waste within landfill sites. Typically, 60% methane and 40% carbon dioxide during methanogenic phase.	Composition varies over time, particularly in early stages. Contains a range of minor constituents (particularly carbon monoxide and hydrogen sulphide).
Landfill Associated Gases	- Anaerobic degradation of leachate external to the site; - Degassing of dissolved gases in groundwater; - Evolution of gases following interaction between leachate and groundwater	Can result in secondary (external) production of methane or carbon dioxide.
Made Ground	Anaerobic degradation of organic components	Very variable depending on source
Sewer Gas, Cess Pits	Anaerobic degradation of organic components of sewage producing methane and carbon dioxide.	Often characterised by hydrogen sulphide odour.
Mains Gas	Leakage from underground pipework or storage tanks. Mainly methane but often contains higher alkanes.	An odouriser is added to permit detection of leaks. Typically, 90% CH_4, but 1 to 27% C_2-C_4 alkanes, May also contain other trace gases e.g., CO, helium and CO_2 (from degradation of CH_4 in the ground).
Other Anthropogenic Sources	- Degradation of leaked or spilled hydrocarbons or other industrial chemicals; - Anaerobic degradation of organic contaminants in groundwaters (e.g., silage liquor); - Reactions between monitoring well construction components and environment; - Burial grounds/cemeteries.	Hydrocarbon spillages often have an 'oily' odour. Fuel spillages common – Petrol or Diesel and can contain a wide range of VOC's. Can degrade to produce methane / carbon dioxide.
Alluvium / Marsh / Peat Gas	Anaerobic microbial degradation of organic material (usually waterlogged vegetation / peat). Often associated with the presence of alluvial deposits or dredgings.	
Geogenic Gas	Natural seepages of carbon dioxide and hydrocarbon gases derived from geologic sources such as coal seams and deep oil / gas source formations. Can be present in solution in groundwaters.	Methane most common but can contain carbon dioxide and higher alkanes.
Mine Gases	Various types. Most common is "fire damp" with high methane, produced by the desorption of gas trapped in coal. "Black damp" (Stythe gas) with high carbon dioxide and denser than air. "White damp" is high in carbon monoxide.	Methane most common. Can contain higher alkanes, carbon dioxide and carbon monoxide. Often low in oxygen.
Natural Shallow Ground Gas	Various types - high carbon dioxide formed by subsurface aerobic activity leading to depleted oxygen and elevated carbon dioxide; - chemical degradation of rocks (e.g., carbonates) producing carbon dioxide; - carbon dioxide production in root zone of soils by plants.	Gases can be emitted from ground under falling barometric pressure conditions.

This Appendix concentrates on the assessment of risk from methane and carbon dioxide. This Appendix does not provide guidance for the assessment of risk when other gases are present due to 'Other Sources' from the above table (particularly organic compounds such as BTEX and VOC's or for the risk from radon or hydrogen sulphide).

To determine the origin of the gas a range of factors must be considered together, including;

1. Proximity of likely sources;
2. Ground conditions (geology, hydrogeology, anthropogenic pathways etc);
3. Properties of gases present including:
    a. Chemical composition;
    b. Physical properties;
    c. Ratios of components e.g., methane : carbon dioxide.
4. Timeframe of activities such as infilling periods, capping works, installation of gas control systems etc.

Identification of the originating source may be problematic given that there may be more than one source present and trace gas analysis may be required. Identification of the sources of the gases encountered during monitoring is usually carried out through a process of eliminating the most unlikely potential sources (given the site setting) and selecting those which are the more likely candidates.

Hazards Associated with Presence of Ground Gases

Methane gas is combustible and potentially explosive. When the concentration of methane in air is between the limits of 5.0%v/v and 15.0%v/v an explosive mixture is formed. The Lower Explosive Limit (LEL) of methane is 5.0%v/v, which is equivalent to 100% LEL. The 15.0%v/v limit is known as the Upper Explosive Limit (UEL), but concentrations above this level cannot be assumed to represent safe concentrations. Further, the LEL and UEL will vary (up and down) depending upon the proportion of other gases (including oxygen). However, the fact that methane is a colourless, odourless gas means that there is no simple indicator of the presence of the gas until such a time as explosive limits are reached, and an incident occurs. Methane is lighter than air and has a low toxicity. However, at high concentrations it can result in asphyxiation due to oxygen displacement.

Carbon dioxide is a colourless, odourless gas, which, although non-flammable, is both toxic and an asphyxiant. As carbon dioxide is denser than air, it will collect in low points and depressions. The UK Health & Safety Executive (HSE) has published information relating to concentrations of carbon dioxide that humans may be exposed to, which uses concentrations contained in the Control of Substances Hazardous to Health Regulations 2002 (as amended). These are the Long-Term Occupational Exposure Limit (LTOEL, 8-hour period) and the Short-Term Occupational Exposure Limit (STOEL, 15-minute period), which are 0.5% and 1.5% carbon dioxide, respectively.

Parameters Influencing the Rate of Ground Gas Production

Figure G2 is taken from EA guidance document LFTGN 03 illustrates typical ground gas generation curves from biodegradable materials:

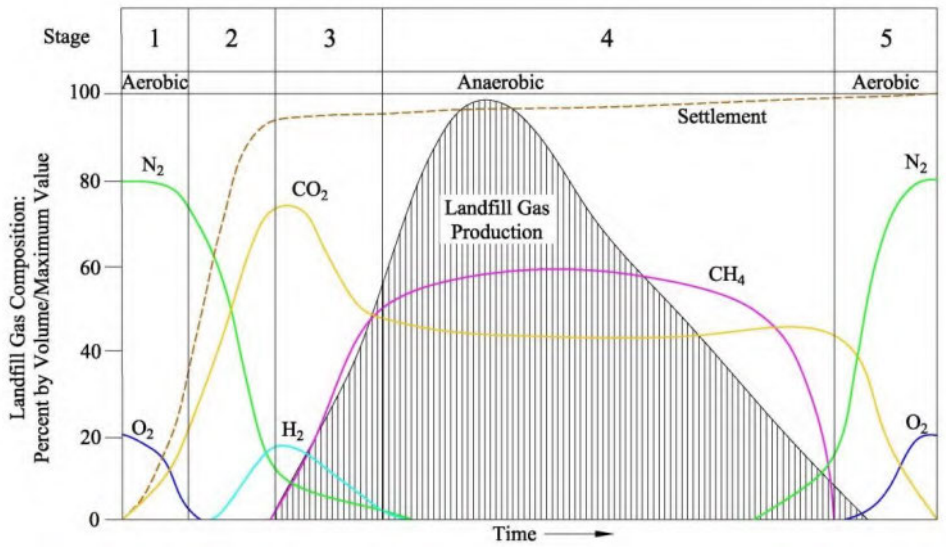


Figure G2. Idealised Representation of Landfill Gas Generation.

The production of methane and carbon dioxide at a landfill site may be expected to be considerable and ongoing. Concentrations of methane will eventually decrease, followed by concentrations of carbon dioxide, but the duration and rate of gas production can vary markedly between sites. Five distinct phases of gas production occur during the process which are, in order of event (as marked on Figure G2), as follows:

1. An aerobic phase involving oxygen depletion and temperature increase through aerobic respiration;
2. The establishment of anaerobic conditions and the evolution of carbon dioxide and hydrogen through acidogenic activity;
3. Commencement of methanogenic activity; the establishment of populations of methanogenic bacteria;
4. A phase of stable methanogenic activity, which may go on for many tens of years;
5. A phase of decreasing methanogenic activity, representing depletion of the organic material and a return to aerobic conditions.

The time scale for the return to the normal ground gas concentrations will be highly variable, depending upon the types and quantities of materials present. In addition, the optimum parameters influencing the rate of decomposition and ground gas production within the ground at a site are as follows:

- High water content with adequate rainfall and water infiltration to provide moisture content between approximately 20 to 26%;

- Conditions that either are or are very close to anaerobic;
- High proportion of biodegradable materials;
- A pH between 6.5 and 8.5, ideally verging slightly on the acidic between pH 6 to 7;
- Temperature between 25°C and 55°C;
- The ratio of the biochemical and chemical oxygen demands (BOD:COD);
- High permeability;
- Small particle size, as finer subsurface materials possess a greater surface area to provide a growing 'face' for the micro-organisms but high fines levels reduces permeability and reduces decomposition rate.

For this reason, it is vital that sources of methane and carbon dioxide are identified prior to the commencement of any work on a construction site, and that the ground gas regime is characterised at the worst temporal conditions a site may experience. From this, a risk assessment is carried out to identify the risk at the site from ground gases so that suitable protection measures can be designed and incorporated into a development to prevent a dangerous build-up of gas occurring.

Factors Influencing the Migration and Behaviour of Ground Gases

There are many factors that influence the migration of ground gases which can affect the risk from a gassing source:

- driving force – pressure differential along a pathway, diffusion and dissolved in solution;
- meteorological conditions – short term and seasonal conditions including atmospheric pressure changes (e.g., rapidly falling pressure causes gas to expand increasing emission rates), rainfall, frozen ground and thawing, temperature;
- geological and groundwater conditions – these can have the over-riding influence on the direction/pathways and quantity of migrating gas;
- anthropogenic influences – man-made pathways include mine shafts, service runs/drains, foundation piles, underground voids/pits/basements, foundation/building design/construction

Guidance Documents

Currently in the UK, there are no statutory threshold limits for hazardous gases in the ground as site specific variables mean that standard threshold values cannot be applied. The published guidance relating to development of sites where methane and carbon dioxide are present has been produced in response to building projects on or close to landfill sites, as both gases are principal constituents of landfill gas. Much of the historic guidance that has been produced on gas risk assessment focused on landfill sites and as a result there has previously been a lack of clarity when relating the process to gas conditions on non-landfill sites.

Statutory guidance regarding methane in the ground has previously taken a limiting concentration of 1.0 % by volume methane (equal to 20% of the lower explosive limit of methane in air) above which necessary actions will be appropriate. For carbon dioxide the limiting recommended trigger was 1.5 % by volume (the Long-Term Exposure Limit for carbon dioxide). Above these concentrations the Building Regulations Approved Document C (1992) stated that consideration should be given to whether actions may be appropriate, whilst more specific solutions would be likely to be necessary at concentrations greater than 5% by volume of carbon dioxide (Building Regulations Approved Document C, 1992). However, the latest fully revised version of Approved Document C (DoE, 2004) no longer endorses this approach and instead requires the use of a risk-based approach in interpreting the findings of a gas monitoring survey. Further, the latest EA documentation on landfill gas (LFTGN 03, 2004) continues to sanction the use of a risk-based approach through a structured approach to the assessment of ground gases and links with the risk assessment process outlined within CLR 11 for soil contaminants.

With the above in mind, recent guidance has been produced in 2006 and 2007 with the aim of providing up to date advice in relation to residential and commercial development. The guidance does not address issues associated with gas derived from landfills, for this refer to *"Guidance on the Management of Landfill Gas"* (Environment Agency 2004) for an overview.

Recent guidance relevant to gas assessments for residential and commercial development includes;

- **Wilson *et al.* (CIRIA C665, December 2007) *"Assessing Risks Posed by Hazardous Ground Gases for Buildings."***

  This document provides up to date advice on all aspects of ground gas risk assessment such as investigation, monitoring programmes, data collection and interpretation. The guidance presents separate methodologies for the characterisation of:

  - **All development types except low rise housing with gardens and for Low Rise Buildings without a 150mm void** (Situation A) (Table 8.5 CIRIA C665)

  and;

  - **Low rise housing with gardens with a 150mm ventilated sub-floor void** (Situation B) (Table 8.7 CIRIA C665)
    (See below for further explanation of the methods of characterisation)

- **Boyle and Witherington (NHBC / RSK Group, Report 10627-R01(04) January 2007) *"Guidance on the Evaluation of Development Proposals on Sites where Methane and Carbon Dioxide are Present."***

  This document presents the "Traffic Lights System" detailed below and is relevant only for low rise properties (e.g., bungalows and town houses) that have a ventilated sub-floor void (i.e., Situation B as described in CIRIA C665).

- **Wilson and Card (CIEH, expected 2011) *"Ground Gas Handbook for Designers and Regulators"***

  This document is expected to provide practical guidance on ground gas assessments and the design and evaluation of protection measures.

- **British Standard (BS 8485+A1, January 2019)** ***"Code of Practice for the Design of Protective Measures for Methane and Carbon Dioxide Ground Gases for New Buildings"***

  This document provides an overview of gas characterisation and assessment. The Standard is intended to be used by designers of gas protection measures and regulators involved in the assessment of design solutions. The Standard provides a framework in line with CLR11 allowing designers to judge the adequacy of ground gas and related site investigation data. The document provides an approach to determine appropriate ground gas parameters that can be used to identify a range of possible construction solutions mitigating against the presence of ground gas on a development site.

Each of these documents continues to highlight the importance of, and give further guidance towards, carrying out a tiered risk-based decision-making process in accord with government policy on dealing with contamination from historic or natural sources and highlight the importance of the Conceptual Model in site characterisation. These documents also stress the importance that the assessor should be confident that the ground gas monitoring results are representative of the likely worse case ground gas regime on a site and that the data collected from the site is sufficient. With this in mind, CIRIA C665 sets out ideal monitoring periods as below.

Idealised Frequency and Period of Monitoring (after Table 5.5a and 5.5b, CIRIA C665)

		Generation Potential of Source				
		Very Low	Low	Moderate	High	Very High
Sensitivity of Development	Low (Commercial)	4/1	6/2	6/3	12/6	12/12
	Moderate (Flats)	6/2	6/3	9/6	12/12	24/24
	High (Residential with Gardens)	6/3	9/6	12/6	24/12	24/24

Notes

1. First number is the number of readings and the second is the minimum period in months (e.g., 6/2 – six sets of readings over two months).

2. At least two sets of readings must be at low (preferably under 1,000 mb) and falling pressure.

3. High sensitivity end use on high or very high hazard site will not normally be acceptable unless the source is treated to reduce gassing potential.

Before the latest guidance, good practice for site characterisation had been based upon the method proposed by Wilson and Card (1999). CIRIA C665 (2007) effectively supersedes Wilson and Card (1999) and includes a modified version of the Wilson and Card method (Tables 8.5, 8.6 and Box 8.1). Gas concentrations and flow rates for either methane and/or carbon dioxide measured at a site to 'Characteristic Situations.' Appropriate protection measures are selected from Table 8.6 (if using modified Wilson & Card method) and from Box 8.4 from CIRIA C665 (if using the NHBC traffic lights method). Throughout the risk assessment process, strong regard must be given to the nature of the gassing source, the flow rates and the estimated surface emissions. Note that certain protection measures are stated in CIRIA Report 149 that are now considered wholly inappropriate to certain developments and consequently should not be used without modification. Throughout the process, it is important to remember that these tables are not

intended to be used as a definitive design tool and have been prepared to show the typical scope of measures for gas control.

Both the NHBC (2007) and CIRIA (2007) guidance documents and BS 8485+A1 (2019) propose that both ground gas concentrations and flow rates are used to calculate the limiting gas well gas volume flow rates for methane and carbon dioxide, based on the ground gas conditions monitored for during the worse-case temporal conditions. This limiting gas well volume flow rate is termed the Gas Screening Value (GSV, note that this was termed borehole gas volume flow), and is calculated as follows:

$$\textbf{GSV}\ (\text{l/hr}) = \frac{[\text{gas well gas concentration (\%v/v)}] \times [\text{gas well flow rate (l/hr)}]}{100}$$

These GSVs are then compared to generic 'Traffic Lights' contained within the NHBC guidance, which present typical maximum gas concentrations and limiting GSV's, for 'Situation B Development' (Low rise housing with gardens).

Table 8.7 NHBC Traffic light system for 150 mm void

Traffic Light	Methane [1]		Carbon Dioxide [2]	
	Typical max concentration [3] (% by volume)	Gas Screening Value [2,4] (litres/hour)	Typical max concentration [3] (% by volume)	Gas Screening Value [2,4] (litres/hour)
Green	1	0.13	5	0.78
Amber 1	5	0.63	10	1.6
Amber 2	20	1.60	30	3.10
Red				

Notes:

1. The worst-case ground gas regime identified on the site, either methane or carbon dioxide, at the worst-case temporal conditions that the site may be expected to encounter will be the decider as to what Traffic Light is allocated;
2. Borehole Gas Volume Flow Rate, in litres per hour as defined in Wilson and Card (1999), is the borehole flow rate multiplied by the concentration in the air stream of the particular gas being considered;
3. The Typical Maximum Concentrations can be exceeded in certain circumstances should the Conceptual Site Model indicate it is safe to do so;
4. The Gas Screening Value thresholds should not generally be exceeded without the completion of a detailed ground gas risk assessment taking into account site-specific conditions.

Box 8.4 of CIRIA C665 Gas protection measures for low-rise housing development based upon allocated NHBC Traffic light (Boyle and Witherington, 2007)	
Traffic Light Classification	**Protection Measures Required**
Green	Negligible gas regime identified, and gas protection measures are not considered necessary.
Amber 1	Low to intermediate gas regime identified, which requires low-level gas protection measures, comprising a membrane and ventilated sub-floor void to create a permeability contrast to limit the ingress of gas into buildings. Gas protection measures should be as prescribed in BRE Report 414. Ventilation of the sub-floor void should facilitate a minimum of one complete volume change per 24 hours.
Amber 2	Intermediate to high gas regime identified, which requires high-level gas protection measures, comprising a membrane and ventilated sub-floor void to create a permeability contrast to prevent the ingress of gas into buildings. Gas protection measures should be as prescribed in BRE Report 414. Membranes should always be fitted by a specialist Contractor. As with Amber 1, ventilation of the sub-floor void should facilitate a minimum of one complete volume change per 24 hours. Certification that these passive protection measures have been installed correctly should be provided.
Red	High gas regime identified. It is considered that standard residential housing would not normally be acceptable without a further Gas Risk Assessment and/or possible remedial mitigation measures to reduce and/or remove the source of gas.

For a 'Situation A Development' (All development except low rise housing with gardens), the GSV value is used to derive the appropriate Characteristic Situation from Table 8.5 of CIRIA C665 (below):

Table 8.5 from CIRIA C665 Modified Wilson and Card Classification					
Characteristic Situation (CIRIA R149)	**Comparable Partners in Technology gas Regime (see Box 8.2)**	**Risk Classification**	**Gas Screening Value (CH_4 or CO_2) (l/hr)[1]**	**Additional Factors**	**Typical Source of Generation**
1	A	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	B	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	C	Moderate risk	<3.5		Old landfill, inert waste, mine working flooded
4	D	Moderate to high risk	<15	Quantitative risk assessment required to evaluate scope of protective measures.	Mine working susceptible to flooding, completed landfill (WMP 26B criteria)
5	E	High risk	<70		Mine working unflooded inactive with shallow workings near surface
6	F	Very high risk	>70		Recent landfill site

It was intended in CIRIA C665 that the characteristic situation allocated to the development from the table above would then be used in Table 8.6 of CIRIA C665 in order to determine the level of gas protection the development requires. However, BS8485:2015 superseded this document and a different set of mitigation standards were put forward.

The recommended minimum gas protection score (points) be selected based on the building type (Table 3 which defines four building types) and the ground gas Characteristic Situation as detailed in Table 4 of BS8485:2015+A1:2019 (see below).

The first step in the decision-making process is to obtain the level of gas protection necessary in the range 0 to 7.5 from Table 4. Then a combination of structural barriers (Table 5) ventilation protection measures (Table 6) and/or gas resistant membranes (Table 8)should be chosen to meet that requirement. The level of gas protection necessary should take into account the characteristic gas situation and a number of other factors. The whole decision-making process should be made transparent, where all parties can see the approach being taken, can understand the various steps and decisions made and be confident that a risk-assessed solution has been designed and installed commensurate with the construction and site constraints.

Where the gas Characteristic Situation is 4 or more (and for NHBC Red situations according to CIRIA C665), the site requires a comprehensive risk assessment to confirm the scope of protection measures. These are higher risk sites and reliance on Table 4 alone is not sufficient.

BS8485:2015+A1:2019 Table 3 Building Types				
	Type A	**Type B**	**Type C**	**Type D**
Ownership	Private	Private or commercial/ public, possible multiple	Commercial / public	Commercial / industrial
Control (change of use, structural alterations, ventilation	None	Some but not all	Full	Full
Room sizes	Small	Small / medium	Small to large	Large industrial / retail park style

BS8485:2015+A1:2019 Table 4 Gas Protection Score by CS and Type of Building				
CS	Required Gas Protection			
	High risk	Medium risk	Low risk	
	Type A	Type B	Type C	Type D
1	0	0	0	0
2	3.5	3.5	2.5	1.5
3	4.5	4	3	2.5
4	6.5 (A)	5.5(A)	4.5	3.5
5	(B)	6A)	5.5	4.5
6	(B)	(B)	(B)	6
a) Residential building should not be built on CS4 or higher sites unless the type of construction or site circumstances allow additional levels of protection to be incorporated, e.g., high-performance ventilation or pathway intervention measures, and an associated sustainable system of management of maintenance of the gas control system, e.g., in institutional and/or fully serviced contractual situations.				
b) The gas hazard is too high for this empirical method to be used to define the gas protection measures				
NOTE 3 The NHBC has published guidance for use on residential developments, which utilise an alternative classification ("traffic light") system. This guidance typically applies to Type A buildings utilising beam and block floor constructions with clear void ventilation. The design choice variables are limited to decisions relating to the membrane specification and verification recommendations (see Table 7). Designers utilising this system would therefore need to refer to NHBC to assess compliance for specific recommendations [see 8485:2015 for further on this note]				
NOTE4 The method of selecting the combination of these types of protection is given in section 7.2 of BS8485:2015. Once type of measures has been decided, the detailed design and specification of the measures should be undertaken (section 7.3)				

Section 7.2 defines the order of selecting protective measures. The first choice is provided by structural barriers as defined in Table 5.

BS8485+A1:2019 Table 5 Gas protection scores for structural barriers		
PROTECTION ELEMENT/SYSTEM	SCORE	COMMENTS
Floor and substructure design		
Floor slabs Block and beam floor slab	0	*General – score conditional that breaches of slab are sealed*
Cast in situ ground-bearing floor slab (with only nominal mesh reinforcement)	0.5	
Cast in situ monolithic reinforced ground-bearing raft or reinforced cast in situ suspended floor slab with minimal penetrations (with only nominal mesh reinforcement)	1 or 1.5	*To achieve 1.5, raft or suspended slab to be well reinforced to prevent cracking and minimal penetrations*
Basement floor and walls to BS 8102:2009, Grade 2 waterproofing – See notes in BS8485:2015+A1:2019	2	
Basement floor and walls to BS 8102:2009, Grade 3 waterproofing - See notes in BS8485:2015+A1:2019	2.5	*Conditional that waterproofing is not based on geosynthetic clay liner*

Ventilation methods are detailed in Table 6, and points can only be gained from using one of the five types:

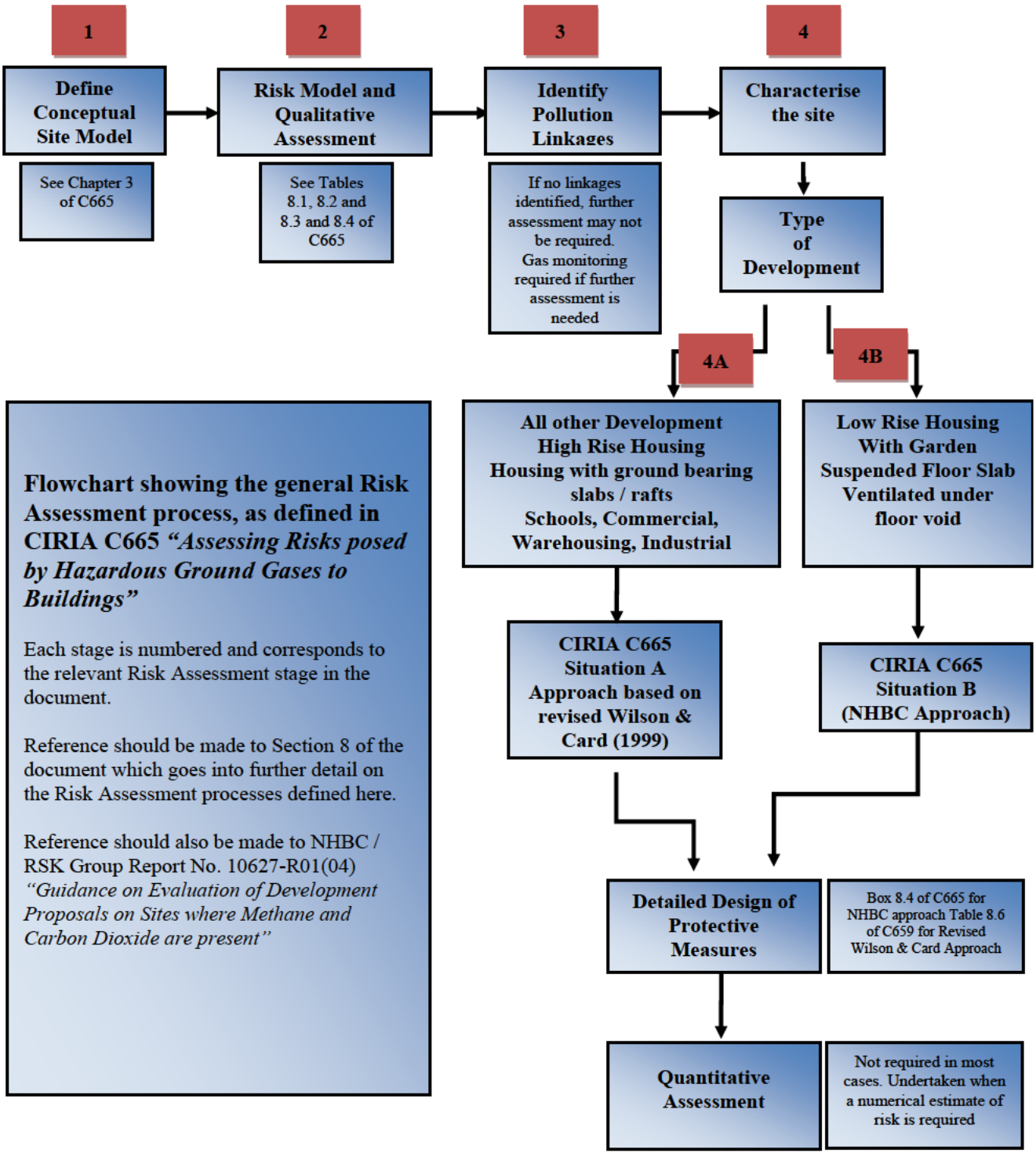
BS8485:2015+A1:2019 Table 6 Gas Protection Scores for Ventilation Protection Measures		
PROTECTION ELEMENT/SYSTEM	**SCORE**	**COMMENTS**
a) Pressure relief pathway (usually formed by low fines gravel or with a thin geocomposite blanket with strips terminating in a gravel trench external to the building	0.5	*Whenever possible, a pressure pathway relief pathway (as a minimum) should be installed in all gas protection measures systems.* *If a layer has a low permeability and/or is not terminating in a venting trench (or similar), then the score is zero.*
b) Passive sub floor dispersal layer Very good performance Good performance Media used to provide the dispersal layer are: • Clear void • Polystyrene void forming blanket • Geocomposite void former blanket • No-fines gravel layer with gas drains • No-fines gravel layer	 2.5 1.5	*Performance criteria shown in Fig B.6 and B.7 of BS 8484:2015.[See Annex B]*
c) Active dispersal layer, usually comprising fans with active abstraction (suction) from a subfloor dilution layer, with roof level vents. The dilution layer may comprise a clear void or be formed of geocomposite or polystyrene void formers	1.5 to 2.5	*This system relies on continued serviceability of the pumps; therefore, alarm and response systems should be in place. [See Annex B].*
d) Active positive pressurisation by the creation of a blanket of external fresh air beneath the building floor slab by pumps supplying air to points across the central footprint of the building into a permeable layer, usually formed of a thin geocomposite blanket	1.5 to 2.5	*This system relies on continued operation of the pumps; therefore, alarm and response systems should be in place. [See Annex B].*
e) Ventilated car park (floor slab of occupied part of the building under consideration is underlain by a basement or under croft)	4	*Assumes car park is vented , designed to Building Regulations 2000, Approved Document F.*

Membrane methods are detailed in Table 7.

BS8485:2015+A1:2019 Table 7 Gas protection score for gas resistant membrane		
PROTECTION ELEMENT/SYSTEM	**SCORE**	**COMMENTS**
Gas resistant membrane meeting all of the following criteria: • Sufficiently impervious to gases with a methane gas transmission rate <40.0 ml/day/m²/atm (average) for sheet and joints (tested in accordance with BS ISO 15105-1 manometric method) • Sufficiently durable to remain serviceable for the anticipated life of the building and duration of gas emissions; • Sufficiently strong to withstand in-service stresses (e.g., settlement if placed below a floor slab); • Sufficiently strong to withstand the installation process and following trades until covered (e.g., penetration from steel fibres in fibre reinforced concrete, dropping tools etc); and to withstand in-service stresses (e.g., settlement if placed below a floor slab) • capable, after installation, of providing a complete barrier to the entry of the relevant gas; and • verified in accordance with CIRIA C735	2	*The performance of membranes is heavily dependent on the quality and design of the installation, resistance to damage after installation, and the integrity of joints.* *If a membrane is installed that does not meet the criteria, then the score is zero.*
See notes in BS8485:2015+A1:2019 regarding membrane requirements		

For a site which is impacted by migratory gases from an off source, the development may be protected by imposing pathway intervention methods, which if successfully validated, could also remove the need for further analysis. It is essential that the gas regime in these circumstances has been fully characterised and that the only source impacting the site is located off site and that the pathway is clearly defined and its interception equally proven before construction commences. Pathway intervention methods may include vertical membrane installations, venting trenches, rows of stone columns, activated trenches and various proprietary systems. These systems are particularly relevant to domestic housing where there is limited scope for foundation type solutions.

Following the choice of protection measures, detailed design should be entered into [Section 8 of BS 8485:2015+A1:2019].



Flowchart showing the general Risk Assessment process, as defined in CIRIA C665 *"Assessing Risks posed by Hazardous Ground Gases to Buildings"*

Each stage is numbered and corresponds to the relevant Risk Assessment stage in the document.

Reference should be made to Section 8 of the document which goes into further detail on the Risk Assessment processes defined here.

Reference should also be made to NHBC / RSK Group Report No. 10627-R01(04) *"Guidance on Evaluation of Development Proposals on Sites where Methane and Carbon Dioxide are present"*