GIP Ltd.
Ground Investigation & Piling Limited

Ava Guest
C/O Slater & Gordon
58 Moseley Street
Manchester
M2 3HZ

Date: 8th March 2023
Our Ref: SJ/31835C

Soil Contamination Discovery Strategy – Newfold Farm, Sytch Lane, Brown Edge, Stoke-On-Trent

1. Introduction – General Contamination

1.1 Intrusive investigations have been carried out at the above site ahead of the proposed residential development. The exploratory work to date has allowed a general understanding of the ground conditions and levels of contamination present within the soil. Reference should be made to report ref KCD/30235 produced in April 2021 for details of the geology encountered and geo-environmental conditions revealed. Reference can also be made to the accompanying Soils Remediation Strategy Document (ref. SJ/31853B).

1.2 The proposals have already been submitted for planning to Staffordshire Moorlands District Council (application ref. SMD/2022/0313) who have imposed a number of conditions. The purpose of this report is to satisfy Planning Condition 10d which relates to the requirement for a discovery strategy to be in place in the event of unexpected soils contamination being encountered during development.

1.3 Intrusive works to date have not recorded any olfactory/visual evidence of hydrocarbon/solvent type contamination within the near surface soils. However, three above ground fuel tanks were present at the time of the 2021 investigation located within the existing barn structures occupying the northern site area. It was not possible to sink any exploratory positions directly beneath these features and so the contaminative status of the underlying near surface soils could not be assessed.

1.4 It is therefore possible that contamination not identified during the previous phase of investigation could be present and a strategy of contaminant discovery should be adopted during development.

1.5 Beneath the areas of the tanks this could present in the form of hydrocarbon impacted soils with associated vapours and / or staining. Also, as a matter of 'good housekeeping' during construction, a watching brief for unrecorded contamination or unusual geology is recommended.

2. Construction Phase Watching Brief and Discovery Strategy

2.1 There is a possibility that previously unidentified contamination may be encountered within soils during excavation works. A watching brief for ground contamination will be maintained. If visually contaminated or odorous material is encountered during the works, the assistance of a suitably qualified and experienced person (a Geo-Environmental Engineer) will be sought. The watching brief will include special consideration to identify hydrocarbon impacted soils beneath the plan areas of the three above ground tanks.

2.2 The development of the site should encompass the philosophy of on-site observation, qualitative assessments, and then possibly additional quantitative determination. The onus will be on an appointed representative of the Main Contractor (MC) to observe all excavation work and to notify the appropriate people of the discovery of materials that appear to be obviously contaminated.

2.3 The process relies upon the diligent observation by the MC, of all ground related operations, where excavation below the current site levels is required.

3. Watching Brief

3.1 Site inspections will be conducted and recorded during the works. These should include, but not necessarily limited to:

- observing weather conditions at the site (e.g. heavy rainfall with tracking of mud and surface water runoff or windy, dry conditions leading to airborne dust);
- inspection of the site haul roads and site exit and roads in the surrounding area for mud;
- detailing any environmental control measures implemented (e.g. dust suppression, road cleaning and inspection of vehicles);
- checking for potential evidence of spills and leaks for example from any refuelling and storage and to confirm that the appropriate spill kits are being maintained on site;
- inspections of any soil stockpiles and dewatering works to confirm that any associated pollution control measures are effective;

- identifying evidence of any pollution at the site boundary (e.g. dust or odours);
- undertaking inspections for potential visual and/or olfactory indicators of contamination (and recording any actions taken), for example:
- oil staining, black liquids, tars and unusual colours;
- odours, such as hydrocarbons and solvents;
- buried tanks, drums or structures;
- bulk asbestos containing material; the absence of any obvious visual evidence of asbestos does not mean that the soil is free from asbestos contamination; and
- maintaining a record and confirmation of all waste disposal movements and ensuring that all associated documentation is correctly completed.

3.2 If previously unidentified areas of potential contamination such as hydrocarbon impacted soils (black or other coloured staining, odours, etc.), coloured soils, unusual odours (sweet, organic, solvents, acidic, sulphurous or acrid) or ACM (sheeting, lagging, fibrous, materials, gaskets, paper, rope, etc.) are encountered the following steps will be taken:

- an appointed specialist will be consulted;
- soil will either be sampled in-situ in the ground (and left undisturbed while the samples are tested, and the results interpreted) or be excavated and stockpiled separately in an appropriate manner (i.e. bunded and covered stockpile); and
- measures will be taken to restrict dust and surface water run-off. On receipt of the results, soils should be disposed off-site to a suitable licensed treatment facility or landfill.

4. Primary Contact Details

1. Contractors Site contact details are to be confirmed.
2. Geo Environmental Specialist to be confirmed. Suggest: Julian Hughes GIP Limited 01902 459558 julian@gipuk.com
3. Local Environmental Health to be contacted if required via GIP Limited.

FOR AND ON BEHALF OF **GIP LIMITED**



S. Jones BSc (Hons), FGS,
SENIOR GEO-ENVIRONMENTAL ENGINEER
Author Contact Details: scott.jones@gipuk.com Tel: 01902 459 558



J. P. Hughes BSc, MSc, C Geol, FGS, C SCi
MANAGING DIRECTOR