

Materials Management Plan (MMP) Form - October 2014

This form should be completed once the lines of evidence have been marshalled in relation to suitability for use, certainty of use and quantity required.

The answers to the questions posed within this form, together with the supporting information will constitute the MMP and must be provided to the Qualified Person.

A Qualified Person may comment on draft versions of this MMP, but will not complete the Declaration until all the relevant documents, demonstrating lines of evidence have been provided for each site.

The person / organisation who will pay the Declaration fee should confirm that they have read and understand the Terms and Conditions relating to the payment of the Declaration fee to CL:AIRE. These can be found on the CL:AIRE website.

The person / organisation agreeing to pay the Declaration Fee - Name, organisation and contact details inc. email address -	Alex Preston, Tier Environmental Ltd Suite 414 Chadwick House Warrington Road Birchwood Park Warrington WA3 6AE Tel: 01925 818 388 Alex.Preston@tieruk.com Please invoice against PO 1992
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☐ I confirm I have read and understood the Terms & Conditions.

Each question must be answered. If the question is not applicable please state this and provide a brief explanation.

1. Specify the scenario to which this MMP relates, as described in the Definition of Waste: Development Industry Code of Practice (DoW CoP) (1, 2, 3 or 4):

- ☒ 1. Reuse on the Site of Origin
- ☐ 2. Direct Transfer of clean naturally occurring soil / mineral materials
- ☐ 3. Cluster Project
- ☐ 4. Combination of any of the above

In the case of a combination of reuse scenarios, please describe it below (e.g. (i) Reuse on Site of Origin and Direct Transfer of clean naturally occurring unpolluted soils, (ii) Reuse on the Site of Origin with Direct Transfer of clean naturally occurring soil to x number of development sites etc:

(NB: A Declaration is required for reuse on the Site of Origin and for any 2 site arrangement i.e. there is no facility for a combination Declaration)

2. Organisation and name of person preparing this MMP	Alex Preston, Tier Environmental Ltd, Chadwick House, Birchwood Park, Warrington, WA3 6AE Alex.preston@tieruk.com
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Document Control

Date issued	05/11/2020
Revision date 1	22/03/2022
Revision date 2	15/07/2022
Revision date 3	04/08/2022
Revision date 4	04/08/2022
Revision date 5	12/08/2022
Summary of revision 1	Planning permission granted and added contractor details and evidence of attempts to liaise with EA and LA.
Summary of revision 2	Update to include volumes generated from soft spot removal and evidence of attempts to liaise with EA and LA.
Summary of revision 3	Update to volumetrics based on new cut and fill model by The Land Trust and evidence of attempts to liaise with EA and LA.
Summary of revision 4	Update to include Phase 2 and evidence of attempts to liaise with EA and LA.
Summary of revision 5	Update contact details for landowner and latest revision of illustrative masterplan

Insert additional lines to the table above for any subsequent revisions.

Note - revisions to the MMP do not trigger an additional Declaration by a Qualified Person, unless an additional site is added to the project.

Revisions to the MMP must be recorded and summarised in the Document Control box above.

Site Details

3. Site / Project name(s)	Symmetry Park Merseyside Additions to Phase 1 and Phase 2
Reuse / receiving site name :	Symmetry Park Merseyside
Donor site name (if Direct Transfer)	

Landowners

4a. Name of Landowner(s) (full address and contact details) – where excavated materials are to be reused	Lee Charnley - lee.earnley@tritaxsymmetry.com Tritax Symmetry Merseyside 1 Limited c/o Tritax Symmetry, Grange Park Court, Roman Way, Northampton, NN4 5EA Sarah Palgrave-Neath - SarahPalgrave-Neath@thelandtrust.org.uk The Land Trust 1 Dewhurst Rd, Birchwood, Warrington WA3 7GB
4b. Name of Landowner(s) (full address and	Lee Charnley - lee.earnley@tritaxsymmetry.com

contact details) – where excavated materials are arising from	Tritax Symmetry Merseyside 1 Limited c/o Tritax Symmetry, Grange Park Court, Roman Way, Northampton, NN4 5EA
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Summary and objectives

5a. Provide a brief description of the planned project and how excavated materials are to be reused.	The proposed layout of the Site is presented in UMC Architects Drawing No. 21351 PO602 Rev R, which is appended to this report. At the time of writing the three proposed units are as follows: • Unit 01 – located in the eastern part of the site – 161,900ft²; • Unit 02 – located in the northern part of the Site – 152,212 ft²; • Unit 03 – located in the south-western part of the Site – 213,330 ft² This MMP is designed to provide information to allow re-use of material within the proposed hybrid planning application consisting of: Full application for the development of 164,400 sq. ft (15,273 sq. m) (GIA) of storage and distribution floorspace (Use Class B8), including ancillary offices (Use Class B1) and security gatehouse; site access road; engineering earthworks to form part country park; public car park to serve country park; footbridge over proposed site access road; and associated works; and, Outline application with details of point of access (details of part-access, landscaping, appearance, scale and layout are reserved) for the development of up to 835,600 sq. ft (77,629 sq. m) (GIA) of storage and distribution floorspace (Use Class B8), with ancillary offices and light industrial (Use Class B1); engineering earthworks to form country park and drainage attenuation ponds; pedestrian/cycle/equestrian route connecting existing M62 footbridge with proposed country park; and associated works. This Materials Management Plan (MMP) has been produced to document how materials that will be generated as part of the development works will be managed and re-used.
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	The MMP is aligned with the supporting information included within a Supplementary Risk Assessment Report (TE1163SRAL1.1) which has been produced to demonstrate that, based on the Conceptual Site Model for the Site and the results of laboratory chemical analysis, the materials are chemically suitable for re-use such that they demonstrably do not present a potentially significant risk to human health or controlled waters for the proposed land use. The main objectives of this MMP are to: 1. Describe how the materials can be safely re-used. 2. Provide details as to how the materials will be temporarily stored. 3. Provide details of the materials' final destination. 4. Provide details of how these materials will be tracked. This MMP has been prepared based on ground investigation information and design detail in accordance with CL:AIRE The definition of Waste: Development Industry Code of Practice, March 2011. All materials that are proposed to be re-used will facilitate ensuring the development is brought up to the required formation levels and provide an engineered development platform. Overall, it is envisaged that based on the cut and fill requirements and subject to being able to demonstrate geotechnical and chemical suitability for re-use, all materials on Site will remain on Site. Any additional materials encountered during construction which are deemed unsuitable for re-use or are surplus to requirements will be segregated and stockpiled separately prior to off-site disposal. Materials will be fully characterised and identified prior to leaving the site. All hauliers will be registered waste carriers and all loads will be accompanied by an appropriate waste transfer note. All final disposal sites will be identified before materials leave the site and their details recorded and maintained on site. Records of dates, quantities and types of material will be maintained on site. Proposed excavation and re use on the Site of Origin of 196,800m³ of materials chargeable under the DoW CoP, comprising 8,286m³ of reworked/made ground topsoil, 188,514m³ of made ground (predominantly comprising slightly sandy, very clayey angular to sub angular clods of clay & mixed natural lithologies. A low cobble content of angular to sub angular brick & granite with occasional fragments of metal, wood, plastic, rubber, natural lithologies & a low %age of ash), and an additional 16,698.45 m³ of soft silty clay materials excavated from a large soft spot within a former colliery
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	settlement lagoon located beneath Unit 1 (see drawing 'S023 – Soft Spot Survey' included in Appendix A). This material will be reused beneath the country park in the south-east of the wider site. This takes the total excavated material to 213,498.45m³ . An additional 50,194m³ of made ground will be generated, calculated using the initial cut of 272,115m³ and subtracting the Phase 2 wetlands cut volumetric (which will be accounted for within the phase 2 cut and fill calculations) of 39,615m³ to give 232,500m³, and then adding on the material to be generated from the site scrape of 14,494m³ to give a final volume of 246,994m³. When the original cut volumetric of 196,800m³ is subtracted from this, this gives an increase of 50,194 m³. This additional material has been generated due to changes in wetland levels, movement of the attenuation pond, changing of the profile of the mound, extension of the estate road and changes to levels around the brook diversion, as detailed in 'Rev2: New Design Model – mound and wetland', reference T10748/A0 Rev2 – Volumes, and Drawing No. T10748/A02 Rev B, both of which have been appended to this document. This takes the total excavated material to 263,692.45m³. Phase 2 – Proposed excavation and re use on the Site of Origin of an additional 292,590m³ of materials originating from the Phase 2 area, chargeable under the DoW CoP, comprising circa 46,874m³ of topsoil, 75,414.3m³ of made ground (predominantly comprising slightly sandy, very clayey angular to sub angular clods of clay & mixed natural lithologies. A low cobble content of angular to sub angular brick & granite with occasional fragments of metal, wood, plastic, rubber, natural lithologies & a low %age of ash), circa 112,714.3m³ of superficial deposits, and circa 57587.3m³ of weathered/non-weathered bedrock. This takes the total excavated material for both Phase 1 and 2 to 556,282.45 m³. The chargeable volume under the DOWCoP now being requested for declaration is therefore (556,282.45 m³ - 196,800m³) 359,482.45m³ It is noted that the former colliery ceased operation in 1990 with regrading works moving colliery spoil to create the current site levels undertaken in the 1990's. The site was then planted and turned into a country park site. Planning Permission granted on 7 May 2008 by Knowsley Metropolitan Borough Council to Application
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	ref. 07/00929/COU, to the Land Restoration Trust, for the change of use from Former Colliery Site to Informal Country Park (including associated access improvements) for the site of Cronton Colliery.
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General Plans and Schematics

6. <u>Attach</u> a location plan for the site(s) and a plan of the site(s) which identifies where different materials are to be excavated from, stockpile locations (if applicable), where materials are to be treated (if applicable) and where materials are to be reused.	Plan Document Reference(s): The anticipated requirements for levels are shown on cut and fill drawings in Appendix A with additional information on volumes described above.
7. <u>Attach</u> a schematic of proposed materials movement. Where there is only one source area and one placement area briefly describe it. For all other projects a schematic is required.	Description & Schematic Document Reference: Please refer to the cut and fill drawings included in the Appendices. This shows the areas of cut and fill across the Site.

Parties Involved and Consultation – if more than one party please provide additional details for them and identify the location that they will be working e.g. where a site is zoned

TBC for Phase 2	
8a. Main earthworks contractor(s) (full address and contact details) – Where excavated materials are to be reused	
8b. Main earthworks contractor(s) (full address and contact details) - Where excavated materials are arising from	
9. Treatment contractor(s) (full address and contact details) – for treatment on site of origin, or at a Hub site within a fixed STF / Cluster Project	N/A
10. Where wastes and materials are to be transported between sites, provide details of the transport contractor(s) (full address, contact details and waste carriers registration details (if applicable))	N/A
11. Provide Local Authority contact details (full address and named contacts) where excavated materials are to be reused	Planning (for application ref 20/00494/HYB and 22/00162/REM) Contact: Kevin Foster - (Planning Case Officer) Tel: 0151 443 2893 Email: kevin.foster@knowsley.gov.uk Planning (for Country Park application ref 20/00578/FUL)

	Contact: Clare Appleyard - (Planning Case Officer Email: clare.appleyard@knowsley.gov.uk Environmental Protection Contact: Ian Gaskell – Senior Officer Tel: 0151 443 4267 Email: ian.gaskell@knowsley.gov.uk
12a. For the site where materials are to be reused and for Hub Site locations provide Environment Agency contact details (full address and named contacts):	Environment Agency Richard Fairclough House Knutsford Road Latchford Warrington Cheshire WA4 1HT Contact: unknown Email: enquires@environment-agency.gov.uk Tel: 03708 506 506 & Contact: Stephen Bostock – The Waste Enquiries Helpdesk Team General Enquiries Tel: 03708 506506 Email: GMMCWasteEnquiries@environment-agency.gov.uk General email contact for Waste Team for Greater Manchester, Merseyside & Cheshire: GMMCWasteEnquiries@environment-agency.gov.uk

<i>For all Cluster Projects:</i> 12b. Attach any relevant documentation from the EA relating to the excavation and reuse of the materials to demonstrate no objection to the proposals (see 3.37 of DoW CoP) If the EA has not been consulted please explain why (see paragraph 3.39 of the DoW CoP).	EA references: N/A

Lines of Evidence

There is no one single factor that can be used to decide that a substance or object is waste, or when it is, at what point it ceases to be waste; as complete a picture as possible has to be created.

The following sections require completion to ensure the correct decision is made.

If a requested item is not relevant it is important to clearly state why this is so (e.g. no planning permission required because permitted development status exists).

Suitable for use criteria

13. Please describe or provide copies of the required specification(s) for the materials to be reused on each site.	Document Reference(s): It will be necessary to ensure that the development of the site does not cause an increased risk to receptors. As such, the Supplementary Risk Assessment Report has been undertaken to demonstrate that all materials are suitable chemically and, geotechnically for re-use. Supplementary Risk Assessment Letter Report for Symmetry Park, Huyton, Merseyside, (Doc. ref. TE 1163 SRA L01.1) dated 29 July 2021.
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Where contamination is suspected or known to be present 14a. Please provide copies of or relevant extracts from the risk assessment(s) that has been used to determine the specification for use on the site. This must relate to the place where materials are to be used. This must be in terms of (i) human health (ii) controlled waters and (iii) any other relevant receptors. If a risk assessment is not relevant for a particular	Document Reference(s): Sections 6 & 7.2 and Appendices D & E of Desk Study & Phase 1 Preliminary Risk Assessment for the Former Cronton Colliery Site, (Report ref. TE 1163 PRA1 Issue 1.2) dated 13 August 2020 by Tier Environmental Ltd. Sections 5, 8.2, 8.4, & 9 and Appendices H & I of Preliminary Ground Investigation for the Former Cronton Colliery, (Report ref. TE 1163 PGIR1 Issue1.2) dated 13 August 2020 by Tier Environmental Ltd. Sections 5, 8, 9.2, 9.3, 9.7 & 10 and Appendices F, G, H, I & O of Ground Investigation Report Issue 1.3 for Symmetry Park Merseyside, Huyton, (Report ref. TE 1163 GIR 1.3) dated 1 December 2021 by Tier Environmental Ltd. Supplementary Risk Assessment Letter Report for Symmetry Park, Huyton, Merseyside, (Doc. ref. TE
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receptor given the site setting please explain why below:	1163 SRA L01.1) dated 29 July 2021.
14b. Please attach any relevant documentation from the LA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)	LA Document references: Multiple attempts to liaise with the LA have been undertaken via email and telephone. No response has been received since November 2021. The lack of response (over 21 days) is considered to demonstrate no objection in this instance. In accordance with 3.37 of CoP. Evidence of these attempts to contact is provided in Appendix B. Emails from Tier Environmental (Tier) to Knowsley Council, dated 23 & 24 November 2021, attaching the Supplementary Risk (SRA) Letter Report for review and comment (for inclusion in the MMP) relating to the intention to use the DoW CoP, for this Site of Origin scenario. Follow up email from Tier to Knowsley Council (as no response received), dated 14 March 2022 requesting confirmation that the Council have no objection to the proposed re use of the material on the site under the DoWCoP (as detailed in the SRA, SI & Enabling Works Strategy. Email response dated 14 March 2022 from Knowsley Council to Tier stating they will look into it and respond soon, but nothing received to date. Letter (ref. 20/00494/DISCON) dated 8 June 2022 to Gerald Eve (Planning Consultant) stating part of condition 13 (MMP for phase 1) of planning permission 20/00494/HYB can be recommended for discharge subject to clarification of watching brief. Revision 2, 15 July 2022 – still no response from Knowsley Council Revision 3a, 4 August 2022 – still no response from Knowsley Council Revision 3b, 4 August 2022 – still no response from Knowsley Council
14c. Please attach any relevant documentation from the EA relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 and Table 2 of the CoP)	EA Document references: Multiple attempts to liaise with the EA have been undertaken via email and telephone. No response has been received since November 2021. The lack of response (over 21 days) is considered to demonstrate no objection in this instance. In accordance with 3.37 of CoP. Evidence of these attempts to contact is provided in Appendix B. Initial email from Tier Environmental (Tier) to EA enquiries dated 23 November 2021, attaching the

	Supplementary Risk (SRA) Letter Report, requesting it be forwarded to the Local EA waste team for the Knowsley area for review and comment (for inclusion in the MMP) relating to the intention to use the DoW CoP for this Site of Origin scenario. This was forwarded to the GMMC Waste Team on 24 November 2021. GMMC Waste enquiries response email dated 13 December 2021 to Tier stated that as the EA had not yet discharged all conditions through the planning process, they were not able to support the application until they had all been resolved. Further emails from Tier to the EA Waste dated 13 & 14 December 2021 seeking clarification and if the SRA had been reviewed as it answered the queries raised. Email from EA Waste to Tier dated 23 December 2021 and response email of same date from Tier reaffirming all EA comments answered in SI Report & Enabling Works Strategy and further monitoring undertaken as requested. Email dated 11 March 2022 from Tier to EA Waste requesting response to the use of the DoWCoP as planning permission to Hybrid Application ref. 20/00494/HYB was granted by Knowsley Council on 4 March 2022 Revision 2, 15 July 2022 – still no response from EA Revision 3a, 4 August 2022 – still no response from EA Revision 3b, 4 August 2022 – still no response from EA
14d. Please attach any relevant documentation from any other regulators (if relevant) relating to the excavation and reuse of the materials to demonstrate no objection (see 3.37 of the CoP)	Document Reference(s): N/A
Where contamination is not suspected	Document Reference(s) N/A

15a. Please attach copies or relevant extracts from the Desk Top Study that demonstrates that there is no suspicion of contamination.	
15b. Please attach copies of or relevant extracts from the site investigation/testing reports that adequately characterise the clean materials to be used (if appropriate).	Document Reference(s) See the following sections in the Supplementary Risk Assessment Report: • Human Health Risk Assessment; and, • Controlled Waters Risk Assessment. Supplementary Risk Assessment Letter Report for Symmetry Park, Huyton, Merseyside, (Doc. ref. TE 1163 SRA L01.1) dated 29 July 2021.
15c. Please attach copies of any other relevant information (if available) confirming that land contamination is not an issue.	Document Reference(s) N/A

NB: It is your responsibility to assess the nature of the material to be used and that it fits within the limitations of the scenario under which it is to be used

Certainty of use

Various lines of evidence are required to demonstrate that the materials are certain to be used. This includes:

- The production of this MMP
- An appropriate planning permission (or conditions that link with the reuse of the said materials)

- An agreed Remediation Strategy(ies)
- An agreed Design Statement(s)
- Details of the contractual arrangements

Please identify in the following sections what lines of evidence relate to the site(s) **where the materials are to be used**.

16a. Planning Permission(s) relating to the site where materials are to be reused Please provide a copy of the relevant planning permission	Document Reference: 20/00494/HYB (granted 4 March 2022), 22/00162/REM (validated 15 March 2022, decision still pending) & 20/00578/FUL (validated 9 November 2020, decision still pending) Attached within Appendix C
16b. Explain how the reuse of the excavated materials fits within the planning permission(s) for each site.	Please see Supplementary Risk Assessment Letter Report for Symmetry Park, Huyton, Merseyside, (Doc. ref. TE 1163 SRA L01.1) dated 29 July 2021.
16c. If planning permission is not required for any one site please explain why below e.g. permitted development, clean up of a chemical spill, surrender of an Environmental Permit, re-contouring within the existing permission.	

Where contamination is suspected or is	Document Reference(s):
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known to be present 17. Please provide a copy of any Remediation Strategy(ies) that have been agreed with relevant regulators.	Tier Environmental Enabling Works Strategy (TE1163EWS1.0) dated 6 April 2021 Asbestos Risk Assessment (TE1163ARA)
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Where contamination is not suspected 18. Please provide a copy of any Design Statement(s) that have been agreed (e.g. with the planning authority or in the case of permitted developments the client).	Document Reference(s): N/A
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Quantity of Use

19. Please provide a breakdown of the excavated materials for each site and how much will be placed at each site or sub area of each site. Where this is not specific to a single readily	Document Reference(s): See 'Proposed Materials Management' Section in the SRA Letter Report and cut and fill drawings included in Appendix of the same document Proposed excavation and re use on the Site of Origin of 196,800m³ of materials chargeable under the
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identifiable source refer to an annotated plan, schematic or attach a tabulated summary.	DoW CoP, comprising 8,286m³ of reworked/made ground topsoil, 188,514m³ of made ground. (predominantly comprising slightly sandy, very clayey angular to sub angular clods of clay & mixed natural lithologies. A low cobble content of angular to sub angular brick & granite with occasional fragments of metal, wood, plastic, rubber, natural lithologies & a low %age of ash), and an additional 16,698.45 m³ of soft silty clay materials excavated from a large soft spot within a former colliery settlement lagoon located beneath Unit 1 (see drawing 'SO23 – Soft Spot Survey' included in Appendix A). This material will be reused beneath the country park in the south-east of the wider site. This takes the total excavated material to 213,498.45m³ An additional 50,194m³ of made ground will be generated, calculated using the initial cut of 272,115m³ and subtracting the Phase 2 wetlands cut volumetric (which will be accounted for within the Phase 2 cut and fill calculations) of 39,615m³ to give 232,500m³, and then adding on the material to be generated from the site scrape of 14,494m³ to give a final volume of 246,994m³. When the original cut volumetric of 196,800m³ is subtracted from this, this gives an increase of 50,194 m³. This additional material has been generated due to changes in wetland levels, movement of the attenuation pond, changing of the profile of the mound, extension of the estate road and changes to levels around the brook diversion, as detailed in 'Rev2: New Design Model – mound and wetland', reference T10748/A0 Rev2 – Volumes, and Drawing No. T10748/A02 Rev B, both of which have been appended to this document. This takes the total excavated material to 263,692.45m³. Phase 2 – Proposed excavation and re use on the Site of Origin of an additional 292,590m³ of materials originating from the Phase 2 area, chargeable under the DoW CoP, comprising circa 46,874m³ of topsoil, 75,414.3m³ of made ground (predominantly comprising slightly sandy, very clayey angular to sub angular clods of clay & mixed natural lithologies. A low cobble content of angular to sub angular brick & granite with occasional fragments of metal, wood, plastic, rubber, natural lithologies & a low %age of ash), circa 112,714.3m³ of superficial deposits, and circa 57587.3m³ of weathered/non-weathered bedrock. This takes the total excavated material for both Phase 1 and 2 to 556,282.45 m³. The chargeable volume under the DOWCoP now being requested for declaration is therefore (556,282.45 m³ - 196,800m³) 359,482.45m³
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20a. How has consolidation/compaction being considered in the above mass balance calculations?	The re-use material is predominately generally granular. The assumption, therefore, is that there may be some bulking factor but that this will be compensated by the reinstatement in fill areas in controlled engineered layers.
20b. How has loss due to treatment being considered in the above mass balance calculations (if applicable)?	Overall, any losses from unsuitable materials will still result in a net excess of materials (a greater volume than the fill requirements) – this therefore provides a ‘buffer’ to ensure that there will not be a deficit of materials for fill operations on site.
20c. How has the addition of treatment materials being considered in the above mass balance calculations (if applicable)? Note - An exact figure is not required but one that is reasonable in the circumstances and can be justified if challenged.	It is acknowledged that the greatest uncertainty for fill calculations is the resulting void that will result from partial grubbing up of any relict unidentified structures a best estimate has been made based on site investigation reporting.

Contingency arrangements

Explain what is to happen in the following situations and **identify the appropriate clauses** in the contract(s) (Such clauses must be provided to the Qualified Person, preferably as a summary document): or

21a. What is to happen to, and who is to pay for out of specification materials?	Reference: Tritax Symmetry Ltd 4th Floor Victoria Buildings Albert Square
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	1-7 Princess Street Manchester M2 4DF
21b. What is to happen to, and who is to pay for any excess materials?	Reference: Tritax Symmetry Ltd 4 th Floor Victoria Buildings Albert Square 1-7 Princess Street Manchester M2 4DF
21c. What happens if the project programme slips in relation to excavated materials or materials under -going treatment?	Reference: We would inform Claire of any changes in programme and amend the proposed verification reporting date.
21d. Other identified risk scenarios for the project (relating to excavated materials)?	Reference: The Control of Asbestos Regulations 2012 will be adhered to whilst working the vicinity of low level asbestos impacted soils

The Tracking System

Where contamination is suspected or known to be present, state the procedures put in place to:

22a. For all sites please describe the tracking system to be employed to monitor	Cut and fill proposals will be monitored during earthworks. A tracking sheet proforma is provided within Appendix C.
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materials movements.	
Where contamination is suspected or known to be present, state the procedures put in place to: 22b. Prevent contaminants not suitable for the treatment process being accepted	No treatment is planned as part of the MMP.
Where contamination is suspected or known to be present, state the procedures put in place to: 22c. Prevent cross contamination of materials not in need of treatment, wastes awaiting treatment and treated materials	Segregation of populations of soil which are considered unsuitable for re-use away from any materials which are suitable for re-use. A watching brief will include independent verification of suitable segregation of the materials prior to subsequent placement of the materials in accordance with the SRA. Any imported topsoil/subsoil/other imported materials will be brought on to site and will clearly stockpiled separately from any materials being re-used on Site. The tracking system and surveying of materials will ensure that should any materials be deemed unsuitable, it will be possible to determine where the materials are on Site and ensure that they are not mixed with any other materials until such a decision can be made to ensure their suitable placement or disposal from Site. Watching brief by a suitably trained geo-environmental engineer to monitor and record these procedures.
Where contamination is suspected or known to be present, state the procedures put in place to: 22d. Demonstrate that materials that do not require treatment and successfully treated materials reach their specific destination	Imported materials will be brought on to site and will clearly stockpiled separately from any materials being re-used on Site. Watching brief by a suitably trained geo-environmental engineer to monitor and record these procedures.
Where contamination is suspected or known to be present, state the procedures put in place to:	Material disposed off site will be assessed for hazardous properties and will be subject to WAC testing to determine the appropriate disposal route. The frequency of testing will be determined at the time, dependent on the quantity and consistency of materials requiring disposal and its location with respect

22e. Ensure that waste for off-site disposal or treatment is properly characterised and goes to the correct facility	to previous and existing soil sampling information. It is noted that it is proposed to retain all materials on site.
23. Please attach a copy of the tracking forms / control sheets that are to be used to monitor materials movements. To include transfer of loads on site into stockpiles prior to treatment (if applicable), stockpiled after treatment (if applicable), stockpiled awaiting use (as appropriate) and final placement.	Document reference(s) Tracking sheet proforma provided within Appendix C. Site logs to be made in engineer's notebook. Estimations of volumes will be made during earthworks. A part-time watching brief by a suitably trained geo-environmental engineer will be undertaken to record materials movements on regular basis and liaison with the site surveyor to produce a drawing showing the zones/areas where specific materials have been placed. Earthworks contractor will be undertaking regular survey works to ensure that materials volumes and formation levels are being achieved in accordance with the original cut and fill specification drawings. Any variations will be assessed throughout the project and the total volume of materials.
<i>For Hub Sites within Cluster Projects & where materials need treatment before reuse</i> 24. Please attach a copy of the Environmental Permit covering the treatment process. Alternatively if the treatment is covered by a	Permit reference / EA letter reference: N/A

Mobile Plant Permit and associated Deployment Form, attach a copy of the EA agreement to the Deployment Form.	
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Records

25. Where, and in what form, are records to be kept? Note – records e.g. transfer notes, delivery tickets, Desk Top Study, Site Investigation, Risk Assessment(s), Verification Report(s) need to be kept for at least 2 years after the completion of the works and production of the Verification Report	Records such as tracking forms, transfer notes, site investigation, verification report, etc will be kept in electronic and paper formats. They will originally be stored on site and then taken and stored for a minimum of 2 years. Tier Environmental will be producing the verification report. Persons responsible – Alex Preston. Alex.preston@tieruk.com
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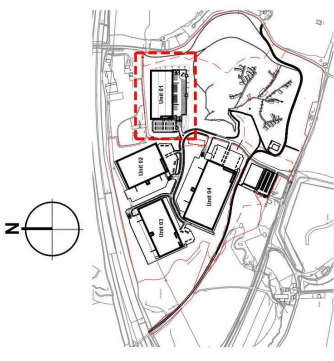
Verification Plan

26. Provide or explain the Verification Plan which sets out how you will record the placement of materials and prove that excavated materials have been reused in the correct location and in the correct	Document Reference The Supplementary Risk Assessment Letter Report and the sections above detail how the materials will be visually segregated and placed in accordance with the cut and fill drawing. Post earthworks, a verification report will be produced that will include, but not limited to: • A description of the works undertaken; • Records of the works; • Progress photographs;
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quantities within the development works (see 3.4 of the DoW CoP).	• Waste Transfer Notes (if applicable); • A statement that the works Verification plan detailed in Sections 4.1, 4.3, 4.5, 4.6, 4.8, 4.9, 4.11 & 4.14 and Appendices D & E of Enabling Works Strategy and Verification Plan for Symmetry Park Merseyside, Huyton, (Report ref. TE 1163 EWS FINAL) dated 6 April 2021 by Tier Environmental Ltd. Proposed Verification report date 31st December 2023.
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APPENDIX A - DRAWINGS

Drawings are to be reviewed, revised and approved. The following notes apply to the drawings and should be read in conjunction with the drawings. - Drawing of the site plan is to be reviewed, revised and approved. - The site plan is to be reviewed, revised and approved. - The site plan is to be reviewed, revised and approved.



Key Plan
Scale 1:10000

SCHEDULE OF ACCOMMODATION
(Gross Internal Area)

Unit 01	
Warehouse Area	153,100 sq ft (14,222m ²)
Office Area	15,000 sq ft (1,396m ²)
Garagehouse	300 sq ft (28m ²)
Total Area	
	161,500 sq ft (15,041m ²)
Loading Docks	15
Level Access	4
HGV Parking	37
Car Parking	154 (Inc. 8 No. Acc + 8 EV)
Motorcycle Parking	8

- Application Boundary
- F/E
- Future Electrical Car Charging Spaces

by: [signature] date: [date]

Symmetry Park, Merseyside

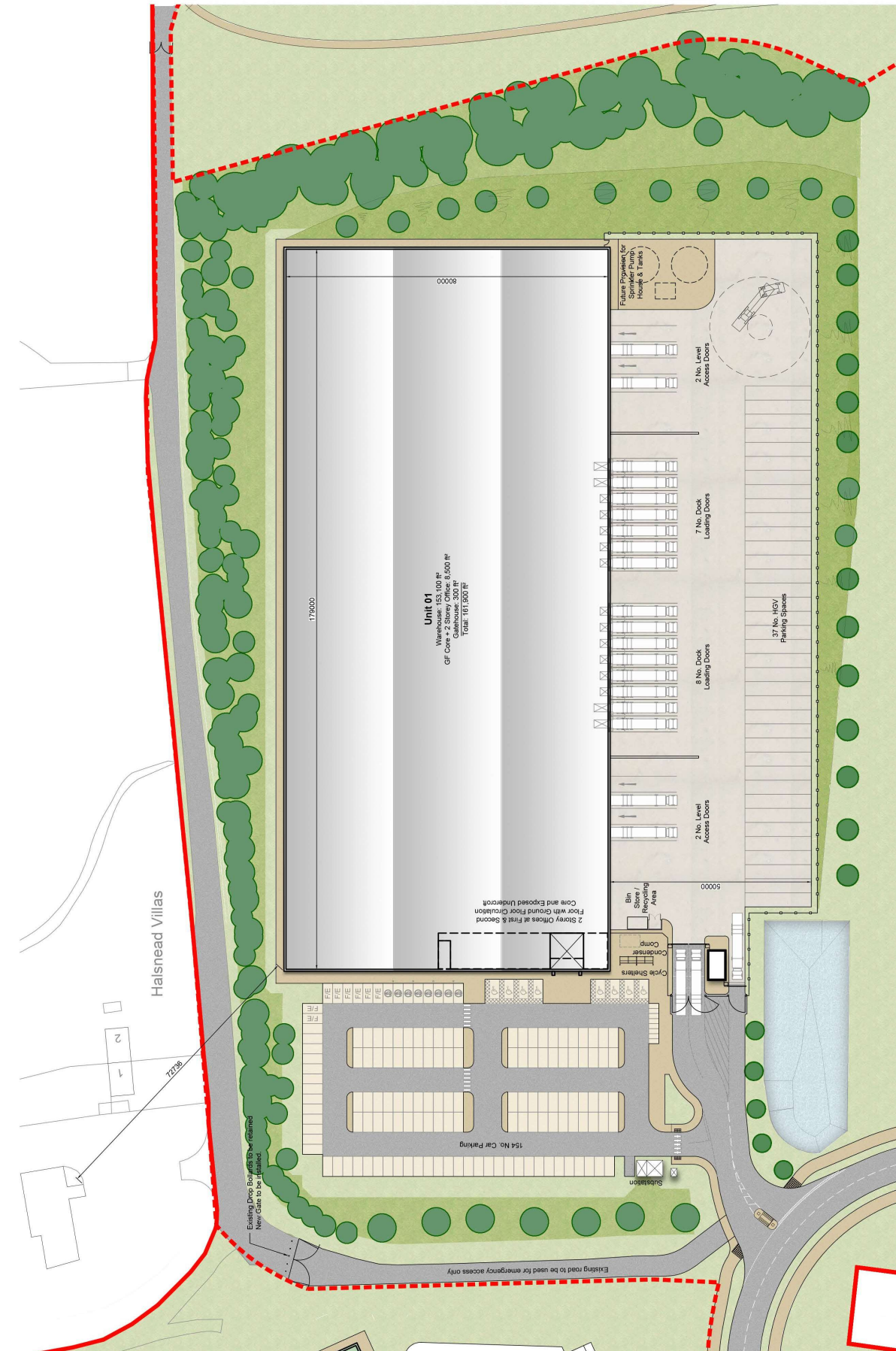
Unit 01 Site Plan

TRITAX SYMMETRY
A TRITAX BIG BOX COMPANY

umc architects

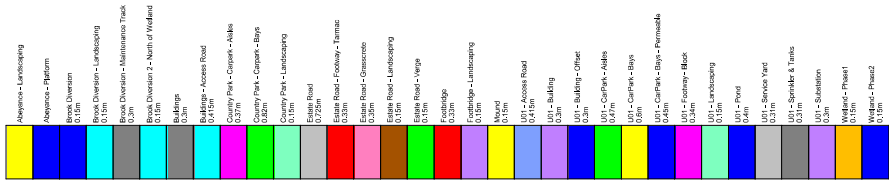
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Drawn:	M. [signature]
Checked:	03/02/2020
Date:	As Noted
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Drawing No:	18128
Revision:	P0400
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PLANNING
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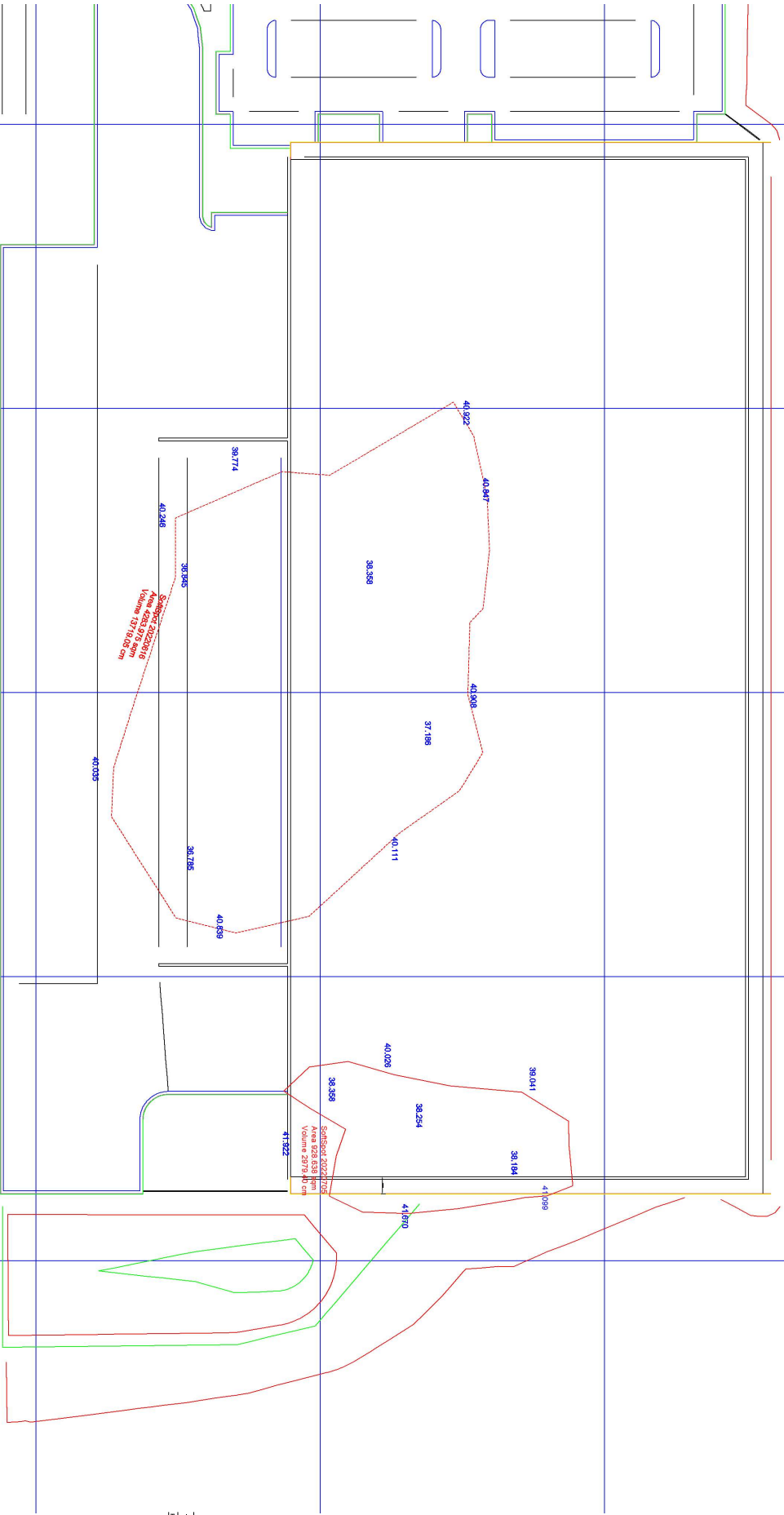
Unit 01 Site Plan
Scale 1:500

SCALE 1:500
10m
100m
SCALE 1:10000



B	New model revised 26.04.22	SD	WAO
A	Mound, wetland, estate road updated	SD	WAO
	Construction depths removed for Country Club areas.		
REV	COMMENT	DATE	DR BIRTH DATE
			
T: 0151 339 8113 www.dnroogang.co.uk			
CLIENT	Tribal Symmetry		
PROJECT TITLE	Symmetry Park, Monseyade		
Phase 1			
DRAWING TITLE			
Design Layout			
-			
-			
-			
DTM			
SCALE	1:1250	PAPER SIZE A1	SURVEYED
DATE	14.03.22	DRAWN	-
DATE OF SURVEY	14.03.22	CHECK	SD
DRAWING NUMBER T10748/A02		REV B	

Design Summary									
Group	Fill Volume	Cut Volume	Balance Volume	Fill Area	Cut Area	Combined Area	Fill Depth	Cut Depth	Group Depth
Abeyance - Landscaping	169	287	-119	264	427	691	0.639	0.672	0.000
Abeyance - Platform	485	2,129	-1,645	1,529	3,395	4,924	0.317	0.627	0.000
	653	2,417	-1,763	1,793	3,822	5,615			
Brook Diversion	0	1,366	-1,366	0	621	621	0.010	2.202	0.150
Brook Diversion - Landscaping	678	4,244	-3,566	656	3,516	4,171	1.034	1.207	0.150
Brook Diversion - Maintenance Track	0	244	-244	0	158	158	0.000	1.544	0.300
Brook Diversion 2 - North of Wetland	519	515	4	1,757	1,610	3,367	0.295	0.320	0.150
	1,197	6,368	-5,172	2,412	5,904	8,316			
Country Park - Carpark - Aisles	0	1,413	-1,413	18	3,369	3,388	0.020	0.419	0.370
Country Park - Carpark - Bays	0	1,804	-1,804	0	1,863	1,863	0.000	0.968	0.820
Country Park - Landscaping	0	10	-10	11	66	76	0.040	0.159	0.150
	1	3,227	-3,226	29	5,297	5,326			
Buildings	859	141	718	755	431	1,186	1.137	0.327	0.300
Buildings - Access Road	225	4	221	285	52	337	0.790	0.084	0.415
Estate Road	1,066	6,718	-5,651	1,439	4,562	6,000	0.741	1.473	0.725
Estate Road - Footway - Tarmac	621	1,229	-608	733	1,053	1,785	0.848	1.167	0.330
Estate Road - Grasscrete	8	317	-308	25	136	161	0.323	2.331	0.350
Estate Road - Landscaping	1,295	1,761	-466	1,227	2,105	3,332	1.055	0.837	0.150
Estate Road - Verge	385	305	79	376	312	687	1.024	0.980	0.150
	4,459	10,474	-6,015	4,840	8,649	13,489			
Footbridge	3,359	0	3,359	1,226	0	1,226	2.741	0.000	0.330
Footbridge - Landscaping	6,019	39	5,980	2,384	135	2,519	2.525	0.287	0.150
	9,378	39	9,340	3,609	135	3,744			
Mound	316,922	7,258	309,664	55,067	8,619	63,686	5.871	0.842	0.150
U01 - Access Road	121	2,428	-2,307	174	767	941	0.697	3.165	0.415
U01 - Building	1	68,522	-68,521	8	14,312	14,320	0.112	4.788	0.300
U01 - Building - Offset	22	2,541	-2,519	59	993	1,052	0.374	2.559	0.300
U01 - CarPark - Aisles	4	6,187	-6,183	9	1,989	1,999	0.395	3.110	0.470
U01 - CarPark - Bays	0	1,726	-1,726	0	411	411	0.000	4.202	0.600
U01 - CarPark - Bays - Permeable	0	5,320	-5,320	0	1,848	1,848	0.000	2.879	0.450
U01 - Footway - Block	10	2,021	-2,011	16	584	600	0.627	3.462	0.340
U01 - Landscaping	1,127	14,166	-13,039	1,206	6,005	7,210	0.935	2.359	0.150
U01 - Pond	0	10,062	-10,062	0	1,142	1,142	0.000	8.815	0.400
U01 - Service Yard	0	58,577	-58,577	1	8,248	8,249	0.121	7.102	0.310
U01 - Sprinkler & Tanks	0	2,866	-2,866	0	441	441	0.000	6.492	0.310
U01 - Substation	0	27	-27	0	29	29	0.000	0.937	0.300
	1,285	174,444	-173,159	1,473	36,769	38,242			
Wetland - Phase1	3,089	28,274	-25,186	4,790	25,398	30,188	0.645	1.113	0.150
Wetland - Phase2	3,313	39,615	-36,301	4,996	35,020	40,016	0.663	1.131	0.150
	6,402	67,889	-61,487	9,786	60,418	70,204			
Total	340,296	272,115	68,181	79,009	129,613	208,622			
Volumes from OGL (in addition to above)									
Site Scrape		14,494		(based on 100mm across the site excluding mound area)					
Notes									
Design levels 'ACAD-L005-TIE-ZZ-XX-DR-C-6007, 6015 & 6016 - Country Park Levels NOT PLOTTED WITH NEW NUMBERS-Model.dwg'.									
Topo levels 'L005- GMI Pre start level survey.dwg'. Levels from Lidar survey used to fill any gaps ('sj4789_DTM_1M')									
Levels interpolated to complete design model for road centreline and footpath.									
Kerb working room allowed for behind channel (500mm).									
No allowance in volumes above for site arisings.									
Construction buildups need to be confirmed.									



REV	COMMENT	CHK	BY

New Hey, Chester Road, Great Sutton
Ellesmere Port, Cheshire, CH60 2LS
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www.dinogroup.co.uk

CLIENT
GMI

PROJECT TITLE
Symmetry Park

DRAWING TITLE
Soil Spots volume

DATE
06/07/2022

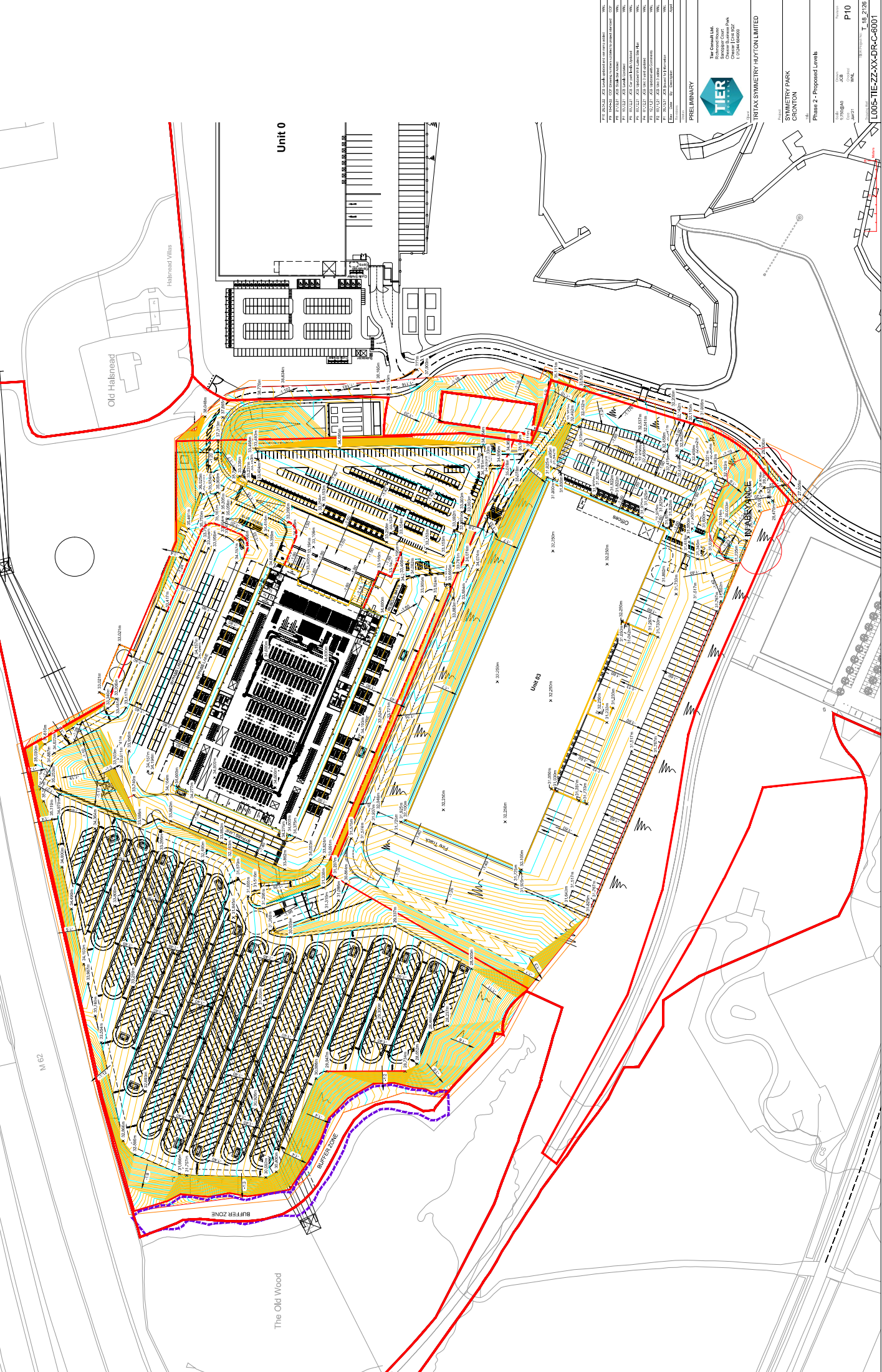
SCALE
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DATE OF SURVEY
05/07/2022

DRAWING NUMBER
S023 - Soil Spots Survey

Rev. 25

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PRELIMINARY
Symmetry Park
CRONTON
Phase 2 - Proposed Levels
P10
T: 016 27 106
U005-1E-ZZ-XX-DR-C-6001



NOTES

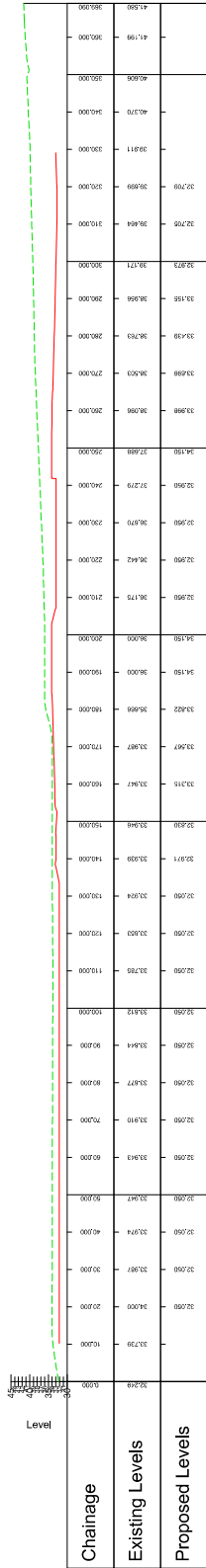
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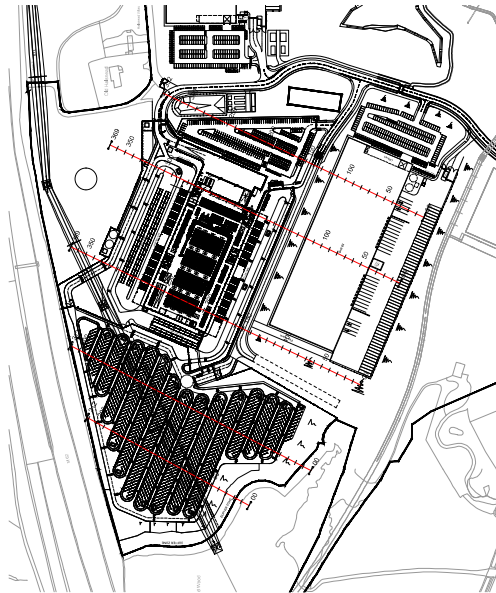
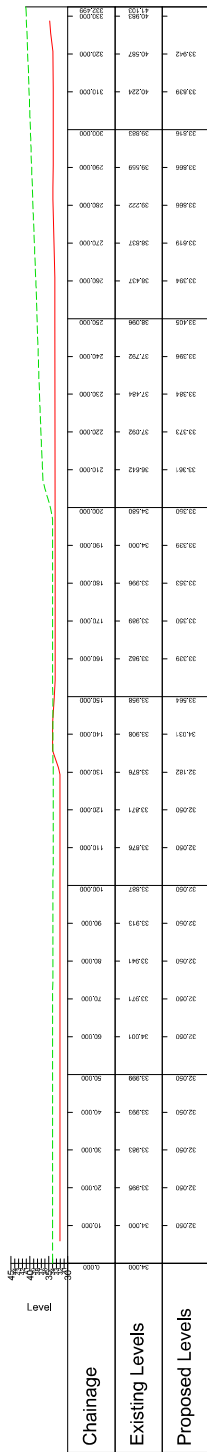
PRELIMINARY

Tier Consult Ltd.
11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 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1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 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2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092,

SITE SECTION 4 - LONGSECTION
SSCALE: H 1:500, V 1:500. DATUM: 30.000



SITE SECTION 5 - LONGSECTION
SCALE: H 1:500, V 1:500. DATUM: 30.000



Drawings are to be used for reference only and are not to be used for construction.
- Scaling of this drawing is not recommended.
- All dimensions are given in feet and inches.
- All dimensions should be rounded up to the nearest whole number.
- All dimensions should be rounded up to the nearest whole number.



SCHEDULE OF ACCOMMODATION
(Gross Internal Area unless otherwise stated)

Unit 01	
Warehouse Area	- 153,100 sq ft (14,223m ²)
Office (2 storey)	- 8,500 sq ft (780m ²)
Gatehouse	- 300 sq ft (28m ²)
Total Area	- 161,900 sq ft (15,041m²)
Net Site Area	- 7.03 Acres (3,209 Hectares)
Unit 02	
Warehouse Area	- 124,172 sq ft (11,539m ²)
FF GIA Area	- 28,040 sq ft (2,605m ²)
Total GIA Area	- 152,212 sq ft (14,144m²)
Net Site Area	- 24.85 Acres (10,058 Hectares)
Loading Docks	- 9
Level Access	- 14
Van Dock Doors	- 2
Compressor and Cider	- 1
Car Parking	- 244 (Inc. 2 No. Appt. 122 No. EV)
Unit 03	
Warehouse Area	- 198,723 sq ft (18,462m ²)
Office (Inc. Voids)	- 5,274 sq ft (490m ²)
SF Office (Excl. Voids)	- 5,500 sq ft (511m ²)
Transport Office (2 St.)	- 2,300 sq ft (213m ²)
Gatehouse	- 300 sq ft (28m ²)
Car Parking	- 189 (Inc. 15 No. Appt. + 9 No. EV)
Total Area	- 213,339 sq ft (19,919m²)
Net Site Area	- 9.86 Acres (3.99 Hectares)

- Masterplan Boundary
- Existing Overhead Power Lines
- Application Boundary
- 15m Wood Offset Zone
- TPO Woodland
- Woodland Retention



Phase 2, Symmetry Park,
Merseyside
Illustrative Masterplan

Rev: 01
Date: 13/11/2020

PLANNING
THIS DRAWING IS FOR PLANNING CONSIDERATION ONLY
AND SHOULD NOT BE USED FOR ANY OTHER PURPOSE

TRITAX SYMMETRY
A TRITAX BIG BOX COMPANY

umc architects

Planning	Rev: 01
Drawn by	13/11/2020
Scale	1:2000 @ A1
Drawing No.	21351
Revision	R

APPENDIX B – EMAIL CORRESPONDENCE

From: [Alex Preston](#)
To: ian.gaskell@knowsley.gov.uk
Subject: 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley
Date: 23 November 2021 12:12:00
Attachments: [TE1163SRA1.1.pdf](#)

Ian,

I hope you are well. You previously reviewed some of our reports in regards to the above site, are you still dealing with this site?. Please find attached a Supplementary Risk Assessment (SRA) Letter Report for review for the site.

It is intended that this standalone letter SRA report will act as supporting evidence for a Materials Management Plan to demonstrate suitability of use of materials on Site.

It would be appreciated if you could review the document and provide a formal response for inclusion in my MMP. Please note that we also intend for a review to be undertaken by the Environment Agency (with regards to controlled waters).

If you have any queries relating to the above, please do not hesitate to contact me.

Kind regards,

From: [Alex Preston](#)
To: [GMMCWasteEnquiries](#) [GMMCWasteEnquiries](#); [Adrian Read](#); [Sean Lee](#)
Subject: Re: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley
Date: 11 March 2022 10:26:43
Attachments: [image108682.png](#)
[image087761.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Stephen,

Notwithstanding your objection for planning reasons below. Could you confirm you have no objections to the re-use of materials at the site in principle under DoWCoP?

Further to this, the planning has been granted this week we understand all issues have been resolved. We are hoping to start on site within the next few weeks.

Your assistance in this matter is appreciated.

Kind regards,

From: GMMCWasteEnquiries GMMCWasteEnquiries <GMMCWasteEnquiries@environment-agency.gov.uk>

Sent: Monday, December 13, 2021 3:47:54 PM

To: Alex Preston <Alex.preston@tieruk.com>

Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good Afternoon Alex

We have the following comment to make:

We have not yet discharged all conditions through the planning process and since this is a particularly complex site with a history of issues caused by soil heaves causing issues to the nearby watercourse we cannot support this application until all these issues are resolved through the formal planning process.

Kind regards

[Stephen Bostock](#)

The Waste Enquiries Helpdesk Team

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

GMMCWasteEnquiries@environment-agency.gov.uk

Environment incident hotline (24/7) | 0800 80 70 60

General Enquiries | 03708 506 506

From: Enquiries, Unit

Sent: 24 November 2021 13:00

To: 'Alex.preston@tieruk.com' <Alex.preston@tieruk.com>

Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good afternoon

I have forwarded your email with attachment to the local EPR waste team.

Kind regards

Eileen Roffe
Customer Adviser
National Customer Contact Centre
Operations: Regulation, Monitoring and Customer
Environment Agency
☎ Tel: 03708 506 506
💻 Web Site: www.gov.uk/environment-agency

Click an icon to keep in touch with us:-



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<http://www.smartsurvey.co.uk/s/NCCCcustomer/>

From: Alex Preston [<mailto:Alex.preston@tieruk.com>]

Sent: 23 November 2021 12:09

To: Enquiries, Unit <enquiries@environment-agency.gov.uk>

Cc: Sean Lee <sean.lee@tieruk.com>

Subject: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

To Whom It May Concern,

Please find attached a Supplementary Risk Assessment (SRA) Letter Report for review for the above site.
Please can this email be forwarded to the local waste team that covers the Knowsley area.

It is intended that this standalone letter SRA report will act as supporting evidence for a Materials Management Plan to demonstrate suitability of use of materials both on Site (in a 'Site of Origin' scenario).

It would be appreciated if you could review of the document and provide a formal response for inclusion in my MMP. Please note that we also intend for a review to be undertaken by the Local Authority (with regards to human health risk).

If you have any queries relating to the above, please do not hesitate to contact me.

Kind regards,



Alex Preston

Senior Geoenvironmental Engineer | Tier Environmental

Suite 414, Chadwick House, Warrington Road, Birchwood Park, WA3 6AE

t: [01925 818 388](tel:01925818388) | m: [07879 338 750](tel:07879338750) | e: Alex.preston@tieruk.com | w: tierconsult.com



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From: [Alex Preston](#)
To: [GMMCWasteEnquiries](#) [GMMCWasteEnquiries](#)
Subject: Re: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley
Date: 13 December 2021 17:49:04
Attachments: [image108682.png](#)
[image087761.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Stephen,

Could you confirm which planning condition Has not been discharged?

Thanks

From: GMMCWasteEnquiries GMMCWasteEnquiries <GMMCWasteEnquiries@environment-agency.gov.uk>
Sent: Monday, December 13, 2021 3:47:54 PM
To: Alex Preston <Alex.preston@tieruk.com>
Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good Afternoon Alex

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We have not yet discharged all conditions through the planning process and since this is a particularly complex site with a history of issues caused by soil heals causing issues to the nearby watercourse we cannot support this application until all these issues are resolved through the formal planning process.

Kind regards

Stephen Bostock

The Waste Enquiries Helpdesk Team

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

GMMCWasteEnquiries@environment-agency.gov.uk

Environment incident hotline (24/7) | 0800 80 70 60

General Enquiries | 03708 506 506

From: Enquiries, Unit
Sent: 24 November 2021 13:00
To: 'Alex.preston@tieruk.com' <Alex.preston@tieruk.com>
Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good afternoon

I have forwarded your email with attachment to the local EPR waste team.

Kind regards

Eileen Roffe
Customer Adviser
National Customer Contact Centre
Operations: Regulation, Monitoring and Customer
Environment Agency
☎ Tel: 03708 506 506
🌐 Web Site: www.gov.uk/environment-agency

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Our National Customer Contact Centre relies on customer feedback, so we really value your thoughts on how we are doing. We will always make changes where we can to improve our service. This will only take three minutes to complete:

<http://www.smartsurvey.co.uk/s/NCCCcustomer/>

From: Alex Preston [<mailto:Alex.preston@tieruk.com>]

Sent: 23 November 2021 12:09

To: Enquiries, Unit <enquiries@environment-agency.gov.uk>

Cc: Sean Lee <sean.lee@tieruk.com>

Subject: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

To Whom It May Concern,

Please find attached a Supplementary Risk Assessment (SRA) Letter Report for review for the above site.
Please can this email be forwarded to the local waste team that covers the Knowsley area.

It is intended that this standalone letter SRA report will act as supporting evidence for a Materials Management Plan to demonstrate suitability of use of materials both on Site (in a 'Site of Origin' scenario).

It would be appreciated if you could review of the document and provide a formal response for inclusion in my MMP. Please note that we also intend for a review to be undertaken by the Local Authority (with regards to human health risk).

If you have any queries relating to the above, please do not hesitate to contact me.

Kind regards,



Alex Preston

Senior Geoenvironmental Engineer | Tier Environmental

Suite 414, Chadwick House, Warrington Road, Birchwood Park, WA3 6AE

t: [01925 818 388](tel:01925818388) | m: [07879 338 750](tel:07879338750) | e: Alex.preston@tieruk.com | w: www.tierconsult.com



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From: [Alex Preston](#)
To: [GMMCWasteEnquiries](#) [GMMCWasteEnquiries](#)
Subject: RE: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley
Date: 14 December 2021 21:29:00
Attachments: [TE1163EWS1.0.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Stephen,

Can you confirm the EA has reviewed the attached report? This should have closed out the below issues and allowed the planning conditions to have been discharged.

Regards,

From: GMMCWasteEnquiries GMMCWasteEnquiries <GMMCWasteEnquiries@environment-agency.gov.uk>
Sent: 13 December 2021 15:48
To: Alex Preston <Alex.preston@tieruk.com>
Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good Afternoon Alex

We have the following comment to make:

We have not yet discharged all conditions through the planning process and since this is a particularly complex site with a history of issues caused by soil heals causing issues to the nearby watercourse we cannot support this application until all these issues are resolved through the formal planning process.

Kind regards

Stephen Bostock
The Waste Enquiries Helpdesk Team
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

GMMCWasteEnquiries@environment-agency.gov.uk
Environment incident hotline (24/7) | 0800 80 70 60
General Enquiries | 03708 506 506

From: Enquiries, Unit
Sent: 24 November 2021 13:00
To: 'Alex.preston@tieruk.com' <Alex.preston@tieruk.com>
Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good afternoon

I have forwarded your email with attachment to the local EPR waste team.

Kind regards

Eileen Roffe
Customer Adviser
National Customer Contact Centre
Operations: Regulation, Monitoring and Customer
Environment Agency
Tel: 03708 506 506
Web Site: www.gov.uk/environment-agency

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From: Alex Preston [<mailto:Alex.preston@tieruk.com>]

Sent: 23 November 2021 12:09

To: Enquiries, Unit <enquiries@environment-agency.gov.uk>

Cc: Sean Lee <sean.lee@tieruk.com>

Subject: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

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If you have any queries relating to the above, please do not hesitate to contact me.

Kind regards,

|



Alex Preston

Senior Geoenvironmental Engineer | Tier Environmental

Suite 414, Chadwick House, Warrington Road, Birchwood Park, WA3 6AE

t: [01925 818 388](tel:01925818388) | m: [07879 338 750](tel:07879338750) | e: Alex.preston@tieruk.com | w: tierconsult.com



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From: [Alex Preston](#)
To: [GMMCWasteEnquiries](#) [GMMCWasteEnquiries](#); [Sean Lee](#)
Subject: Re: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley
Date: 23 December 2021 17:11:23
Attachments: [image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)

Stephen,

We have responded to the below comments and undertaken further monitoring as requested by the EA. All of these works are detailed in our Ground Investigation Report (V1.3) and Enabling Works Strategy.

Can you confirm if the EA has received these reports? They should satisfy all requirements and allow the discharge of the remaining planning conditions.

Regards,

From: GMMCWasteEnquiries GMMCWasteEnquiries <GMMCWasteEnquiries@environment-agency.gov.uk>
Sent: Thursday, December 23, 2021 5:03 pm
To: Alex Preston
Subject: RE: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report Symmetry Park Merseyside, Knowsley

Good Afternoon Alex

I have not had a response regarding your subsequent email on 14 December, and our technical team also remarked the planning portal was playing up as well, but they have provided the following information regarding your query below.

The Colliery site has been subject to a Groundwater regulations authorisation for the infilling of the lagoon with colliery spoil.

We understand that the groundwater levels within the workings is rising, and projections expect the water to be near to surface level as early as 2016, and as late as 2047. We do not have any current monitoring of the water within the mine workings but the colliery site is expected to be in an area at risk of surface emissions of mine water as is shown on the drawing 3666/D/CMA attached from the south Lancashire Minewater rebound study by IMC Consulting Engineers dated October 2000.

We understand that a borehole/s drilled as part of a mine gas exploration effort in the early 2000's is on site may not have been fully decommissioned. We ask that the applicant identifies any boreholes to determine whether there is a potential risk to the aquifer from the boreholes. We understand that some were drilled at the northern part of the site, close to the motorway. There may be some benefit in monitoring these wells for groundwater levels within the mine workings. We ask that the developer contacts the agency at the earliest possible opportunity once the boreholes have been located to progress this matter.

The site investigation has identified elevated heavy metal concentrations of Nickel, Zinc, and some PAH's. These are reported to be from historical mining activities. Sulphate concentrations are high as expected from colliery spoil leachate, and are well above the Drinking water standard.

The contaminant suite should be expanded to include the full range of contaminant from colliery spoil, particularly Iron, which will give a better indication of the chemistry present within the groundwater on site. Groundwater appears to be shallow in some of the trial pits however it is not clear whether this is a series of perched water pockets or a consistent groundwater body. The extent of connectivity with Fox brook is not well understood.

We suggest that a further round of groundwater monitoring be undertaken to identify the full range of contaminants and also analysis of Fox Brook Upstream downstream and on site to determine whether contaminated colliery spoil from site is impacting the water course.

From: Alex Preston <Alex.preston@tieruk.com>

Sent: 13 December 2021 17:49

To: GMMCWasteEnquiries GMMCWasteEnquiries <GMMCWasteEnquiries@environment-agency.gov.uk>

Subject: Re: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report
Symmetry Park Merseyside, Knowsley

Stephen,

Could you confirm which planning condition Has not been discharged?

Thanks



Alex Preston

Senior Geoenvironmental Engineer | Tier Environmental

Suite 414, Chadwick House, Warrington Road, Birchwood Park, WA3 6AE

t: [01925 818 388](tel:01925818388) | m: [07879 338 750](tel:07879338750) | e: Alex.preston@tieruk.com | w: www.tierconsult.com



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From: GMMCWasteEnquiries GMMCWasteEnquiries <GMMCWasteEnquiries@environment-agency.gov.uk>

Sent: Monday, December 13, 2021 3:47:54 PM

To: Alex Preston <Alex.preston@tieruk.com>

Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report
Symmetry Park Merseyside, Knowsley

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Stephen Bostock

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GMMCWasteEnquiries@environment-agency.gov.uk

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General Enquiries | 03708 506 506

From: Enquiries, Unit

Sent: 24 November 2021 13:00

To: 'Alex.preston@tieruk.com' <Alex.preston@tieruk.com>

Subject: FW: 211124/ER03 20/00494/HYB - MMP Supplementary Risk Assessment Letter Report
Symmetry Park Merseyside, Knowsley

Good afternoon

I have forwarded your email with attachment to the local EPR waste team.

Kind regards

Eileen Roffe

Customer Adviser

National Customer Contact Centre

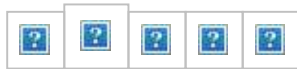
Operations: Regulation, Monitoring and Customer

Environment Agency

☎ Tel: 03708 506 506

🌐 Web Site: www.gov.uk/environment-agency

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t: [01925 818 388](tel:01925818388) | m: [07879 338 750](tel:07879338750) | e: Alex.preston@tieruk.com | w: tierconsult.com



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Summary

Status	Awaiting decision
Appeal Status	Unknown
Appeal Decision	Not Available

Important Dates

Application Validated Date	Tue 15 Mar 2022
Actual Committee Date	Not Available
Determination Deadline	Tue 14 Jun 2022
Temporary Permission Expiry Date	Not Available

Further Information

Application Type	Approval of Reserved Matters
Expected Decision Level	Delegated
Case Officer	Kevin Foster
Parish	Whiston Town Council
Ward	Whiston & Cronton
District Reference	Not Available
Applicant Name	Tritax Symmetry Merseyside 1 Limited
Agent Name	Mr D Page
Agent Company Name	Gerald Eve LLP
Agent Address	No.1 Marsden Street Manchester M2 1HW
Environmental Assessment Requested	No

Contacts

Ward Councillors

Ronald Gaffney

Address 103 Haslemere Whiston L35 3TW

Denise Allen

Address 3 Milton Close Whiston Prescott Knowsley L35 2YQ

Terry Byron

Address 41 Willis Lane Whiston Knowsley L35 3RU

Constraints

Name	Constraint Type	Status
EA Flood Zone 2	EA Flood Zones	Hazard
EA Flood Zone 3	EA Flood Zones	Hazard
EA Flood Zone 2	EA Flood Zones	Hazard
EA Flood Zone 3	EA Flood Zones	Hazard
EA Flood Zone 2	EA Flood Zones	Hazard
EA Flood Zone 3	EA Flood Zones	Hazard
EA River Buffer	EA River Buffer	Hazard
EA River Buffer	EA River Buffer	Historic Record
Sustainable Urban Extension	Sustainable Urban Extension	Local Plan
Strategic Road Network	Strategic Road Network	UDP
Archaeological Sites - SJ48NE 4789/10	Archaeological Sites	Hazard
Site Of Biological Or Local Geological Interest	Site of Biological or Geological Interes	UDP
Site Of Biological Or Local Geological Interest	Site of Biological or Geological Interes	UDP
The Old Wood - Halsnead Park	Ancient Woodland	Hazard
Overhead Power Line - M62 Junc 7 To Whitefield Lane	Overhead Power Line	Hazard
Coal - Low Risk - Standing Advice Area	Coal Consultation Zone	Hazard
Coal - Low Risk - Standing Advice Area	Coal Consultation Zone	Hazard
Coal - Low Risk - Standing Advice Area	Coal Consultation Zone	Historic Record
Coal - Surface Development Areas	Coal Consultation Zone	Hazard
Coal - High Risk Area	Coal Consultation Zone	Hazard
Coal - High Risk Area	Coal Consultation Zone	Historic Record
Coal - High Risk Area	Coal Consultation Zone	Historic Record
Airfield Safeguarding Zone - 90M	Airfield Safeguarding Zone	Hazard
Airfield Safeguarding Zone - Birds & Aviation	Airfield Safeguarding Zone	Hazard

TPO - Areas, Groups, Woods: 07/00004/TPO	TPO - Areas, Groups, Woods	Not Available
TPO - Areas, Groups, Woods: 86/00002/TPO	TPO - Areas, Groups, Woods	Not Available
TPO - Areas, Groups, Woods: 86/00002/TPO	TPO - Areas, Groups, Woods	Not Available
TPO - Areas, Groups, Woods: 64/00001/TPO	TPO - Areas, Groups, Woods	Not Available
TPO - Areas, Groups, Woods: 86/00002/TPO	TPO - Areas, Groups, Woods	Not Available
TPO - Areas, Groups, Woods: 86/00002/TPO	TPO - Areas, Groups, Woods	Not Available
TPO - Areas, Groups, Woods: 86/00002/TPO	TPO - Areas, Groups, Woods	Not Available

Related Information

There is 1 case associated with this application.

There is 1 property associated with this application.

APPENDIX C – TRACKING PRO FORMA

MATERIALS TRACKING FORM

SITE OF ORIGIN/DIRECT TRANSFER SITE/STF/HUB: _____ **DATE:** _____

LOCATION OF EXCAVATION: _____

GRID REF: _____ **OTHER:** _____

Excavated Material Classification Type:	

PLACEMENT LOCATION: _____

GRID REF: _____ **OTHER:** _____

Survey Undertaken:	Details:	
Photographs Taken:	YES / NO Ref Nos:	Number:
Samples Taken:	YES / NO	Number:
Chemical Testing Scheduled:	YES / NO Details:	
Geotechnical Testing Scheduled:	YES / NO Details:	
Comments:		

APPENDIX D – SUPPLEMENTARY RISK ASSESSMENT



Tier Environmental Ltd

Chadwick House, Warrington Road,
Birchwood, Warrington WA3 6AE
01925 818388

TE1163SRAL01.1

FAO Mr Ian Gaskill

Knowsley Town Council
Cumber La Whiston,
Prescot,
L35 2XG

29rd July 2022

SYMMETRY PARK, HUYTON, MERSEYSIDE -SUPPLEMENTARY RISK ASSESSMENT LETTER REPORT

PLANNING REFERENCE: 20/00494/HYB, 20/04360/PLANNI

Dear Ian,

Tier Environmental was commissioned by Tritax Symmetry to undertake a review of human health and controlled waters risk assessment of materials that are proposed to be re-used on site at land at Symmetry Park, Huyton, Merseyside.

It has been assumed in the production of this report that in the northern and central portions of the Site, the redevelopment is to comprise 4 No. industrial warehouses, each with associated car parking areas, surface water attenuation ponds and areas of soft landscaping. In the south and eastern areas of the Site it is proposed that the site will be redeveloped into a country park, comprising woodland, ephemeral lakes and footpaths. A large scale earthworks exercise (approximately 450,000m³ of cut/fill) is proposed to provide the appropriate development platforms and highway gradients.

The proposed layout of the Site is presented in UMC Architects Drawing No. 18128-F0006 Rev F, which is appended to this report. At the time of writing the four proposed units are as follows:

- Unit 01 –located in the eastern part of the site – 164,400ft² - approximate proposed final floor level – 41.20m AOD;
- Unit 02 – located in the northern part of the Site – 204,600ft² - approximate proposed final floor level – 37.50m AOD;
- Unit 03 – located in the north-western part of the Site – 238,565ft² – approximate proposed final floor level – 33.00m AOD and,;
- Unit 04 – located in the south-western part of the Site – 290,500ft² - approximate proposed final floor level –36.50m AOD.

This report is designed to provide information to aid the proposed hybrid planning application consisting of:

- Full application for the development of 164,400 sq. ft (15,273 sq. m) (GIA) of storage and distribution floorspace (Use Class B8), including ancillary offices (Use Class B1) and security



- gatehouse; site access road; engineering earthworks to form part country park; public car park to serve country park; footbridge over proposed site access road; and associated works; and,
- Outline application with details of point of access (details of part-access, landscaping, appearance, scale and layout are reserved) for the development of up to 835,600 sq. ft (77,629 sq. m) (GIA) of storage and distribution floorspace (Use Class B8), with ancillary offices and light industrial (Use Class B1); engineering earthworks to form country park and drainage attenuation ponds; pedestrian/cycle/equestrian route connecting existing M62 footbridge with proposed country park; and associated works.

The ground investigation report (reference TE1163GIR1.0) has been produced by Tier Environmental.

This document has been undertaken in order to assist in establishing the chemical and geotechnical suitability for potential **re-use** of Made Ground and reworked natural soils that will be generated during construction and preparation of a development platform.

Opportunities for the re-use of the materials in line with the CL:AIRE Definition of Waste CoP have been identified as part of the development scheme as, under current proposals, significant quantities of materials would need to be excavated and removed from Site and/or imported to Site in order to achieve the required finished levels.

Please find below a summary of the materials testing works, undertaken and the associated human health and controlled waters risk assessment along with justification to support the potential re-use of these materials on Site.

Summary of Previous Investigations

Made Ground was encountered at all exploratory hole locations from depths between ground level to depths greater than 14.50m bgl. Total Made Ground thickness was highly variable, but it was observed to be thinner in the north of the site. Made Ground generally consisted of colliery spoil amalgamated with some anthropogenic constituents which included brick, rubber, glass, concrete, slag and coal in the south of the Site.

In the northern sections of the Site Made Ground was generally composed of reworked topsoil material consisting of sandy silty loam. Some areas within the north contained no Made Ground. Localised areas of demolition rubble were observed within the former footprints of infrastructure related to the colliery.

Within the colliery spoil heaps, in the east of the Site very soft grey clayey silt was encountered from between approximately 4.00m bgl and 14.20m bgl. This material is believed to have been excavated from the old colliery settlement ponds and lagoons around the Site and deposited here in 1995. SPT N values within this material ranged from 1 to 7.

Materials representative of Till Deposits were encountered across the Site. This stratum was encountered as dark brown and light brown slightly sandy gravelly clay or as a gravelly sand. SPT N values achieved within this unit ranged from 4 to 78, indicative of low to very high strength soils. The



base of the Till deposits was proven at 13.40m bgl at its deepest extent across the site or at elevations between 32.20m AOD and 37.95m AOD.

Bedrock across the majority of the site was observed to be strata from the Pennine Middle Coal Measures Formation with the Kinnerton Sandstone Formation encountered within the east of the site. A north-south trending normal fault is shown to separate the two units on BGS geological maps.

The weathered Pennine Middle Coal Measures was encountered as a sandy gravelly clay, whilst the weathered Kinnerton Sandstone Formation was encountered as a slightly gravelly silty sand. Both increased in strength or density with depth. The competent rockhead was encountered between 37.94m AOD and 20.82m AOD, the base of these strata was not encountered.

Groundwater observations indicate that there are perched groundwater bodies present locally across the site, within the colliery spoil and locally within the Till Deposits. The minimum groundwater level during monitoring to date is 0.26m bgl (21.80m AOD). Seasonal variations in the groundwater level should be anticipated.

Localised low level asbestos impacts have been reported that are considered to present a potentially unacceptable risk to human health receptors for a commercial/industrial and public open space / park land use.

The dust inhalation pathways associated with asbestos impacted soils may be realised in areas where Made Ground soils remain at the surface (i.e. soft landscaped areas). It is considered that these pathways will be broken in areas of proposed hardstanding and building footprints such that no remediation will be required in those areas.

Additional analysis and detailed qualitative risk assessments have undertaken to determine the suitability of the asbestos impacted soils being retained at surface/shallow depth. An asbestos risk assessment report has been conducted alongside this report and is included with this letter. In summary, for the proposed end uses it has determined that the asbestos concentrations encountered present a minimal/tolerable risk to future site users.

Measured concentrations of chromium, copper, nickel, zinc, anthracene, fluoranthene and benzo(g,h,i)perylene were reported in soil leachate samples in excess of EQS Freshwater Values by between the same and 1 No. order of magnitude. Given the presence of colliery spoil to the north and south of the site, the absence of a persistent shallow groundwater body, the significant potential for dilution within groundwater at depth, the low order of magnitude of the exceedances and the fact that leachable concentrations in excess of the respective WQS appear not to be widespread, it is considered that the measured leachate concentrations do not present a significant risk to controlled waters.

Marginal EQS exceedances of cadmium, copper, lead, nickel, zinc, benzo(a)pyrene and fluoranthene were reported in groundwater samples taken at the Site. These concentrations are considered representative of assumed background groundwater quality associated with the surrounding areas



historical industrial land uses. As such, the measured groundwater concentrations on Site are not considered to represent a risk to controlled waters.

In accordance with CIRIA C665, the assessment of these results obtained to date produced a maximum Gas Screening Value of 0.3276l/hr, derived using the maximum recorded carbon dioxide concentration of 15.6%v/v and the maximum steady flow rate of 2.1l/hr. Assessment of this gas screening value alone places the Site in a Characteristic Situation 2. A low risk scenario in accordance with CIRIA C665 for which ground gas protection measures will be required.

Introduction to the Proposed Materials Re-Use

The proposed re-use of shallow soils has been developed in accordance with The Definition of Waste: Development Code of Practice (CL:AIRE, 2011) (hereafter referred to as the CoP) and promotes the use of materials in accordance with the waste hierarchy:

- Waste being minimised;
- Waste that is produced is recovered and re-used;
- Less waste will be sent to landfill

It is the objective of these next few sections to identify distinct populations of shallow soil materials and demonstrate that these materials can be re-used as an engineering fill to achieve formation levels on Site in such a way that they do not present a risk to human health or controlled waters. In addition, the next few sections will demonstrate the principal that the materials do not constitute 'waste'.

Re-use of the materials would significantly reduce the carbon footprint/emissions of the project associated with plant/lorries/vehicles that would deliver off-site derived materials and thereby reduces natural resource consumption. In addition, the re-use of the materials would demonstrably avoid significant volumes of materials unnecessarily being disposed of to landfill which would also require a significant number of lorries/vehicles and increase the carbon footprint of the project and create an environmentally unsustainable project.

Definition of Waste

Under the CoP, the proposed re-use of the materials falls under a 'Site of Origin' scenario as the materials will be used 'as part of the development of that land.'

Principals for the Use of Materials as Non-Waste

In accordance with the CoP, materials are only considered to be waste if they are discarded, intended to be discarded or required to be discarded, by the holder. The CoP considers the following factors to be of relevance when deciding whether materials are a waste.



- Factor 1 – Protection of human health and the protection of the environment. If the use of the material will create an unacceptable risk of pollution of the environment or harm to human health, it is likely to be waste.
- Factor 2 – Suitability for use, without further treatment. The materials must be suitable geotechnically and environmentally for its intended purpose. If no treatment is required, then they are unlikely to be waste e.g. engineered backfill beneath cover layers, capping layers, buildings, and hardstanding or use as sub-soil in landscaped areas. Some materials, although they do not require treatment to make them suitable for use, may be regraded or compacted and this does not prevent the materials from being regarded as a non-waste.
- Factor 3 - Certainty of Use. The holder must demonstrate that the materials will actually be used as a certainty. Any surplus materials would remain a waste.
- Factor 4 – Quantity of Material. Materials should only be used in the quantities necessary for that use, and no more.

The production of a Materials Management Plan (MMP) ensures that the above matters are considered and a correct determination is made in relation to the nature of the materials. A Materials Management Plan pertaining to the Site will be produced separately by Tier Environmental and submitted to a Qualified Person for approval in accordance with the CoP.

Proposed Re-Use of Materials - Background Information

A series of cut and fill plans have been produced by Tier Consult dated (appended to this document) which illustrates the anticipated cut and fill activities and site strip which are required to provide a geotechnically suitable platform for the proposed development.

In summary, there are number of key elements which are pertinent to the re-use of materials and the associated MMP:

The total cut estimate for the development is 397,084m³

It is proposed that all excavated material will be re-used across the site and no material will be exported from the site. Therefore, the total fill estimate for the development is 397,084m³

It is also acknowledged at this stage that the precise volume of some of the materials is subject to some variation as the project advances.

In order to mitigate this, Tier Environmental will obtain regular updates as to the progress of the cut and fill operations and any significant variations from the proposed materials use given in the anticipated volumes provided above. In the event that any volumes change significantly (either less or greater volumes), then this will be reviewed in the context of this Supplementary Risk Assessment (to confirm whether the variation has led to unsuitability for re-use) and the Materials Management Plan will be updated accordingly.

Assuming chemical suitability for re-use may be demonstrated, it is the intention that removal of materials from site will be kept to a minimum and that any excess volumes (should they arise during



the progress of the project) be disposed off-site; however, in the event that materials are to be removed then material exported from the site to landfill shall be hauled by a registered waste carrier in accordance with Duty of Care Regulations, 1991 and the Hazardous Waste Regulations, 2005.

Human Health Risk Assessment

Of the 40 No. samples which were screened for asbestos, 8 No. were found to contain asbestos fibres. Each of the samples which reported a positive asbestos screen was scheduled for asbestos quantification by gravimetrically derived weight percentage of each sample. Most of the samples reported weight percentages of <0.001% by mass, with the exception of WS106 at 1.00m within the colliery spoil material which recorded a value of 0.005 mass % and TP11 at 1.00m within the demolition rubble material which recorded a value of 0.029 mass %.

Additional analysis and detailed qualitative risk assessments have been undertaken to determine the suitability of the asbestos impacted soils being retained at surface/shallow depth. An asbestos risk assessment report has been conducted alongside this report and is included enclosed with this letter. In summary, for the proposed end uses it has determined that the asbestos concentrations encountered present a minimal/tolerable risk to future site users.

The asbestos assessment commenced on site with inspection of the Made Ground by our site staff for the presence of bulk ACMs. During the fieldwork, no fragments of visible ACMs were identified.

Due Consideration of Suitability of Low Level Asbestos Impacted Soils for Re-Use

It is considered that there are two fundamental exposure scenarios / receptors for the Site associated with the localised low level asbestos identified:

- Inhalation of airborne fibres during earthworks/construction by construction workers and adjacent site users;
- Indoor and outdoor inhalation of airborne fibres by future site users.

It is recommended that any construction works or movement of the localised low level asbestos impacted materials are undertaken in accordance with the Control of Asbestos Regulations 2012 (CAR 2012).

With regards to the proposed re-use of low level localised asbestos impacted materials at the Site, reference has been made to Section 15.3 of CIRIA C733, 'Asbestos in soil and made ground: a guide to understanding and managing risk'. C733 states that 'where ACSs cannot remain *in situ* and will be excavated, it may be appropriate to re-use, treat or dispose of the arisings'.

Given the low level nature of the asbestos reported it is considered that it is best to reduce double or triple handling of the soils that may result from off-site disposal of the materials as this will reduce the risk of fibre release from the soils. The proposed placement of the low level asbestos impacted soils should be done in accordance with CAR 2012 in such a way that the risks to construction workers are



effectively managed. Placement of the materials will be undertaken under an MMP in order to demonstrate that the materials do not constitute a waste.

Controlled Waters Risk Assessment

The results of the controlled waters assessment included within the Ground Investigation Report (summarised above) is that the Site does not present a potentially significant risk to controlled waters such that there is no evidence that the materials may not be reasonably re-used across the site. The building, hardstanding and dedicated drainage system will further reduce infiltration and therefore provides further confidence in the conclusion of this assessment.

Suitability for Use Assessment

Chemical Suitability

Made Ground and natural materials are suitable for re-use, based on the human health risk assessment.

Any potential Asbestos Containing Material (ACMs) fragments identified at the surface are **not** suitable for re-use and should be handpicked and disposed off-site under the Duty of Care.

Geotechnical Suitability

It is considered that the oversize materials described in the site investigation logs could reasonably be treated through a screening and crushing process to create a geotechnically suitable product such as a 6F2. Due to the asbestos element within the Made Ground it would be paramount to apply stringent controls in accordance with Control of Asbestos Regulations 2012 in order to mitigate any potential risk to human health. General Made Ground is predominantly granular and is likely to be deemed suitable as a general fill material in accordance with Series 600.

Overall, if geotechnically unsuitable material is removed, it is considered that the materials could be suitable for re-use for engineering purposes.

Verification Plan

A number of site visits by a suitably trained geoenvironmental engineer will be undertaken, as well as liaison with the site staff to confirm that materials movements are as specified in the MMP. Estimations of volumes will be made during earthworks.

Post earthworks, a verification report will be produced that will include, but not limited to:

- A description of the works undertaken;
- Progress photographs;
- Waste Transfer Notes (if applicable); and,
- A statement that the works have been undertaken in accordance with the Materials Management Plan.



Conclusions

- This report has been produced in support of a Materials Management Plan in order to demonstrate suitability of use of materials proposed for re-use on Site;
- A number of material populations have been identified on Site;
- All Made Ground and natural materials are suitable for re-use across the site subject to the implementation of remedial measures as described in this report;
- Any Asbestos Containing Materials (ACM) fragments at the Site (if identified during the works) will not be deemed suitable for re-use and should be handpicked and disposed off-site under the Duty of Care;
- The presence of low level asbestos in soils does not preclude the re-use of the materials. Any re-use shall; however be conducted in strict accordance with the Control of Asbestos Regulations 2012 and subject to the implementation of remedial measures as described in this report;
- Leachate analysis has demonstrated that the materials on Site do not present a risk to controlled waters. Indeed the proposed development will reduce site wide infiltration rates and incorporate a drainage system thus providing further confidence in this conclusion;
- On the basis of the information received to date, the materials demonstrably satisfy the four factors that the Definition of Waste CoP has laid out such that, following re-use, the materials which are proposed to be reused are no longer a 'waste'.

I hope that the above provides you with sufficient information to demonstrate suitability for re-use; however, please do not hesitate to contact us with any further queries.

Yours sincerely,

For and on behalf of

TIER ENVIRONMENTAL LTD

Alex Preston MEng (Hons)

Geoenvironmental Consultant

Tier Environmental Ltd