

Materials Planning Checklist (England & Wales)

All sites (in England & Wales) proposing to reuse excavated material, which is either site won, or to be imported from another development site, must complete the checklist below.

Contaminated and non-contaminated material may be used as a non-waste providing ALL the following criteria are met and documented:

* Use of the material will not increase the risk of harm to the environment or human health;
* The material is suitable for use;
* There is a certainty of use; and
* Materials should only be used in the quantity necessary for that use.

**Clean & naturally occurring material**

If site won, clean and naturally occurring material (see definition below), is to be used on-site, no Materials Management Plan (MMP) is required.

**All other scenarios (import, export, reuse of contaminated materials)**

We must comply with the CL: AIRE (Contaminated Land: Applications in the Real Environment) Definition of Waste Code of Practice (DoWCoP), with a suitable Materials Management Plan (MMP) and associated Qualified Person sign-off in place (see below).

|  |  |  |
| --- | --- | --- |
| **Section A** | | |
| **Check** | **Y** | **N** |
| Will (only) site won ‘clean & naturally occurring’ material be used on site? E.g. a review of information on the source site verifies that the material is geo-technically and environmentally suitable |  |  |
| If answer ‘yes’ above, no further work required other than to file this form along with relevant SI / Geotechnical report in PEP folder. | | |
| If answer ‘no’ above proceed to Section B below | | |
| **Section B** |  |  |
| Identify the correct reuse scenario below: | | |
| i - Reuse on the site of origin |  |  |
| ii - Direct Transfer of clean naturally occurring soil / mineral materials |  |  |
| iii Export off-site (for reuse on other development) \* |  |  |
| If answer yes, to i or ii above, engage a consultant to carry out the following: | | |
| * Review of information on the source site to verify that the material is geo-technically and environmentally suitable * Completion of a Design Statement or Remediation Strategy * Regulatory liaison * Completion of a Materials Management Plan * Declaration to CL:AIRE * Review of MMP by Qualified Person (QP) and submission of declaration * Completion (and submission) of Verification Report to CL:AIRE (upon completion) |  |  |

\* Export - if site is to export soils (materials) off-site to another development, then the receiving site is required to have an MMP in place. Our site (the donor) must be included as a ‘donor’ site in the receiving sites MMP. This requires review and approval by the Qualified Person prior to any movement of materials from site. A copy of the MMP must be provided prior to any movements.

|  |  |  |  |
| --- | --- | --- | --- |
| **Authorised by:** HS&E Director | **Version date:** 05.12.23 | **Version: 3** | **STD:** Soil Management  **Form No:** 012 - Materials Planning Checklist |
| **Uncontrolled if printed or copied – always check the Group HS&E policy folder for latest version** | | | |

**Site Investigation Process Map and Materials Planning**

**CL: AIRE DoWCoP**

**Engage Consultant**

Site will require a Materials Management Plan (**MMP**) with Qualified Persons sign-off.

A Verification Report must be submitted to CL: AIRE upon completion of works

**Phase I** – desktop study, looks at previous use of site

**Phase II** – will include intrusive sampling (boreholes, trial pits, soil samples), groundwater penetration tests, human health risk assessment

**Phase III** – remediation strategy – completed if ground poses a risk to people & the environment

**Phase IV** – Verification/Validation Report

**YES**

Soils can be reused on site without any regulatory controls.

Complete Materials Planning Checklist (Part A) to evidence appropriate checks

**Remediation Strategy / RMS**

Phase III

Draws up a list of options for managing soils (whether reusing on site in safe manner e.g. capping or removal off-site if not suitable)

**Not Suitable**

Off-site disposal required

**Suitable**

Re-use on-site **or** off-site

**NOTE:**

Soil reuse requirements are different in Scotland as outlined in Soil Management Standard, Section 5.

**Waste characterisation & classification**

 If soils are to be disposed of, then samples must be taken and submitted for chemical analysis to determine their properties & classification (**5-10 days**) *in addition, site attendance can take up to* ***2 weeks***

**Human Health/Environment**

Phase II

This assesses whether the material is hazardous to human health or the environment.

*Soil/ground is assessed against criteria relevant to the end of use of the site.*

Reusing soils (on-site or off-site)

Disposing of soils (to waste site)

**Risk Assessment**

Phase II

Is the material suitable for reuse on site?

*Risk assessment looks at risk to both workers on site and the end user*. *Also looks at risk to groundwater*

**NO**

Material poses a risk to the environment / groundwater/ human health

The material is not suitable for use (on site / off site) in current state. Options must be sought

**YES**

Material does not pose a risk to the environment/ groundwater/human health

The material is suitable for use keep on-site.

**Hazardous Waste**

Samples possess hazardous properties above threshold

(HP1-HP15) and POPS

**Non- Hazardous Waste**

Samples do not possess any hazardous properties

Is waste destined for landfill?

**YES**

Request **WAC** (waste acceptance criteria) test. *Laboratory test can take* ***1-2*** *weeks.*

WAC test will determine which type of landfill waste can be disposed of to (e.g. inert, non-hazardous, hazardous)

*Ensure samples are taken at appropriate* ***depths & relevant*** *to where soil arising’s will occur*

**NO**

Soils are going to soil treatment site, restoration site etc. No **WAC** testing is required for these type of destination sites. ***WAC test will still be required for pricing purposes.***

*Often done in tandem with the waste classification test to save on cost & tim~~e~~.* ***See comment to left*** *re: depth & sample locations.*

WAC testing is a legal requirement for waste going to landfill

***Is the material clean & naturally occurring?***

Prioritise reuse where possible

**Materials Planning Checklist**

File in Project Environmental Plan as evidence of suitable assessment

**NO**

Evidence of made ground e.g. bricks, wood, asphalt, ash, clinker.

 Complete Materials Planning Checklist

**Technical Team Role**

1 - Assess whether an opportunity / requirement to reuse soils on-site or at another development

2 - Carry out review of SI Report(s) to assess soil suitability for reuse

3 – Follow process and compile relevant documentation accordingly

**Site Investigation Report Received**

Phase I > Phase II > Phase III

*Note: only Phases I & II are required for planning purposes. If not done, PH should commission SI.*

|  |  |  |  |
| --- | --- | --- | --- |
| **Definitions & Acronyms** | | | |
| **What** | **Who** | **Description** | **Time** |
| CL:AIRE DoWCoP (Definition of Waste: Code of Practice) | N/A | **Contaminated Land: Applications in Real Environments** (CL:AIRE) Definition of Waste Code of Practice (DoWCoP) produced by industry, in agreement with the Environment Agency. The DoWCoP provides a clear, consistent and efficient process which enables the reuse of excavated materials on-site or their movement between sites. Use of the DoWCoP supports the sustainable and cost-effective development of land. It can provide an alternative to Environmental Permits or Waste Exemptions. | N/A |
| Site won | N/A | Site won material is that which arises from within the red-line boundary for the development (on planning application). | N/A |
| Clean & naturally occurring | N/A | This includes:  • Soil, both top soil and sub-soil  • Clays, silts, sands and gravels  • Underlying geology  • Reworked material consisting of the above materials only | N/A |
| Contaminated material | N/A | Contains substances that could cause significant harm and or pollution of controlled waters. Harm is damage to human health the environment and or property. | N/A |
| Made ground | N/A | Made Ground is essentially soil that has been subjected to anthropogenic intervention. It may be fill material (structural or landfill), reworked soils (as commonly found on arable land), or a combination of a variety of materials from past demolition, reworking and importing. | N/A |
| Reuse on site of origin | N/A | This scenario applies when excavated material is to be used on the site from which it has been excavated, either without treatment or after on-site treatment. Only site won material (from within red-line planning boundary) can be reused in this scenario. | N/A |
| Direct Transfer of clean naturally occurring soil / mineral materials | N/A | This scenario applies when development sites have a requirement to import soils from other development sites. This scenario covers both clean naturally occurring material and contaminated material. | N/A |
| Remediation Method Statement (RMS) ***aka*** Remediation Strategy | External employed by PH | Required where contamination **is** present or suspected. The site investigation report will include recommendations for remedial actions. These recommendations will be reviewed by the regulators, which will typically include the Environment Agency / NRW and the local planning authority.  When the requirements for remedial works have been agreed, it is routine to formalise the process in a remediation method statement (RMS). This document details the measures required to make the site suitable for its proposed end use, including any monitoring and validation works. | 4-6 weeks |
| Design Statement | External employed by PH | Required where reusing SITE WON or IMPORTED made ground/soils & contamination is **not** suspected. Will include an appropriate assessment to verify that made ground/soils are suitable. Detail required in this document is likely to be significantly less than an RMS. Produced by an external consultant. | 2-4 weeks |
| Materials Management Plan (MMP) | External employed by PH | Produced by an external consultant to allow for soils/made ground to be re-used, either on-site or off-site. Must then be forwarded onto an externally appointed QP (see below).  **Note** – there is a **30 day** consultation period with Regulators on MMPs. | 2-4 weeks + 30 days |
| Qualified Person (QP) | External employed by PH | Prior to works:  A Qualified Person must review the evidence relating to the proposed use of materials on a specific site and if satisfied, will sign a Declaration and submit it to the EA/NRW. A copy must be immediately supplied to the person commissioning the excavation.  Upon completion of works:  In order to prove that materials have been treated and used in an acceptable manner, a Verification Report must be prepared at the conclusion of works and forwarded onto CL:AIRE (and EA/NRW if requested).  **Note –** a QP must be recorded as a Qualified Person with CL:AIRE. They must also be appointed **independently** by PH (i.e. cannot be appointed by the consultant responsible for compiling the MMP). | 2-4 weeks  **+**  2-4 weeks |
| Verification / Validation Report | External employed by PH | A report containing evidence to demonstrate that remediation objectives have been achieved. Required when operating under an RMS or Design Statement.  Undertaken by a consultant; but typically, requires input from PH and supply chain partners whom completed works on site. Consultant will compile evidence and produce report for submission to the Qualified Person. They will review evidence and forward onto CL:AIRE (and Regulators where necessary, e.g. to Local Authority to discharge planning conditions). | 4-6 weeks |
| Waste Classification | External employed by PH | Wastes must be sampled and analysed to identify if they are hazardous or not. This includes soils, asphalt suspected of containing coal tar, materials containing asbestos etc. Chemical testing is conducted to determine a waste code, this must be done before any waste soils are removed. **Note** – lead time can be 2-4 weeks. | 1-2 weeks |
| Waste Acceptance Criteria (WAC) test | External employed by PH | Required for wastes intended for disposal at landfill sites. Criteria are in place for inert waste landfill and hazardous waste landfills. A WAC test must **not** be used to classify waste. **Note** – lead time can be 2-4 weeks. | 1-2 weeks |
| Persistent Organic Pollutants (POPS) | External employed by PH | Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment. POPS can include: pesticides; industrial chemicals; or unintentional by-products formed during industrial processes. The site investigation desk study should identify if testing for POPS is recommended. **Note** – lead time can be 2-4 weeks. | 1-2 weeks |