REMEDIATION METHOD STATEMENT

CONVERSION OF FORMER HEALTH FACILITIES TO DWELLINGS AND DEVELOPMENT OF NEW TERRACED DWELLINGS

AT

FLEET ROAD, HOLBEACH

FOR

INVICTA DEVELOPMENTS LIMITED

GDP PROJECT NUMBER 1804-2

29 MAY 2018

Issue	Date	Reason
1	2/5/18	For Approval
2	24/5/18	For Approval – amended clean cover system
3	29/5/18	For Approval – amended clean cover system.

Brownfield Consulting & Development

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Appendix 1: Layout Plan & Proposed Clean Cover System

1.0 INTRODUCTION

1.1 Authorisation and Context

GD Pickles Limited (GDP) was instructed by Invicta Developments Ltd to carry out an Environmental Assessment for the conversion of a former health care facility (Orchard House) into 14 dwellings and the development of a further 18 terraced dwellings (Fleet Mews) with associated infrastructure and parking at the former Fleet Hospital site on Fleet Road, Holbeach PE12 7BX (hereafter referred to as "the Site").

The proposed layout is presented on Plan-It Design Drawing number IDHH/DD/18/EW/01 reproduced as Appendix 1.

The purpose of this Report is to present the recommendations for remediation activity at the Site (as outlined in the Phase 2 Geoenvironmental Assessment Report) and other key issues to consider during groundwork at the Site.

This Remediation Method Statement follows the production of GDP Environmental Assessment Report, 1804, dated 9th March 2018.

The information provided in the previous report is only repeated within this Report where relevant for design or health and safety purposes.

Details of verification requirements for any remedial activity (including any imported construction materials) are included along with specific details of the proposed clean cover systems.

1.2 Development Proposals and Layout

The development comprises the conversion of a redundant health facility 'Orchard House' into 14 apartments with external public open space (POS) and hardstanding and the construction of 18 new residential units as three sets of terraces on the central and eastern area of the Site known as Fleet Mews. The Site layout is provided in Appendix 1.

Apartments within Orchard House are leasehold properties only with external areas maintained by a management company. The Orchard House development is ostensibly complete. It is accessed via a road in the south west of the Site (original access road) which runs the full length of the west of the property, around the north of the building to a car parking area on the east of Orchard House. External areas are public open space with some

turfed amenity areas allocated to ground floor apartments, although it is understood the creation of private gardens is not permitted under the terms of the leases. It is understood residents will pay a management fee for the maintenance of all common external areas including the POS, car parking, access road, footpaths, amenity turfed areas and fencing.
A circa 2m high fence separates the Orchard House development from Fleet Mews to its east.

Fleet Mews buildings are under construction and will be marketed as freehold premises with dedicated private garden outside spaces. There is central courtyard and access road for Fleet Mews which enters the Site from the south east corner. It is understood that residents will pay a management fee for the maintenance of all common external areas including the POS, car parking, access road, footpaths and all fencing.

1.3 Limitations

This Report has been prepared for the Client only and no liability is extended to any third party for their use or interpretation of the content of this Report. The Client should be aware that ownership and development on brownfield Sites carries risk and that unidentified development abnormals should be anticipated on brownfield Sites, particularly with regard to in-ground risks such as contamination, asbestos, waste and underground obstructions/made ground. This Report provides an assessment of the potential and/or actual ground conditions and contamination found at the Site based upon the available information and in the context of the scope of works performed. It does not provide a flood/drainage, geotechnical, asbestos, structural, ecological, archaeological or legal assessment or provide advice on other technical or financial matters which may be appropriate when considering brownfield Site ownership and development. The Client should satisfy itself that it has adequate information on which to make its own decision with regards the commercial and legal issues associated with owning, acquiring and/or developing the Site.

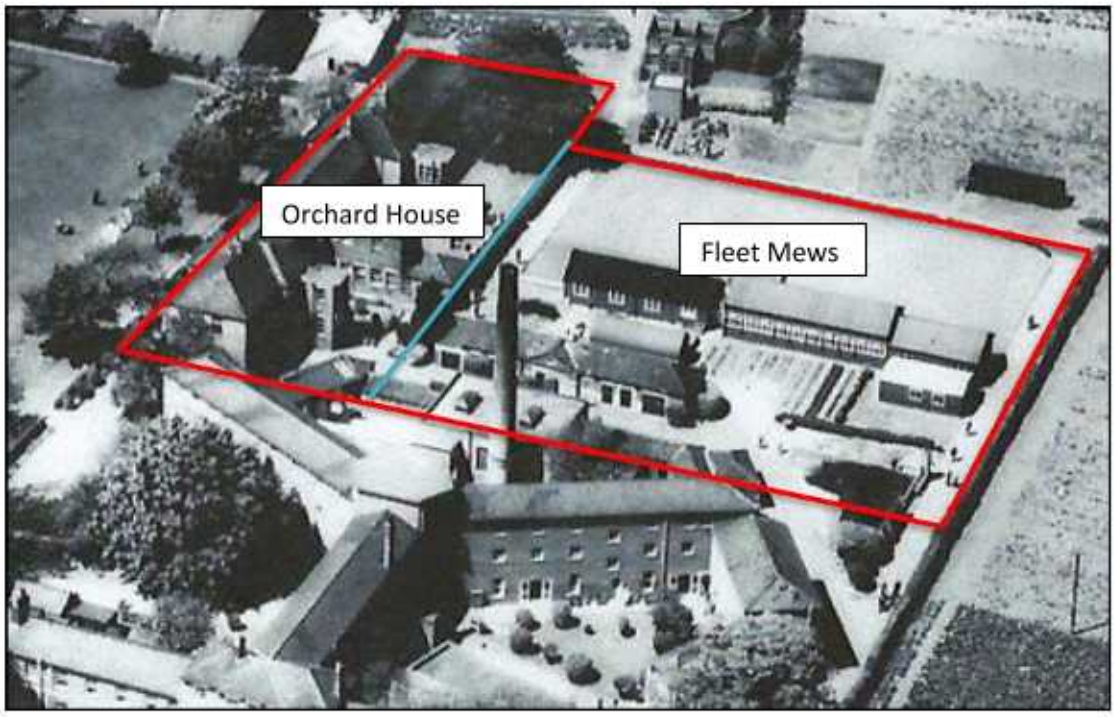
All ownership and development risk rests with the developer and owner and while GDP will employ all reasonable endeavours to assist the Client manage and mitigate those risks, no liability is accepted by GDP for any loss, damages, or consequential or third party losses which may be suffered by the Client and all liability is limited to 5 times GDP fees for a period of 1 year following completion of our services, or those set out in our terms and conditions at the time of instruction.

During the preparation of this Report, GDP reviewed and evaluated information provided by a number of other sources including Groundsure, QTS Environmental Ltd, the Environment Agency (EA), British Geological Survey (BGS), the Client, its design team and others. GDP's

conclusions, opinions and recommendations are based upon this information. GDP does not warrant the accuracy of the information provided to it and will not be responsible for any opinions which GDP has expressed, or conclusions which it has reached in reliance upon information which is subsequently proven to be inaccurate. The interpretation contained in this Report is only applicable to the development proposals provided to GDP at the time of writing.

2.0 SUMMARY OF SITE INVESTIGATION FINDINGS

The Site is divided into two areas – The west of the Site being Orchard House, its public open space, amenity areas and hardstanding. This is separated from Fleet Mews to the east by a circa 2m high panel fence which is sited approximately on an old hedge line which historically separated Orchard House from the small prefabricated buildings and gardens/bowling green on the current Site of Fleet Mews. A historic site layout is shown on the aerial photograph below.



2.1.1 Orchard House – Public Open Space (POS)

Most external space surrounding the Orchard House area is laid to hardstanding comprising compacted gravel underlain in some places by tarmac, which was the historic road surface. Soil sampling and analysis from POS surrounding Orchard House identified a single exceedance of lead over the selected GAC (POS Resi). The soil sample was collected from soil beneath a gravel mulch and non-woven weed membrane in a narrow permanently planted strip along the western frontage to Orchard House.

Elevated concentrations of target contaminants were not identified in shallow soils collected from turfed amenity spaces assigned to ground floor apartments.

2.1.2 Fleet Mews

Suspected fragments of ACMs were observed in several locations across the Fleet Mews area, in particular in proposed garden areas on the east side of Fleet Mews and in trench arising stockpiles in the central area of the Site. Analysis of bulk asbestos samples identified chrysotile asbestos cement. It is considered likely that the ACM fragments originated from demolition of the small 'prefabricated' buildings in the central and eastern areas of the Site (seen on the above historical photograph), which took place prior to the Client's acquisition of the Site.

The ground investigation focussed on near surface soils as the most likely to be impacted from historical use and most likely to come into contact with construction workers and end users. Findings of the soil investigations and risk assessments reported in the GDP Environmental Assessment Report indicate that soils surrounding the Fleet Mews area of the Site contain PAH compounds in excess of the LQM S4UL GAC for residential with home grown produce land use. With the exception of soil from HP12, all exceedances were observed in soils on the east of the development Site or from spoil in the central courtyard area.

Chrysotile and Amosite asbestos fibres were identified in 6 of 18 soil samples collected from proposed gardens and trench arisings from Fleet Mews. Of the six positive results three were recorded at concentrations below quantification (<0.001%). Positive quantification ranged from 0.002% amosite in HP1A (gardens east), 0.009% chrysotile in HP4 (gardens east) to 0.060% chrysotile in SP7 (trench arisings courtyard).

Soil in all gardens was noted to be an unsuitable growing medium and was typically hard-to-dig compacted made ground.

3.0 REMEDIATION STRATEGY

These remediation recommendations are made on the basis of the investigations undertaken to date.

Further contamination issues may arise during construction phases and further assessment may then be required.

3.1 Orchard House

Based on the investigation undertaken to date there is a single elevated concentration of a target contaminant. This relates to lead within soils located within a narrow permanently planted area of landscaping covered in a membrane and gravel mulch. There is therefore no plausible exposure pathway from this exceedance to end users or contractors and remediation is not considered warranted.

The building is Grade II listed and is within a conservation area meaning any additional development proposals will require planning permission. Depending on the development proposals submitted it is anticipated that any Planning Permission granted by the Local Planning Authority would be conditioned for additional investigation, risk assessment and remediation if necessary.

Existing limitations to tenants creating planting areas should be maintained in the leases as legally binding obligations.

Based on the investigation findings and the historic use and layout of the Site the potential for significant previously unidentified contamination on the Orchard House area of the Site is considered low. However, as with any previously developed land, the management company and any appointed maintenance crews should be made aware of the potential for previously undiscovered contamination, including ACM, and records should be maintained in the Site Health & Safety File such that appropriate risk assessments and method statements can be prepared for subsurface works, should these be required in future.

3.2 Fleet Mews

Remediation is required on the Fleet Mews area of the Site in order to break exposure pathways to end users from contamination identified during the ground investigation. Construction phase risks also require careful management.

In the case of PAH contamination the principal exposure route is via dermal contact and ingestion of soil and soil borne dusts. The exposure route for lead is ingestion of soil and soil borne dusts. Inhalation of fibres is the exposure route for asbestos. Removing the potential for exposure to soil and dust generation from made ground is therefore the key to successful remediation of the Site.

In order to break the exposure route to end users the following remediation strategy is proposed. The engineering make-up of the proposed cover systems are shown on the drawing in Appendix 1.

3.2.1 Site-Wide Requirements – Asbestos

- The presence of ACMs at the Site surface and very low concentrations of asbestos free fibres in the Made Ground soils is the most significant issue to be managed in developing this Site.

- The assessment and actions taken with regards to the asbestos issues should at all times be protective of all potential exposure routes, compliant with current legislation and best practice but must remain pragmatic and managed in the context of the proposed development and its setting.

- The contractor is to ensure that the potential for liberating asbestos fibres from the ground or crushing asbestos cement with site machinery and creating a potential pathway for fibre inhalation must be avoided.

- A competent contractor is to perform a thorough visual inspection of the Site surface and any fragments of suspected ACM found are to be hand-picked and double bagged for off-site disposal at a suitably licenced facility.

- A site diary recording the hand picking activity and duty of care disposal records of any material removed form Site must be maintained on site and provided to GDP when the works are complete for incorporation into the Remediation Verification Report.

- During construction activity and groundworks the Site is to be damped down to prevent dust generation. The frequency of damping down will depend on prevailing weather conditions and traffic on exposed made ground and the contractor is to ensure that damping down is undertaken sufficiently frequently to ensure dust

production is mitigated until the final site surface is laid to permanently eliminate the exposure pathway and mitigate the risk.

- All work with asbestos needs to be undertaken in accordance with the Control of Asbestos Regulations 2012 and all related regulations and best practice including C733 *Asbestos in soil and made ground: a guide to understanding and managing the risks and* GDP recommends that the document CAR-SOIL ™ *Control of Asbestos Regulations 2012 Interpretation for Managing and Working with Asbestos in Soil and Construction and Demolition Materials Industry Guidance* is used to manage any residual risks from asbestos at the Site and to generate suitable documentation. It is understood that a CAR Risk Assessment has been prepared by the main contractor for the construction phase risk associated with asbestos.

- The presence of asbestos fibres in soil does not prevent the reuse of those soils on the site of origin or at a receiver site provided appropriate measures, plans and/or permits are in place.

- Waste or materials descriptions for exported soils shall clearly indicate that the soils may contain asbestos. Additional analysis may be required on materials to be exported such that the classification (in relation to asbestos) is correctly established.

- The presence of asbestos impacted soils with certificates of analysis shall be included in the Site Health & Safety File.

- Made Ground soils should not be reused in service trenches even if they appear suitable on the basis of physical description and grading.

3.2.2 Clean Cover System - Private garden areas

Gardens are to be laid to either artificial turf or paving/patio to be built up using a robust, durable and impractical to remove engineered cover system.

The cover system for lawn areas will be as follows:

- Existing consolidated made ground to be covered with a proprietary orange contamination marker membrane (e.g. 'Terram Hi Viz', or similar);
- 75mm imported consolidated hardcore;
- 6mm concrete reinforcing mesh on 100mm grid centres;
- 75mm imported consolidated hardcore;
- 50mm imported sand;
- Grono Artificial Turf.

The cover system for patio and paths will be as follows:

- Existing consolidated made ground to be covered with a proprietary orange contamination marker membrane (e.g. 'Terram Hi Viz', or similar);
- 75mm imported consolidated hardcore;
- 6mm concrete reinforcing mesh on 100mm grid centres;
- 75mm imported consolidated hardcore;
- 50mm imported sand;
- 450mm x 450mm concrete paving slabs.

3.2.3 Clean Cover System - Common Areas

The cover system for parking bays will be as follows:

- Compacted existing made ground to be covered with 150mm imported consolidated hardcore;
- 25mm imported sand;
- Concrete block paviors.

The cover system for common area footpaths will be as follows:

- Compacted existing made ground to be covered with 150mm imported consolidated hardcore;
- 50mm imported sand;
- 450mm x 450mm concrete paving slabs.

The cover system for the road will be as follows:

- Compacted existing made ground to be covered with 150mm imported consolidated hardcore;
- 75mm tarmac.

The cover system for bins and bike stores will be as follows:

- Existing consolidated made ground to be covered with a proprietary orange contamination marker membrane (e.g. 'Terram Hi Viz', or similar);
- 75mm imported consolidated hardcore;
- 6mm concrete reinforcing mesh on 100mm grid centres;
- 75mm imported consolidated hardcore;
- 20mm imported gravel.

3.2.4 Additional Measures

Restrictive Covenants

All private residences in Fleet Mews are to have restrictive covenants applied to the property title prohibiting digging and the creation of garden borders on each property. The covenants will be transferrable in title and will remain with the property in perpetuity. Covenants are legally binding and enforceable by Court.

As part of the conveyancing process solicitors have a duty to advise prospective purchasers on restrictive covenants and contaminated land issues which will ensure purchasers at each conveyance will be made aware of the 'no-dig' policy.

The proposed restrictive covenant is as follows:

"Not without permission from South Holland District Council to excavate any soil, gravel, sand, hardcore or any other materials below the orange protective membrane in situ at the Property."

Future Development

The Fleet Mews area of the wider development Site is within a Conservation Area associated with the listed buildings Orchard House and Holbeach House to the south meaning any additional development proposals will require planning permission. It is understood there are no permitted development exclusions. Should future development be proposed it is anticipated that the LPA would condition any planning permission to require additional investigation, risk assessment and remediation as necessary.

Maintenance

All underground utilities within the central courtyard area are to be laid in dedicated service corridors backfilled with imported gravel.

All future maintenance of common areas and fencing is to be undertaken by the management company responsible for the wider development Site including Fleet Mews, Orchard House and Holbeach House areas. Details of the residual contamination issues are to be included in the Site Health & Safety File such that appropriate risk assessments and method statements can be developed as necessary prior to future intrusive works in order to be protective of the workforce, Site users and neighbours.

3.3 Imported Soils and Aggregates

Materials will need to be imported for ground improvement, foundation, pavement and drainage construction.

All imported aggregates (including virgin quarried material) will need to be validated as suitable for use based on generic assessment criteria (LQM/CIEH S4UL's) selected for their application – i.e. 'residential without homegrown produce' for gardens and 'POS resi' for common areas.

Soils are to be tested at a frequency and for determinands set out in YALPAG Verification Requirements for Cover Systems, Ver 3.4 November 2017, as set out in Table 3.3 below:

Table 3.3 Imported Materials Testing

Type of Imported Material	Frequency of Testing	Suite of Analysis
Virgin Quarried Material	1 or 2 depending on the type of stone utilised, to confirm the inert nature of the material.	Standard metals/metalloids (should include as a minimum As,Cd,Cr,CrVI,Cu,Hg,Ni,Pb,Se,Zn)
Crushed Hardcore, Stone, Brick	Minimum 1 per 1000m^3	Standard metals/metalloids (As above) PAH (16 USEPA speciation) Asbestos
Greenfield/ Manufactured Soils	Minimum 3 or 1 per 250m^3 (whichever is greater)	Standard metals/ metalloids (As above) PAH (16 USEPA speciation), TPH (LQM banded), Asbestos screen.

Brownfield/ Screened Soils	Minimum 6 or 1 per 100m^3 (whichever is greater)	Standard metals/ metalloids (As above) PAH (16 USEPA speciation) TPH (LQM banded), Asbestos screen. Any additional analysis dependant on the history of the donor site.

The following additional criteria will also be met;

- The source of any imported material shall be provided.
- If from different sources details of all should be provided.
- All imported material must comply with the required GAC.
- Testing must include analysis of all contaminants identified above.
- Laboratories shall be UKAS and MCERTS accredited.
- Certificate(s) shall be dated within the last 2 months and relate to batches of material being imported.
- All laboratory test certificates to be provided to the Environmental Consultant for inclusion in the Verification Report.

3.4 Health & Safety, Environmental Controls

It is understood that a CAR Risk Assessment has been prepared by the main contractor for the construction phase risks associated with asbestos.

Any other small risk posed by the soils on Site to ground workers can be adequately and economically mitigated by adopting best practice standards of personal hygiene with appropriate levels of personal protective equipment (PPE) provided and utilised, and toolbox talks should be given to ground workers prior to the commencement of works.

Odour control should not be required in the Construction Phase Plan as exposure of odourous soils are not anticipated.

Notwithstanding the precautions for asbestos, dust suppression is strongly recommended.

3.5 Other Development Considerations

3.5.1 Buried Water Supply

For new adoptable connections the Water Authority usually require analysis of soils in the areas where new supplies are to be installed in accordance with their in-house or UKWIR guidance. This guidance, as for most utilities companies, is based upon the UKWIR Assessment.

On the basis of analysis and observations to date Barrier Pipe (such as *Protecta-line* or similar approved) is not required.

3.5.2 Materials Management and Waste Disposal

Under the Duty of Care Regulations, the producer of the waste is also obliged to ensure that all wastes are disposed of appropriately.

The waste classification of the soils has not been formally undertaken as part of this investigation. Where it is proposed to discard soils from Site it is recommended that the chemical test results are forwarded to a waste disposal contractor or landfill operator to establish the waste classification. Comprehensive analysis has been undertaken to enable initial classification.

Any soils that cannot be accommodated on Site within the works are surplus to requirements and a 'waste' under the Regulations and should only be disposed at a facility or a Site licensed to accept the materials.

If after classification the surplus soils are to be deposited directly in an inert or hazardous landfill, then allowance should be made for Waste Acceptance Criteria (WAC) testing of the surplus materials to confirm compliance with the limits for these materials.

The Contractor is to retain all waste disposal dockets/duty of care certificates and provide them to the Environmental Consultant for inclusion in the Verification Report.

4.0 VERIFICATION REQUIREMENTS

4.1 Measures For Dealing With Unexpected Contamination

As with any brownfield development, there is a possibility that an unknown area of soil contamination may be encountered during excavation works. Should an area of contamination (different to that already known to be present) be identified by visual or olfactory means the following procedure will be followed:

- Immediately stop all works in the area where contamination is suspected;
- the LPA are notified in writing immediately on discovery of unexpected significant contamination;
- Immediately contact Environmental Consultant for advice;
- Environmental Consultant will judge each occurrence on merit and should it be deemed necessary the Environmental Consultant will attend Site to undertake further sampling and undertake risk assessment;
- If remediation is necessary oversee the removal or treatment of the 'hotspot' and collect validation samples;
- For hotspot removal (if applicable) any excavated material should be isolated from all other material at the Site and be disposed of to a suitably licensed facility. The Environmental Consultant should be supplied with Duty of Care Transfer Notes or Consignment Notes for all off-Site disposal;
- The excavation should remain open and safe until the validation has been completed;
- Any identified hot spot would need to be appropriately classified prior to disposal to landfill (or transferred to a treatment centre).

4.2 Verification Reporting

On completion of any necessary remediation activity at the Site, GDP will prepare a Remediation Verification Report for submission to the Local Authority to pursue the discharge of final land quality planning conditions. The report will be prepared in accordance with the requirements set out in YALPAG 'Development of Land Affected by Contamination' Ver 8.2 February 2017 and will summarise the works undertaken as described above and provide a detailed written and, where appropriate, photographic record including provision or supporting documentation provided by the contractor.

The Verification Report will include as a minimum the following information;

- Description of Remediation activity, including photographic evidence of depths of capping layers and any other remedial excavations or activities;
- As built drawings showing all areas where remediation activity has taken place;
- Full details of any other unexpected contamination encountered;
- Name of Contractors and subcontractors;
- Name of Supervising Environmental Consultants;
- Laboratory Certificates for Imported materials;
- Laboratory Certificates for any additional sampling and verification testing;
- Waste disposal dockets; and
- Verification photographs of clean cover systems in gardens and common areas.

5.0 LIMITATIONS

This document sets out the measures that will be performed to mitigate risks identified during the site characterisation and risk assessment process documented in the Environmental Assessment Report detailed in Section 1. In preparing the above reports GDP reviewed and interpreted information and data provided by a number of third party sources. GDP's conclusions, recommendations and proposed RMS are based upon this information. GDP does not warrant the accuracy of the information provided to it and is not responsible for any opinions expressed or conclusions drawn in reliance on information subsequently proven to be inaccurate.

The efficacy of the RMS proposed is dependent upon its complete and accurate implementation by the Client, its main contractor and their appointed subcontractors. GDP cannot accept liability for works undertaken or incompletely performed during its absence from site.

The contractor is to ensure it has all necessary consents, licences, agreements, permits and permissions to undertake the site works. GDP accepts no liability for prosecutions, enforcements or stop-notices or any associated legal or financial liability associated with works undertaken on site by the Main Contractor or his subcontractors. GDP limits all liability associated with the remediation on site to 5 times the value of this phase of the commission and for a period of 1 year from the date of the RMS.

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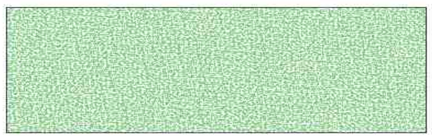
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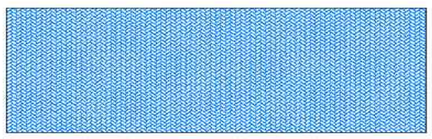
APPENDIX 1

LAYOUT PLAN AND CLEAN COVER SYSTEMS





"GRONO" ARTIFICAL TURF
50mm SAND
150mm CONSOLIDATED HARDCORE
6mm x100mm cts steel reinforcing mesh mid H/C
ORANGE COLOURED CONTAM GEOTEXTILE MEMBRANE
EXISTING SUB SOIL



BLOCK PAVIORS
25mm SAND
150mm CONSOLIDATED HARDCORE

EXISTING SUB SOIL



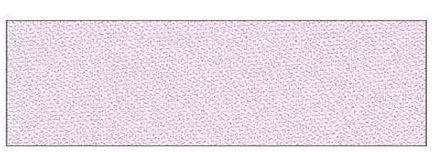
450 x 450mm PAVING SLABS
50mm SAND
150mm CONSOLIDATED HARDCORE
6 mm x 100mm cts steel reinforcing mesh mid H/C

ORANGE COLOURED CONTAM GEOTEXTILE MEMBRANE
EXISTING SUB SOIL



450 x 450mm PAVING SLABS
50mm SAND
150mm CONSOLIDATED HARDCORE

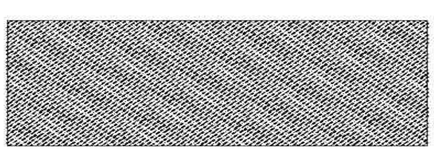
EXISTING SUB SOIL



75mm TARMAC

150mm CONSOLIDATED HARDCORE

EXISTING SUB SOIL



20mm GRAVEL
150mm CONSOLIDATED HARDCORE
6 mm x 100mm cts steel reinforcing mesh mid H/C
ORANGE COLOURED CONTAM GEOTEXTILE MEMBRANE

EXISTING SUB SOIL

Rev"C" 25/05/18 6 mm steel mesh added
Rev"B" 21/05/18 steel mesh added
Rev"A" 23/04/18 Plots 12 & 13 boundaries revised

NOTES :

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Client : INVICTA DEVELOPMENTS LTD

Job Title :
CONVERSION OF REDUNDANT HEALTH FACILITY

Drawing Title :
EXTERNAL WORKS

Site Address :
ORCHARD HOUSE
FLEET ROAD
HOLBEACH

Scale :	Date :	Drawn By :
1 : 250 / A1	127/04/2018	SRW

Drawing No. :	Revision :
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