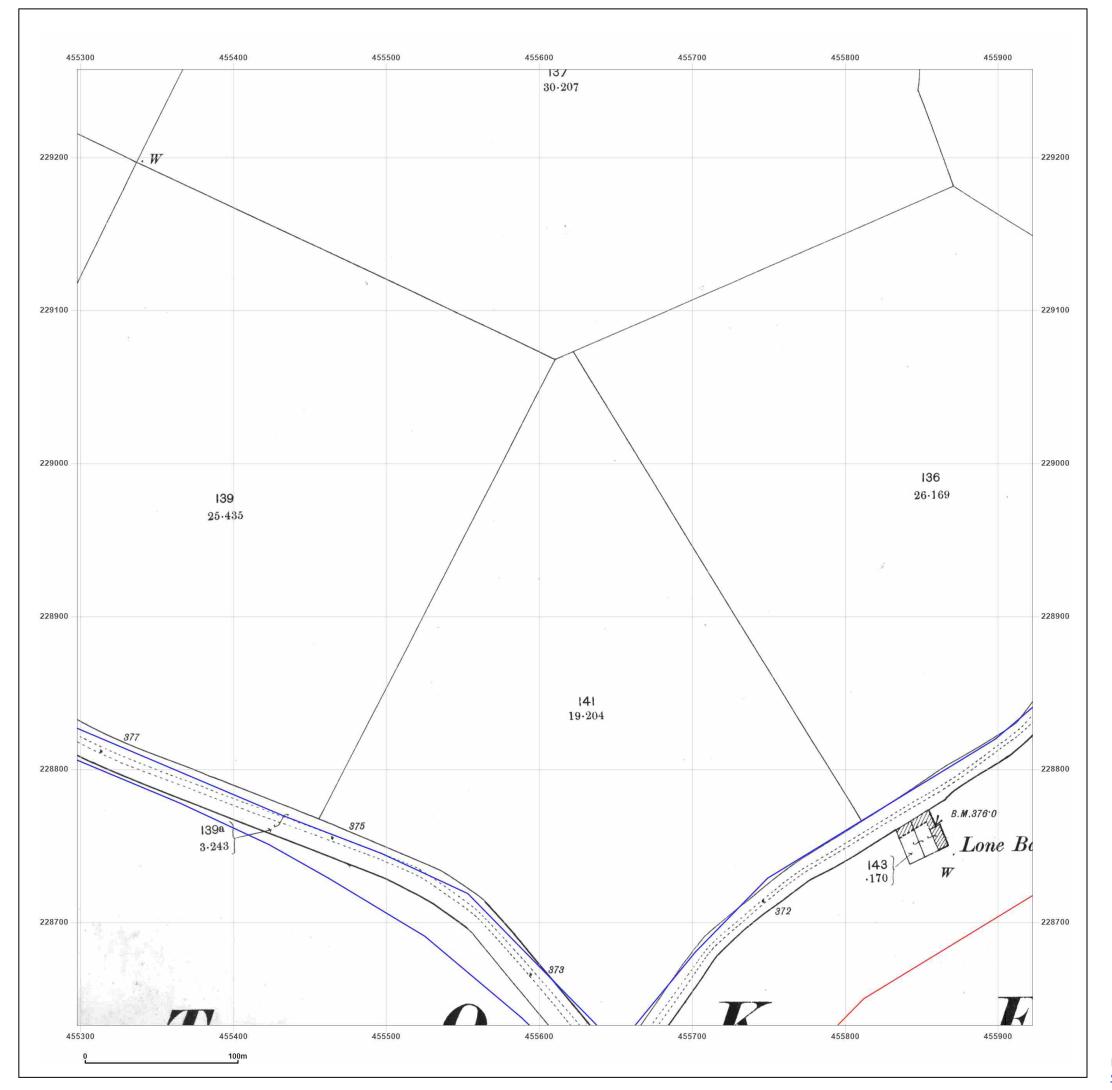




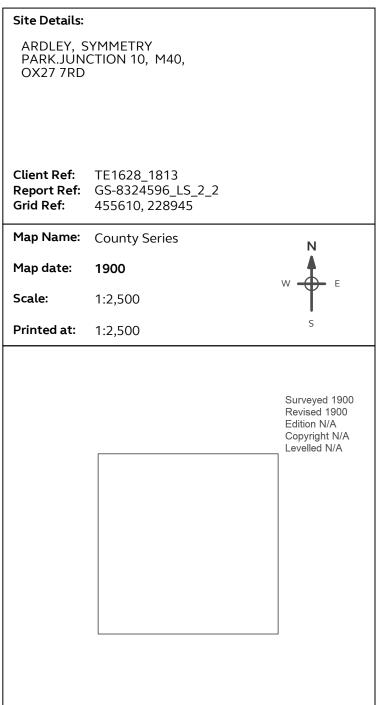
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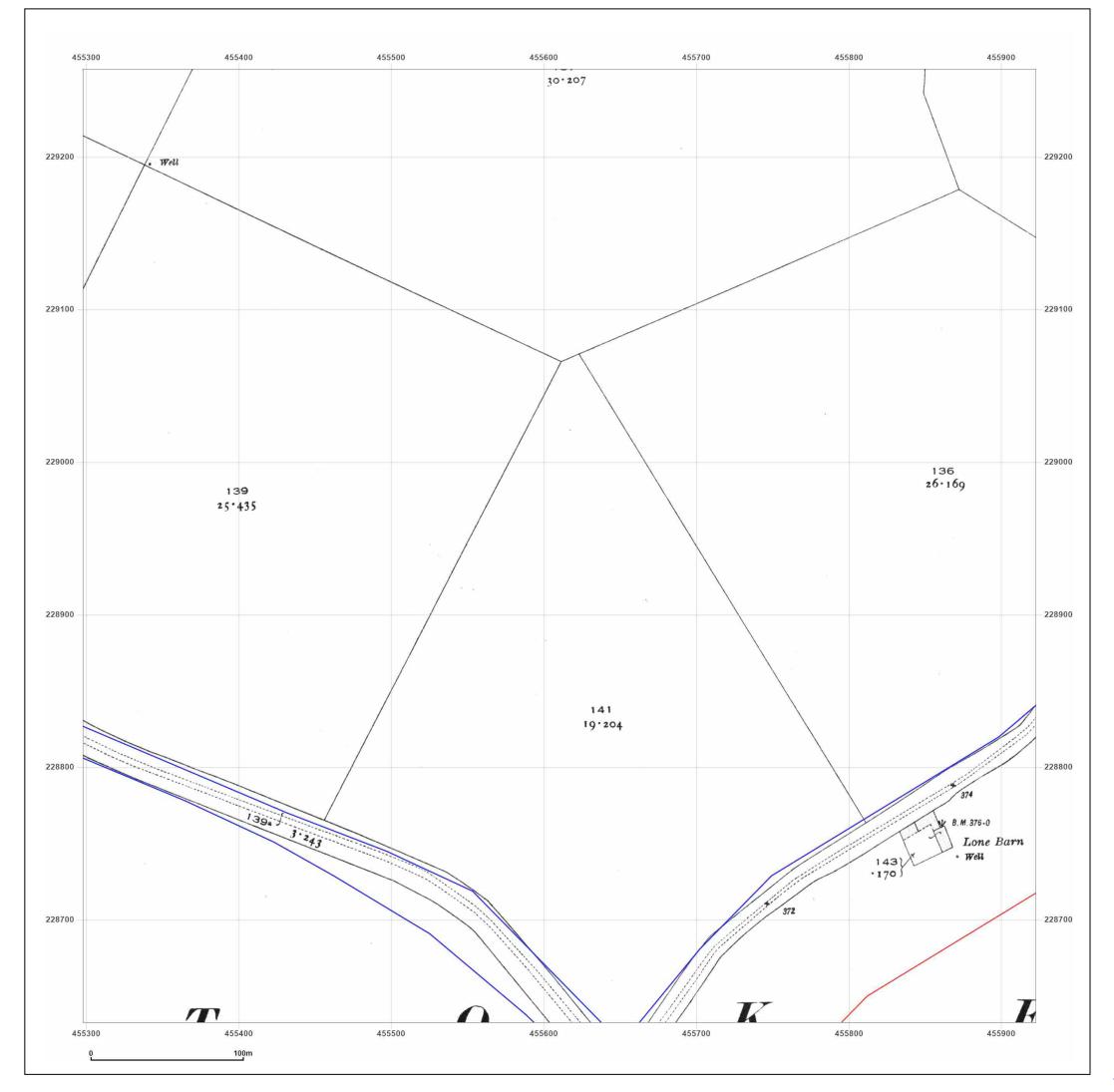




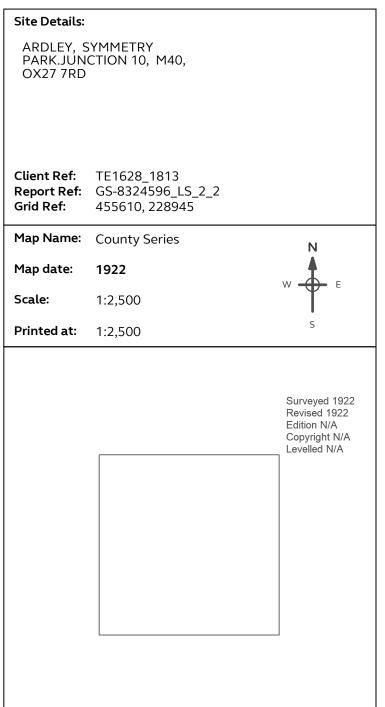
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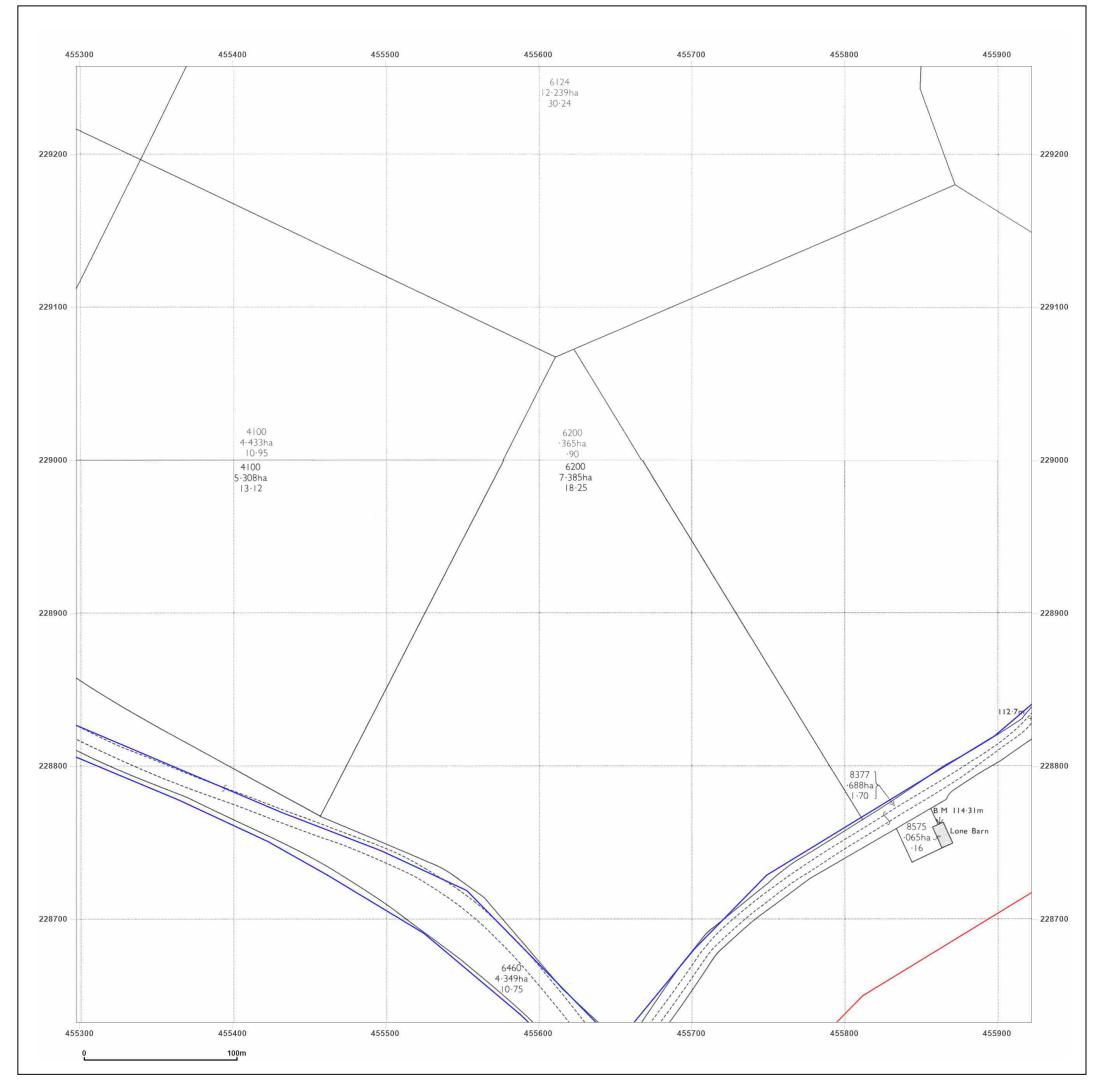




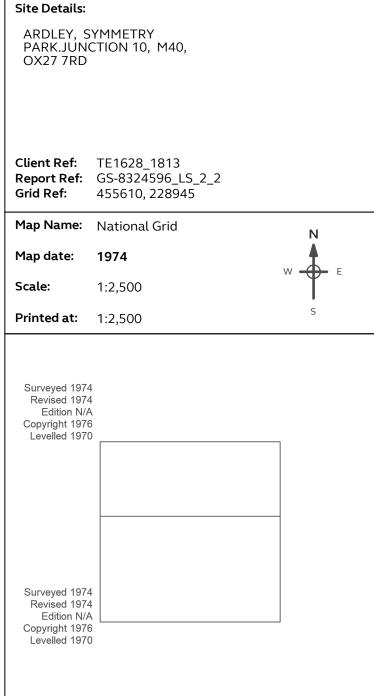
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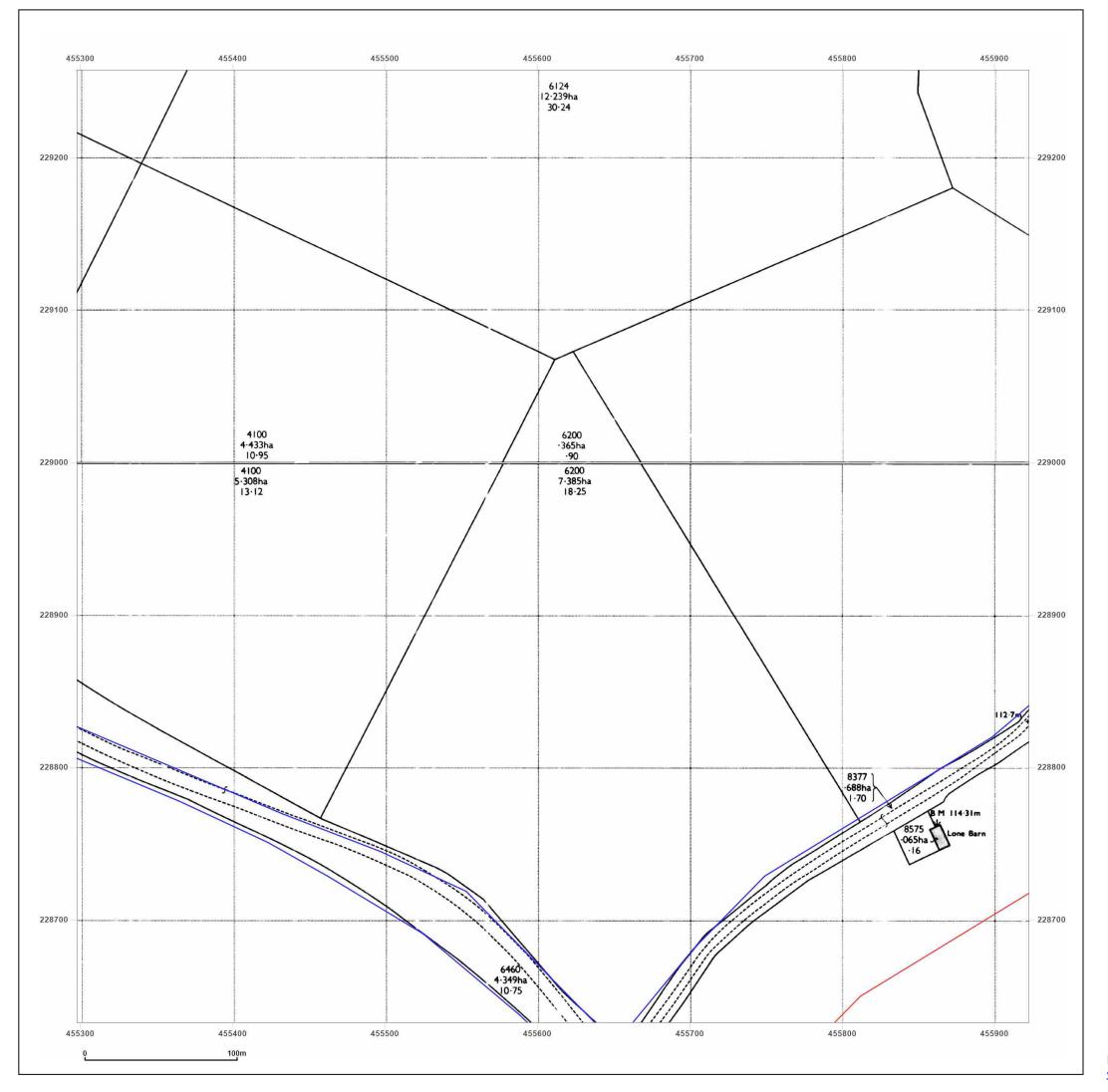




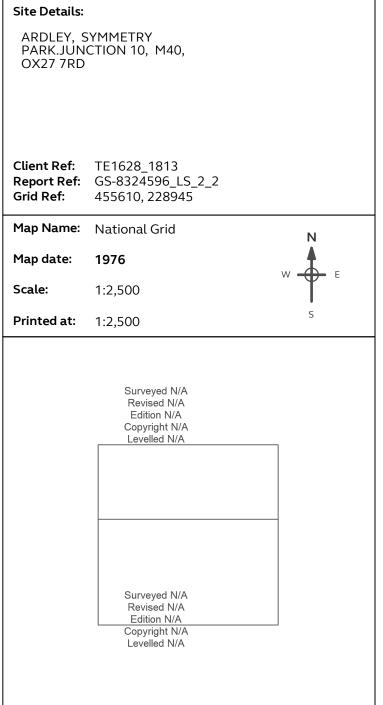
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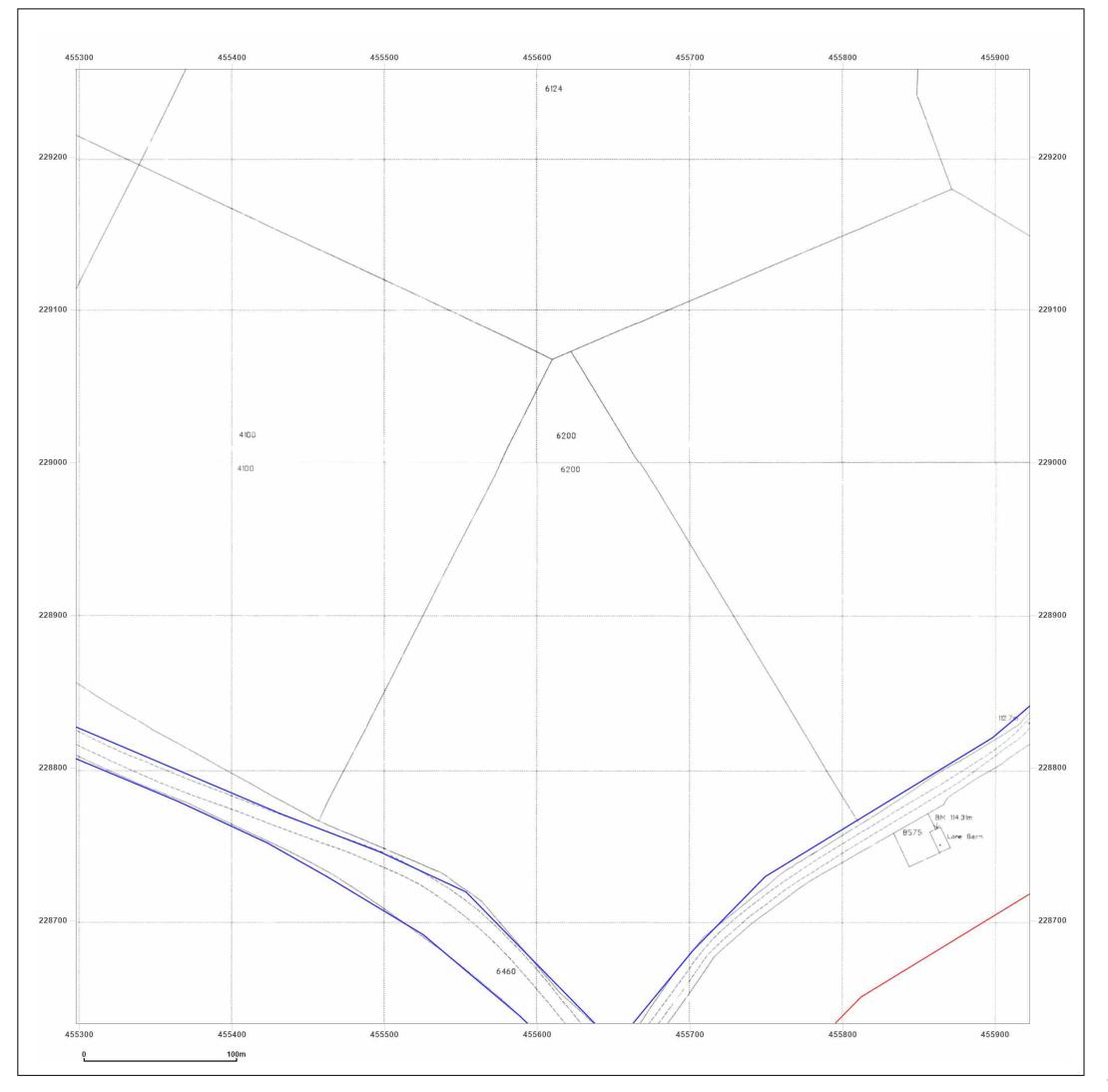




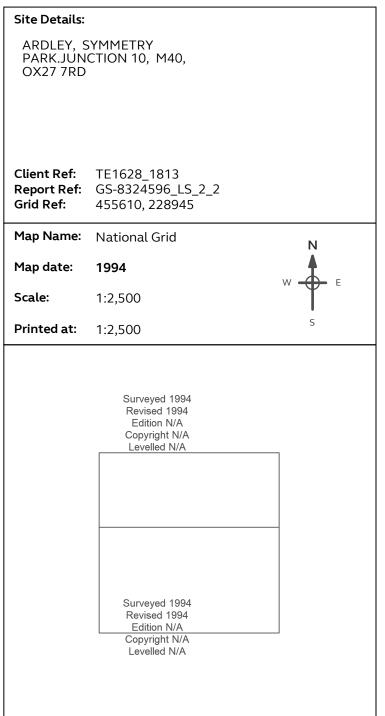
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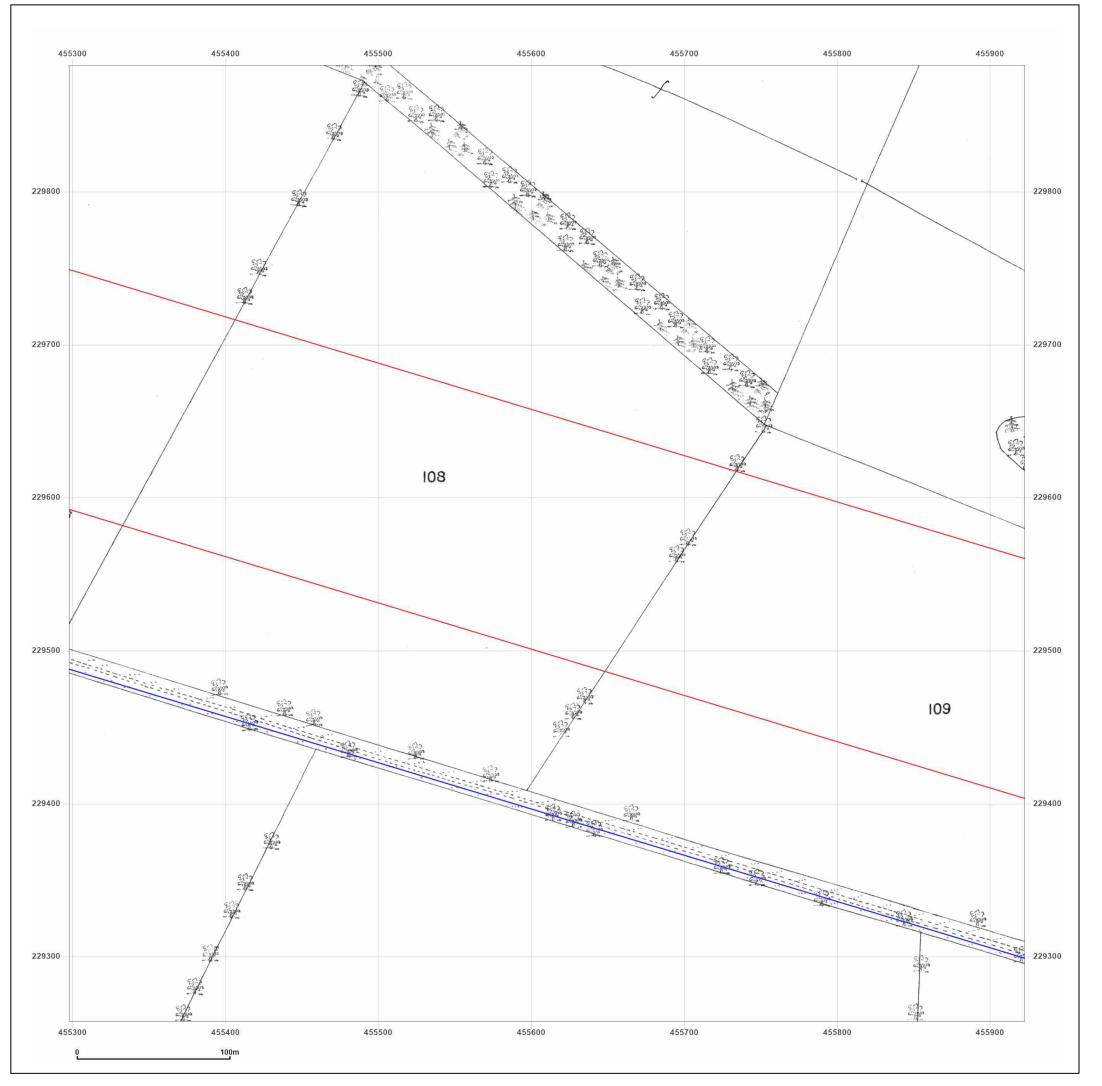




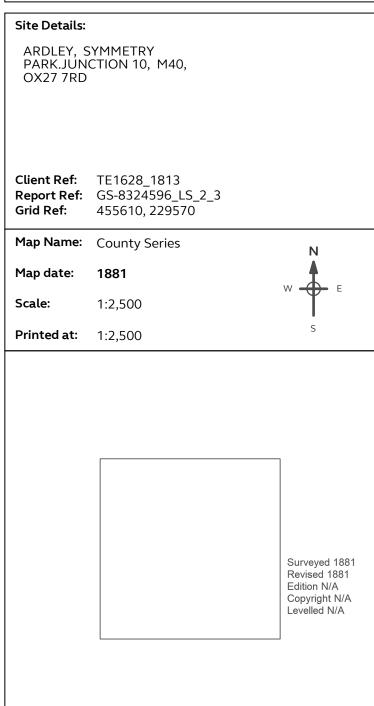
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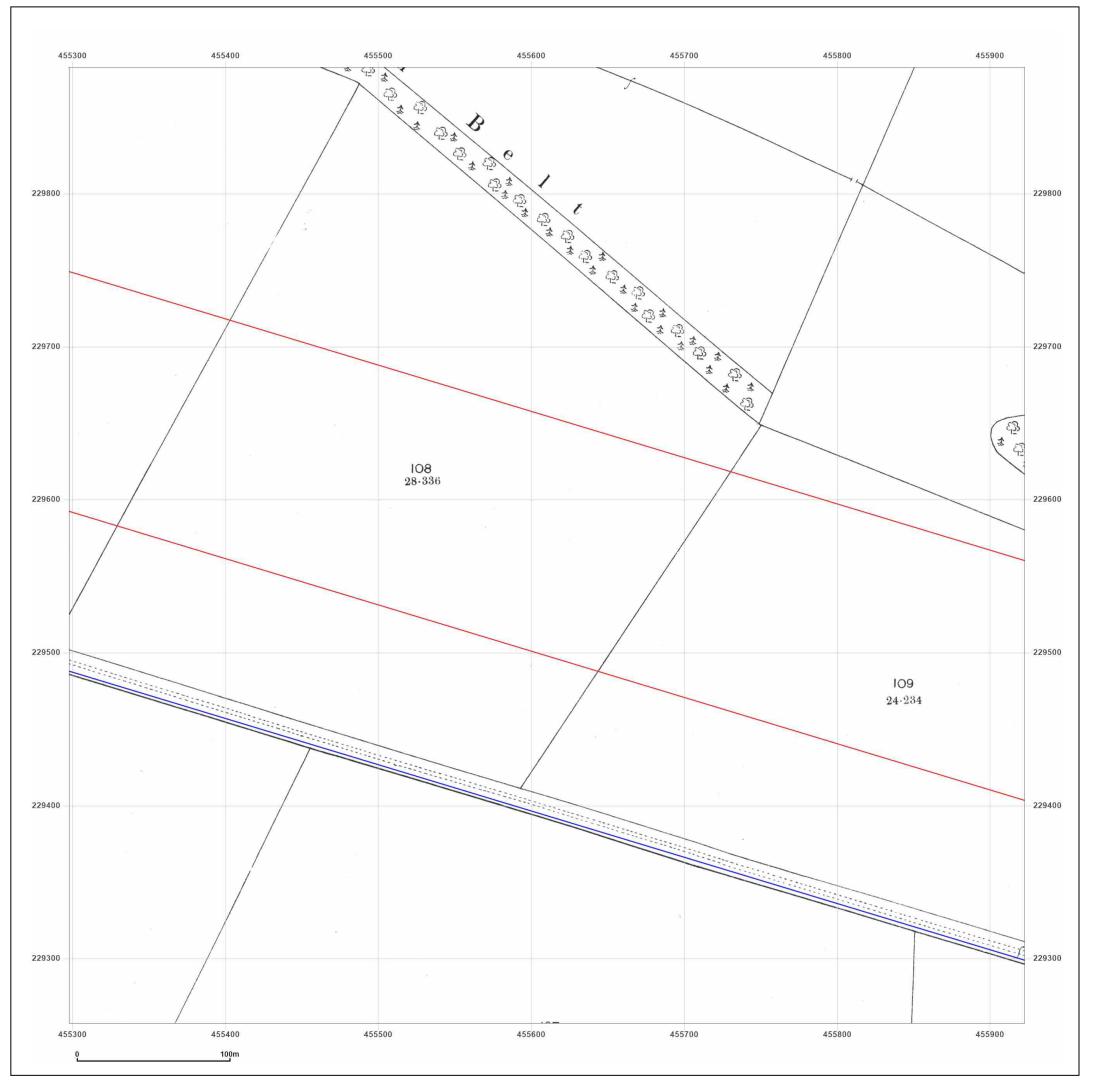




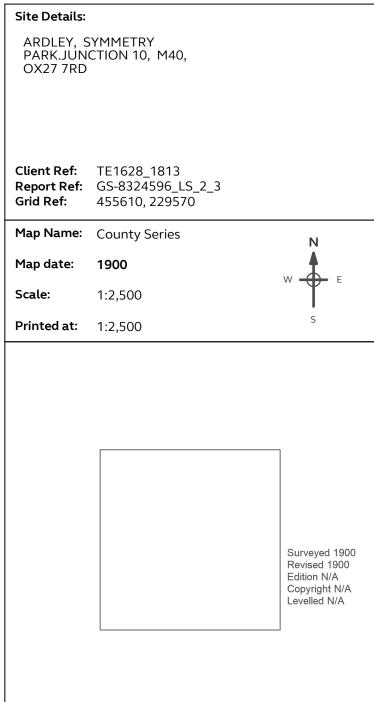
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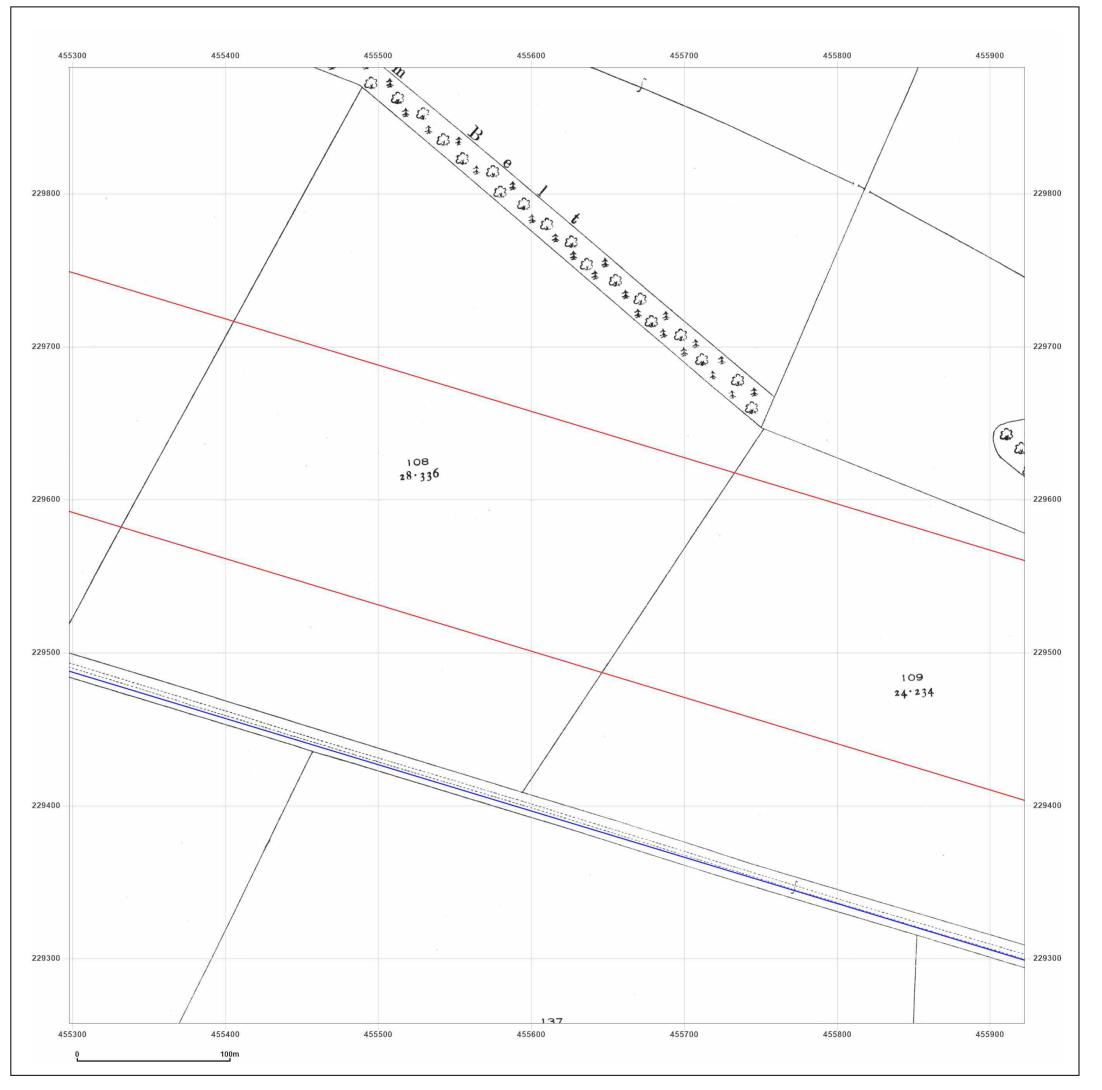




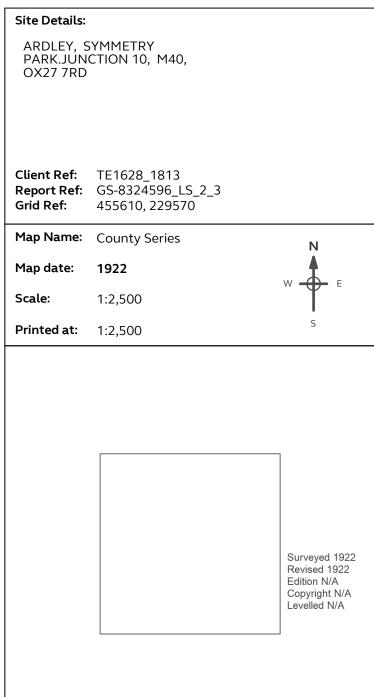
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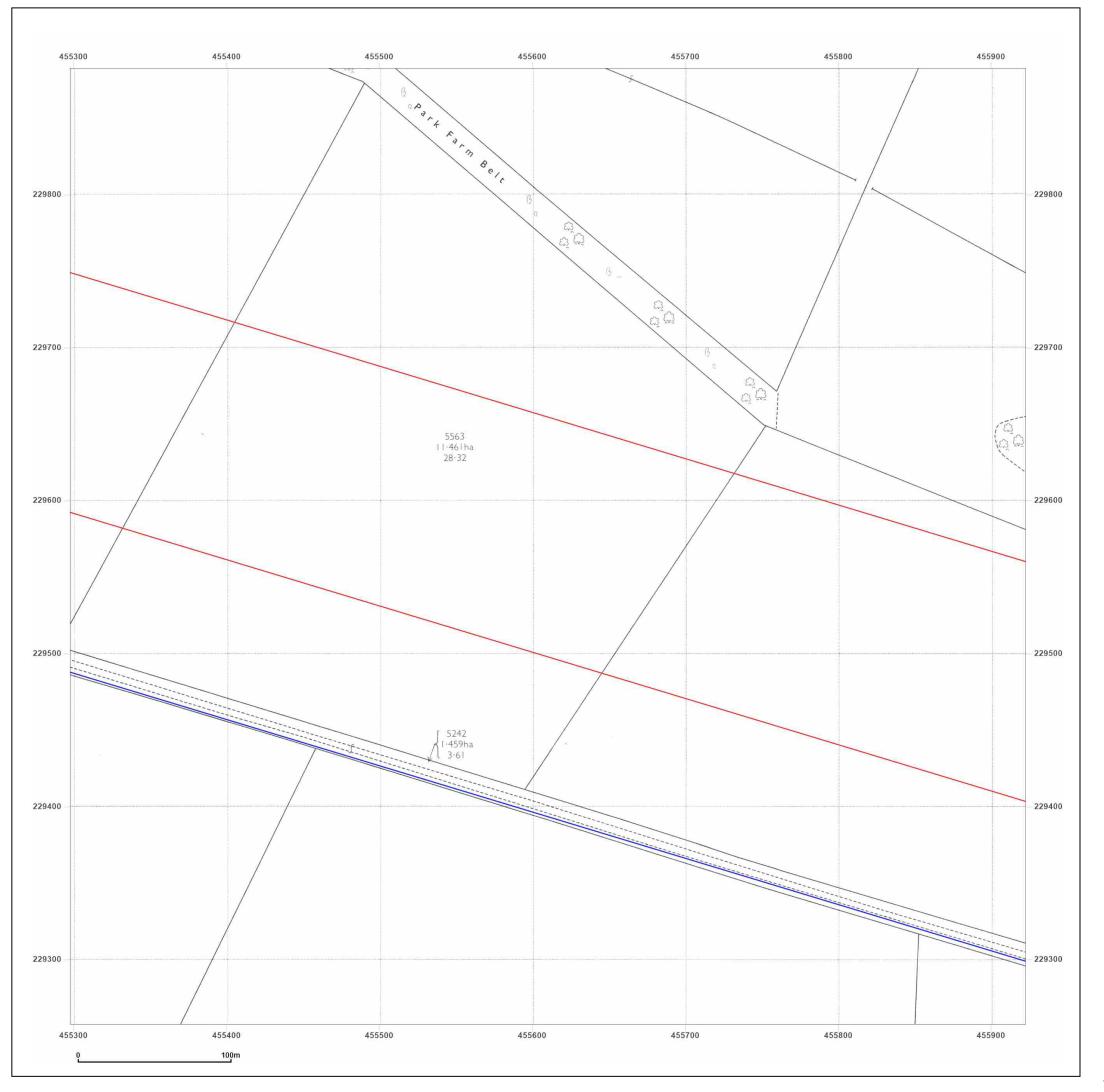




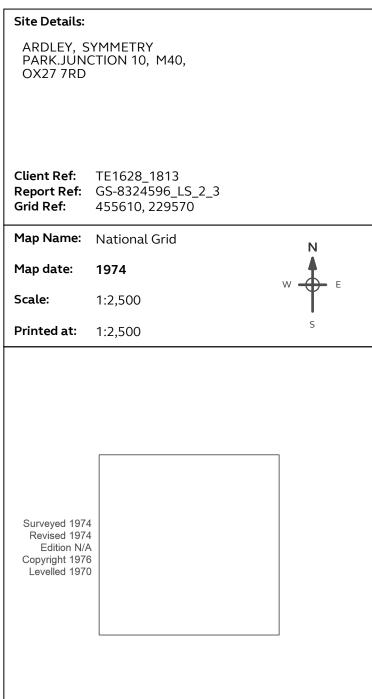
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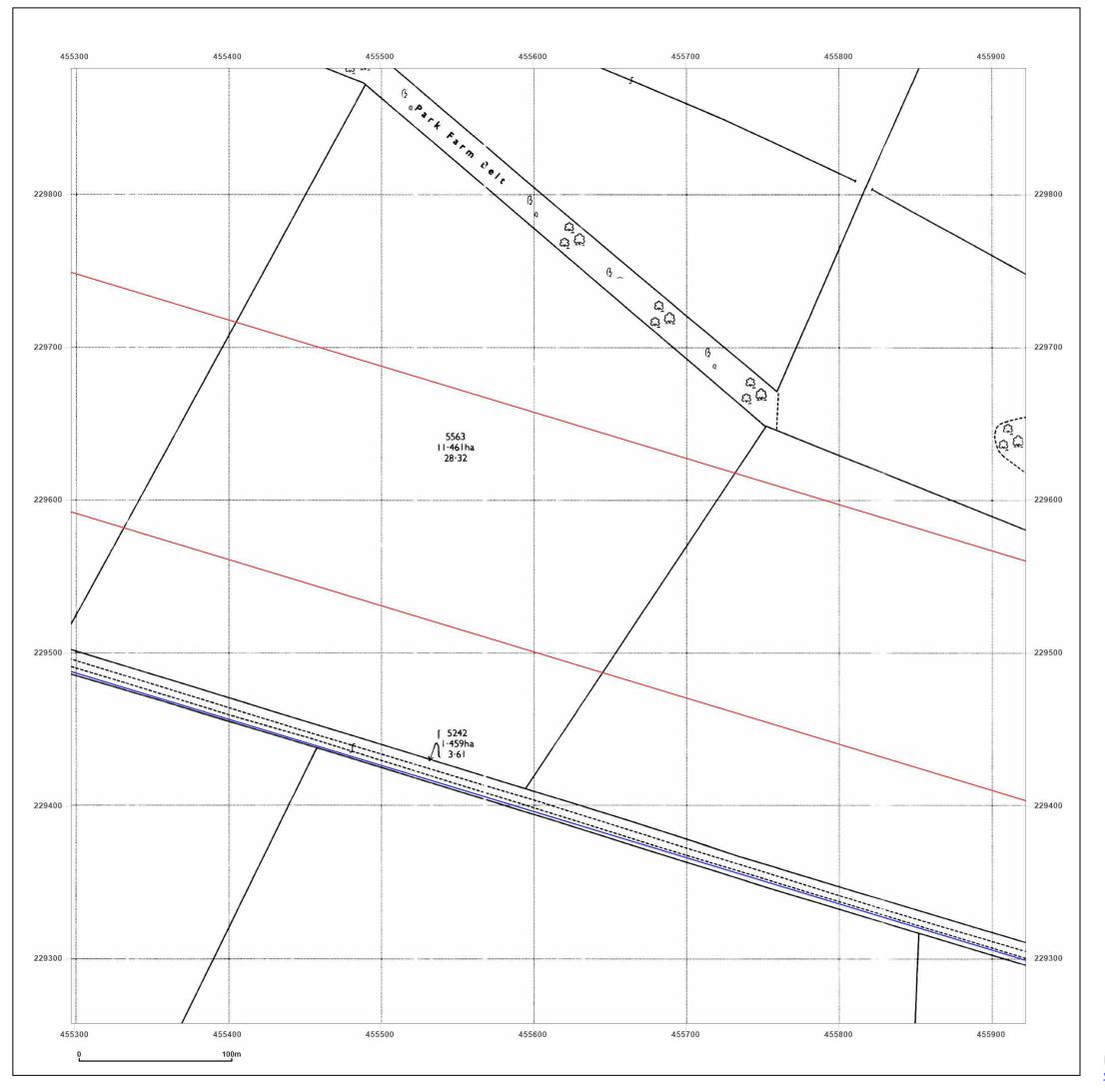




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# Site Details:

ARDLEY, SYMMETRY PARK.JUNCTION 10, M40, OX27 7RD

 Client Ref:
 TE1628\_1813

 Report Ref:
 GS-8324596\_LS\_2\_3

 Grid Ref:
 455610, 229570

Map Name: National Grid

Map date: 1976

**Scale:** 1:2,500

**Printed at:** 1:2,500

Surveyed N/A Revised N/A Edition N/A Copyright N/A Levelled N/A

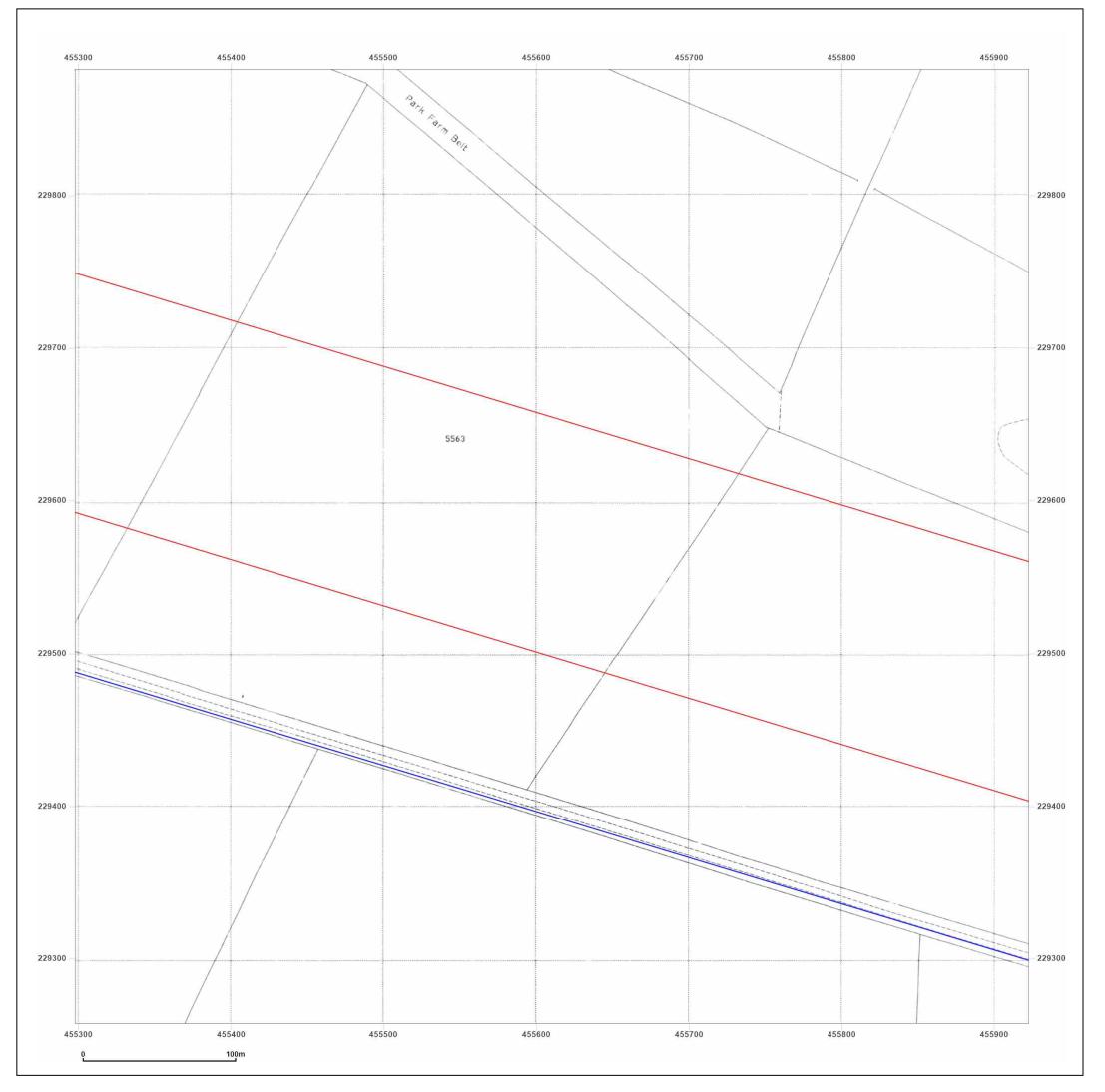


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Production date: 10 November 2021

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# Site Details:

ARDLEY, SYMMETRY PARK.JUNCTION 10, M40, OX27 7RD

 Client Ref:
 TE1628\_1813

 Report Ref:
 GS-8324596\_LS\_2\_3

 Grid Ref:
 455610, 229570

Map Name: National Grid

Map date: 1994

**Scale:** 1:2,500

**Printed at:** 1:2,500

Surveyed 1994 Revised 1994 Edition N/A Copyright N/A Levelled N/A

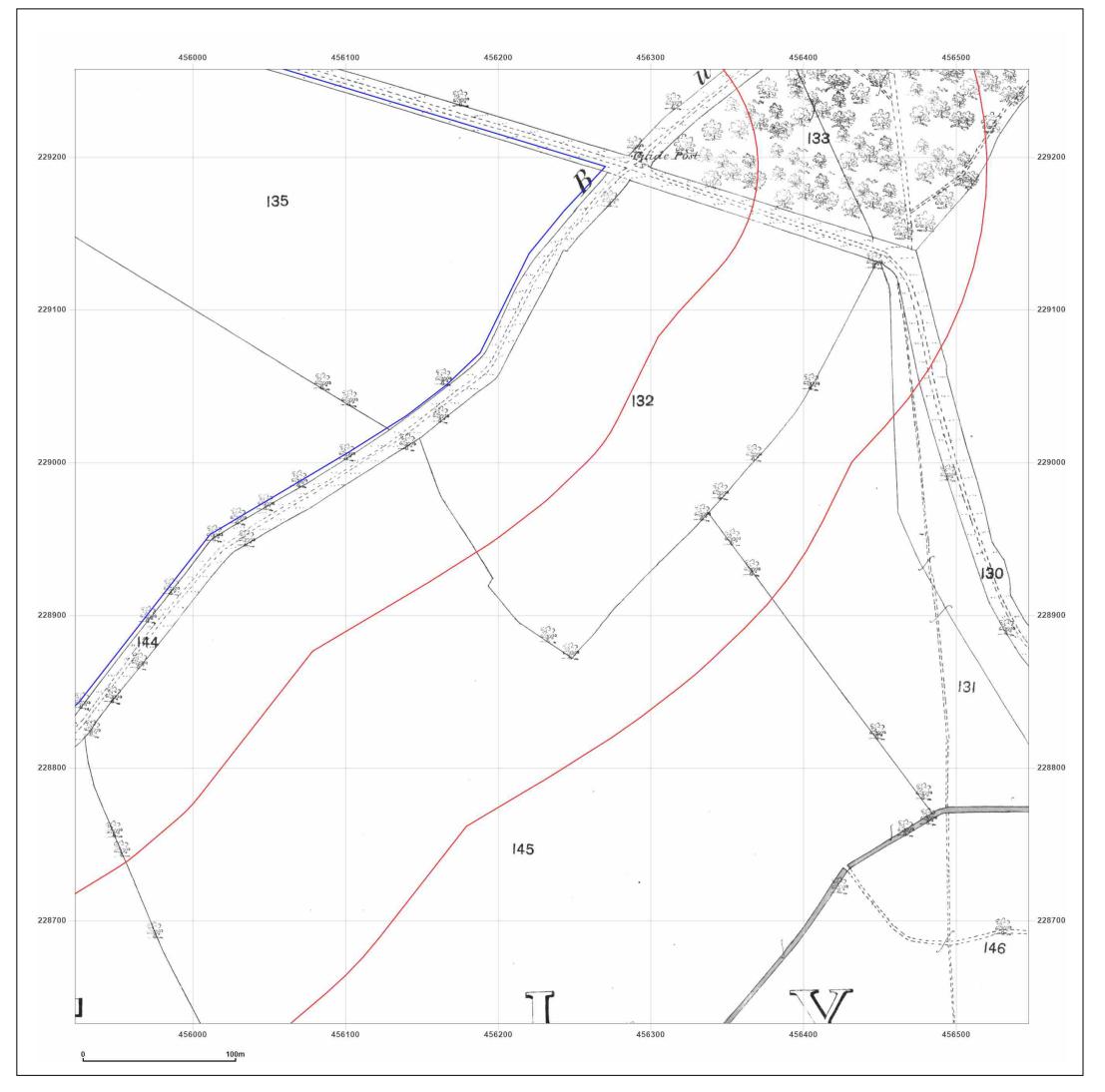


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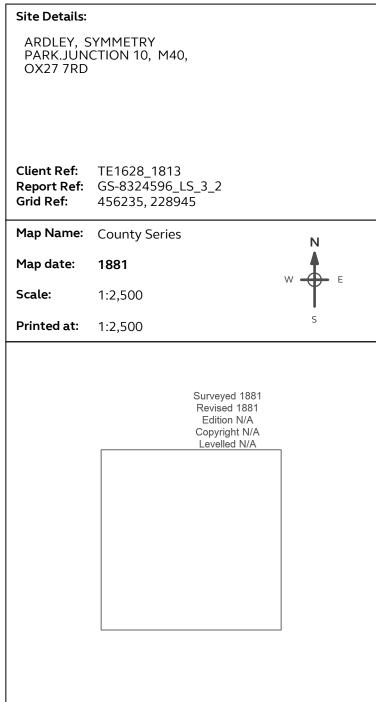
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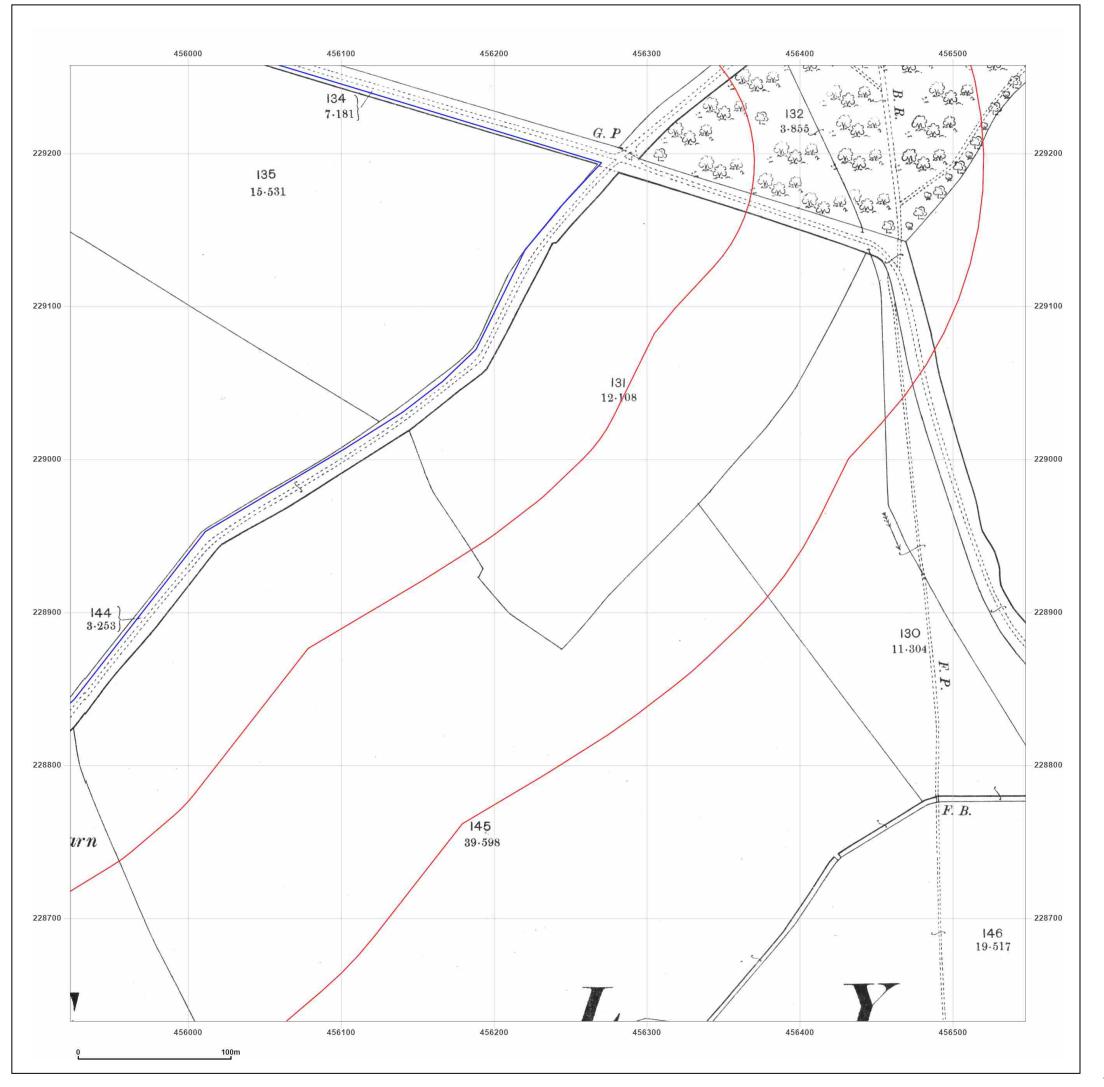




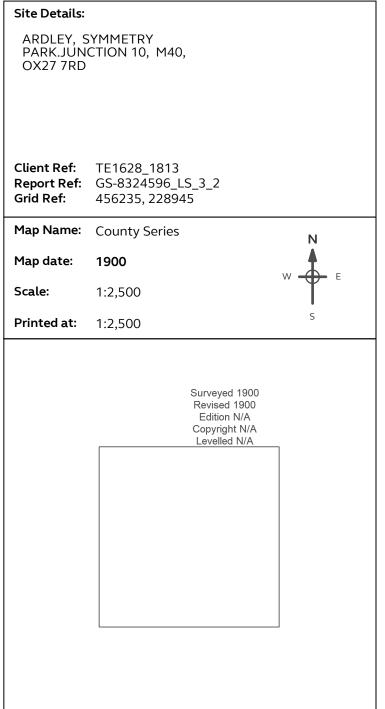
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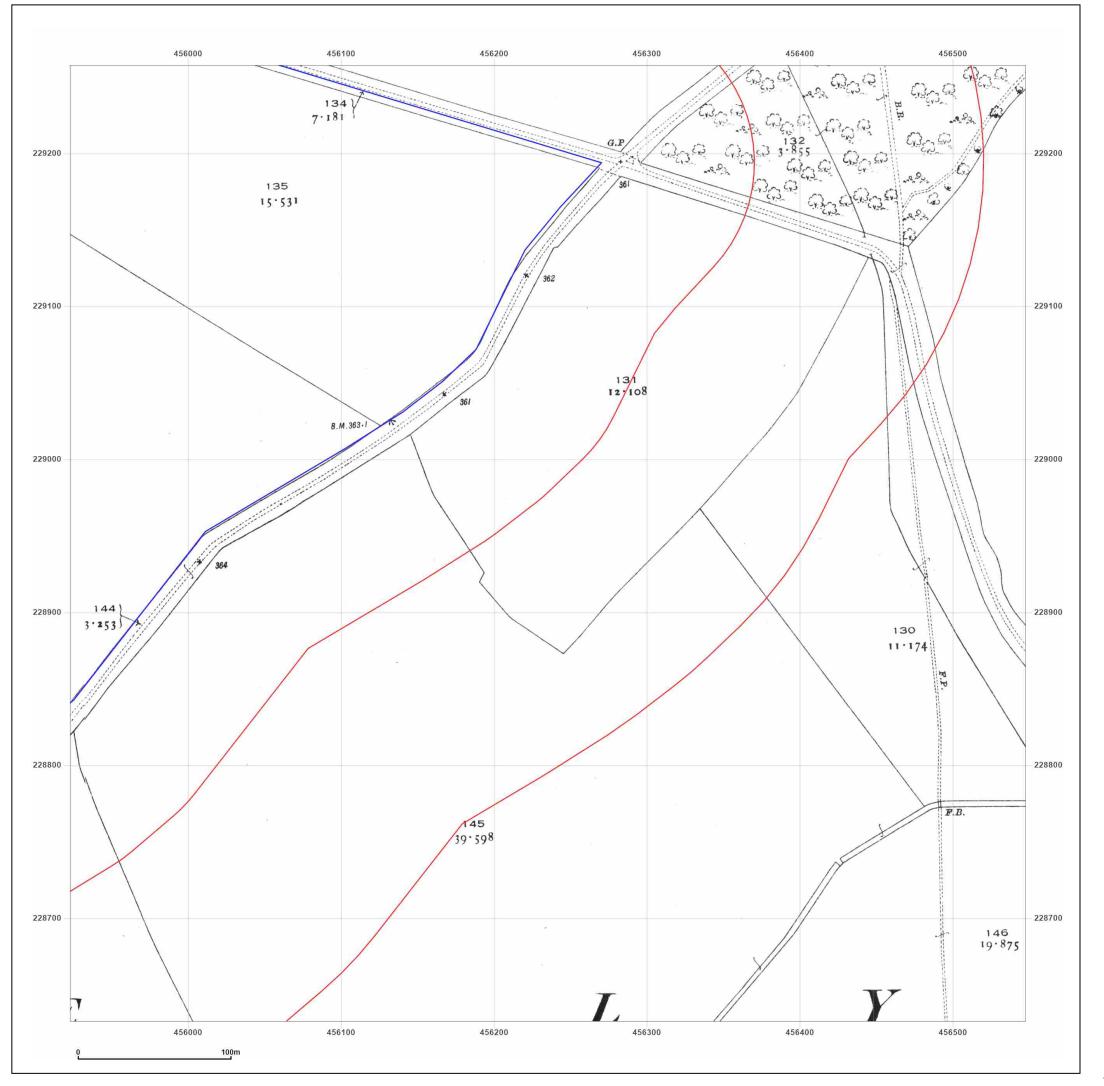




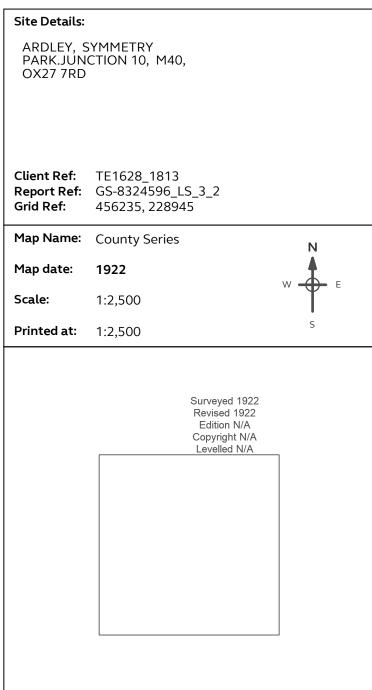
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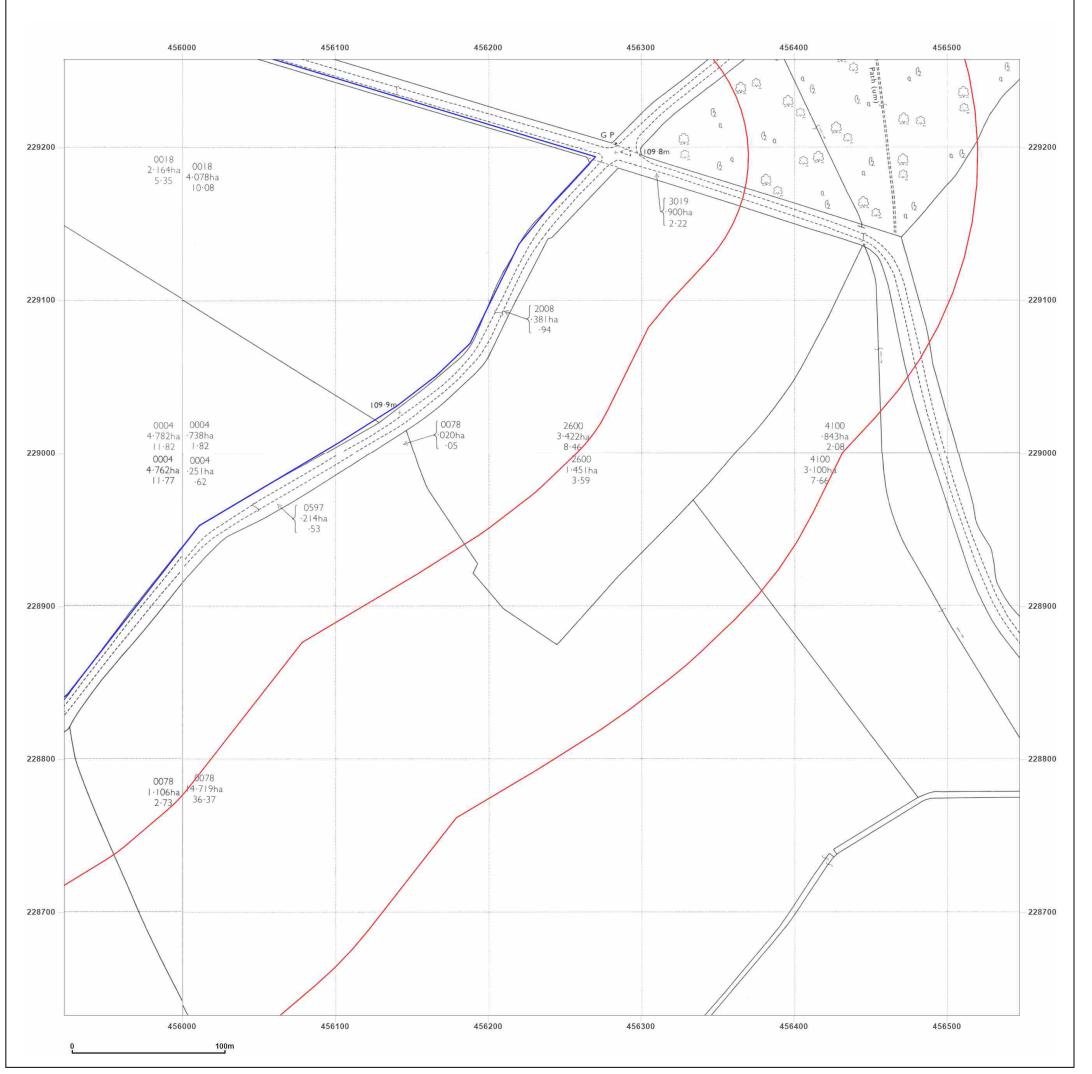




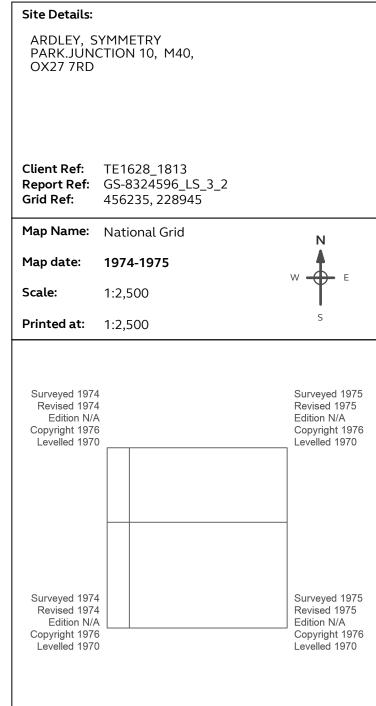
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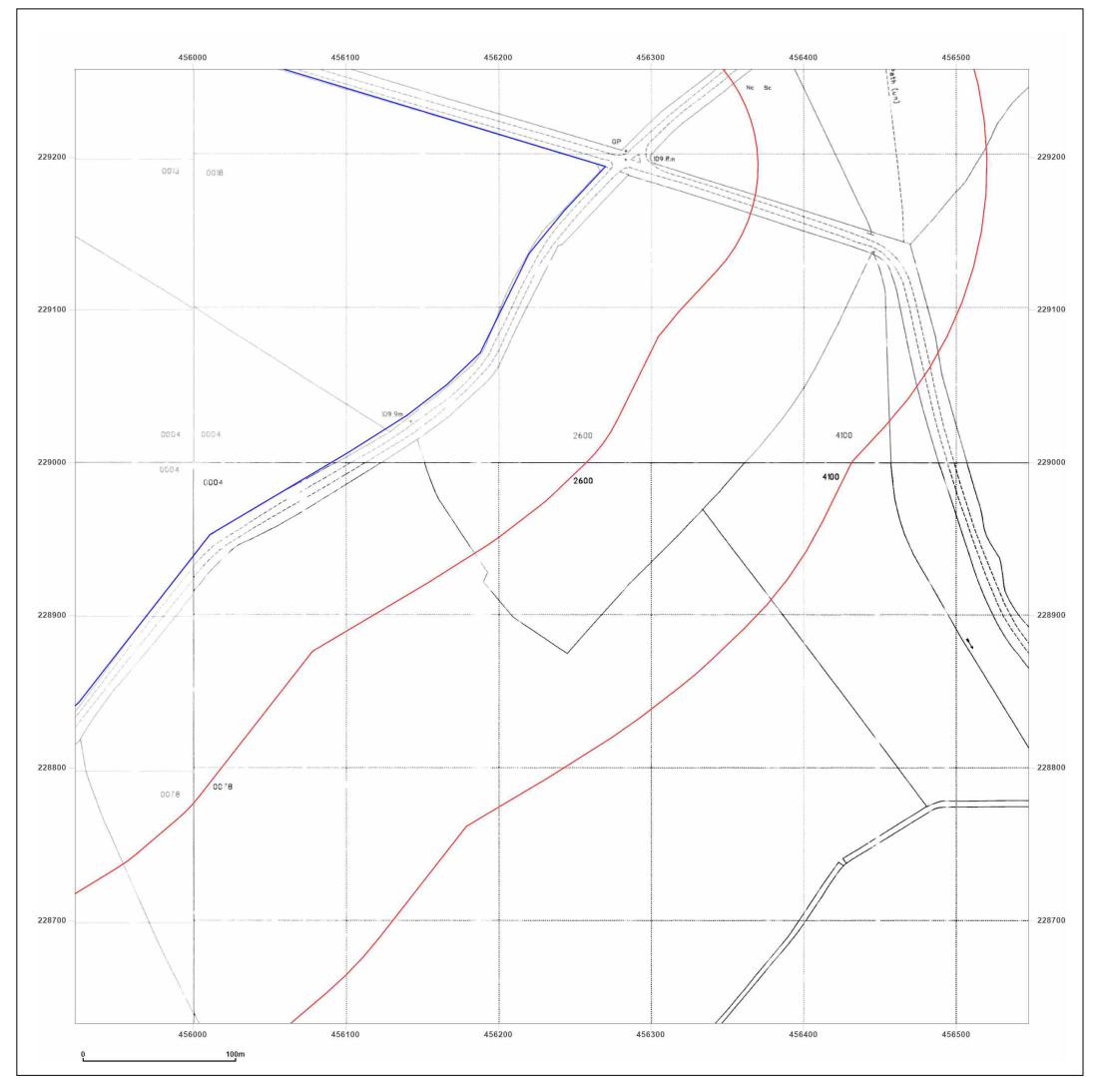




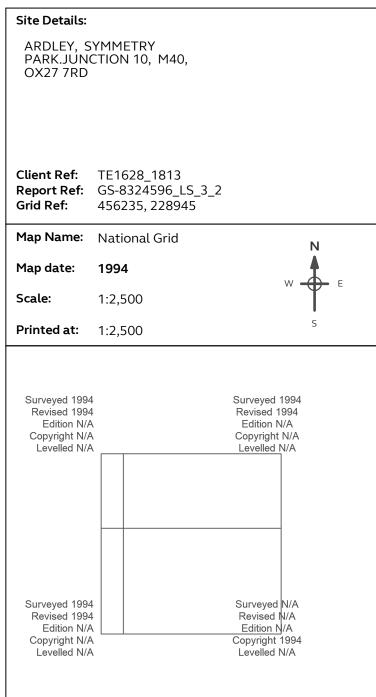
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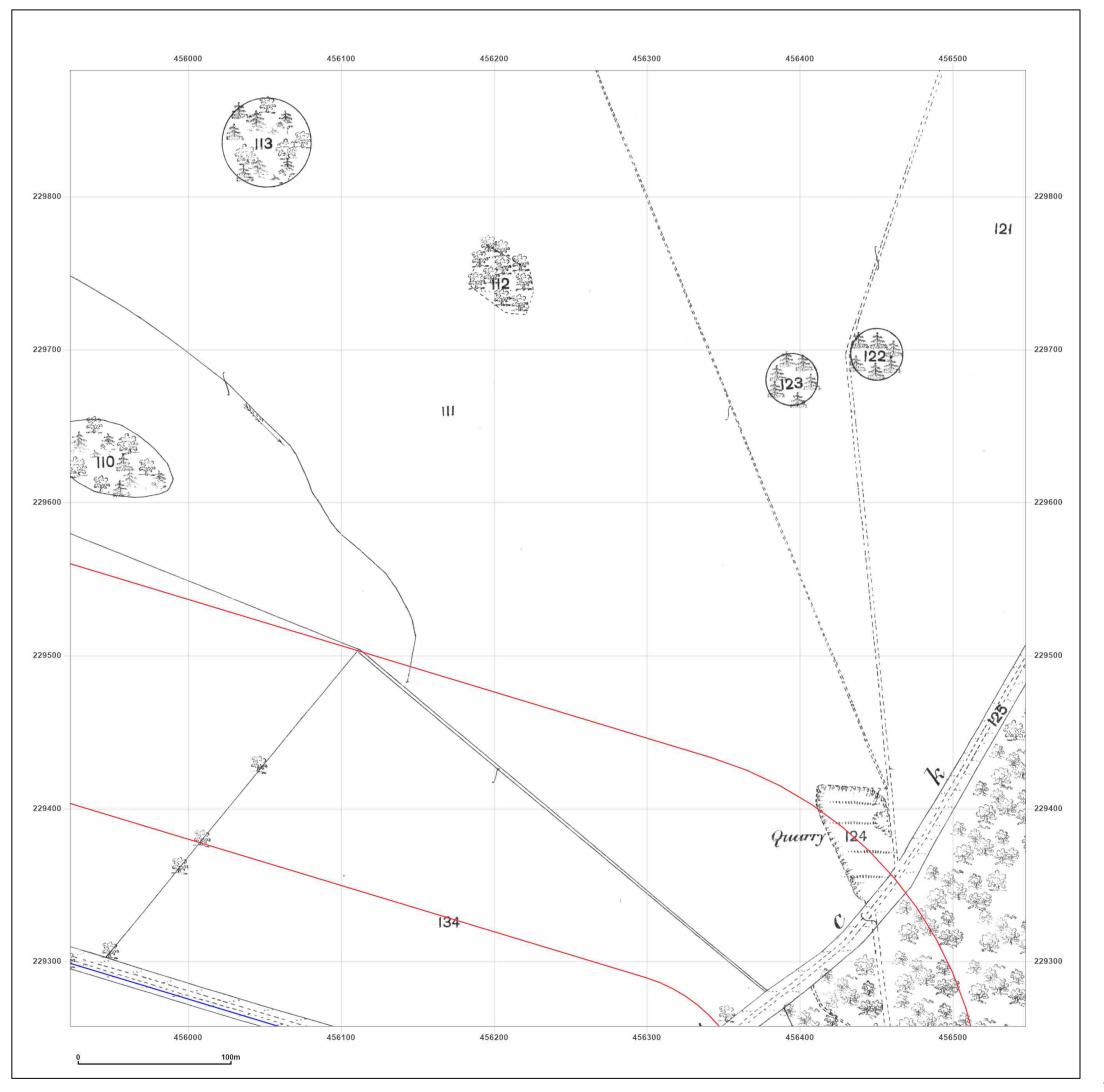




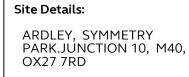
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Production date: 10 November 2021

Map legend available at:







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Report Ref: GS-8324596\_LS\_3\_3
Grid Ref: 456235, 229570

Map Name: County Series

Map date: 1881

**Scale:** 1:2,500

**Printed at:** 1:2,500

Surveyed 1881 Revised 1881 Edition N/A Copyright N/A Levelled N/A

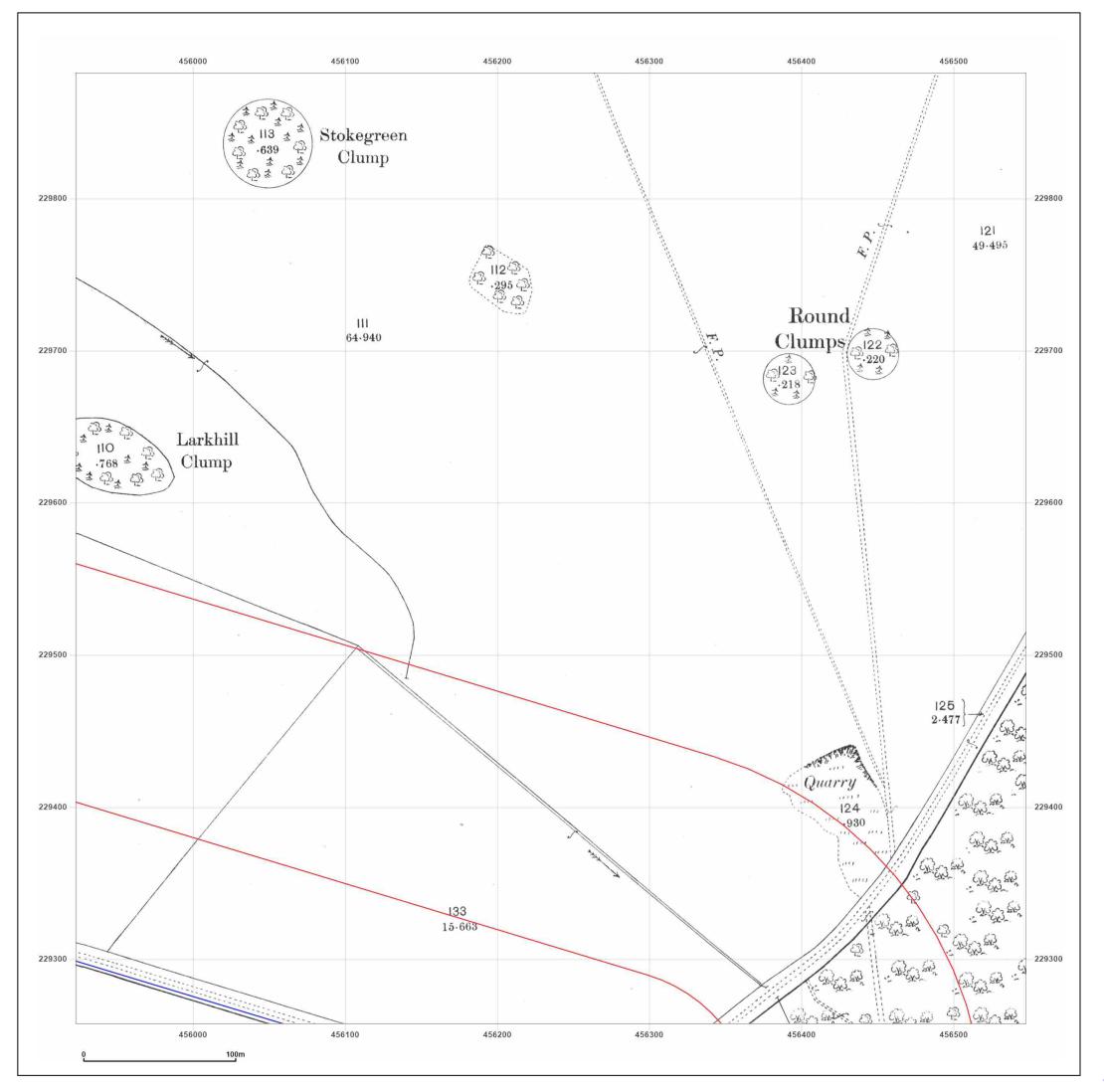


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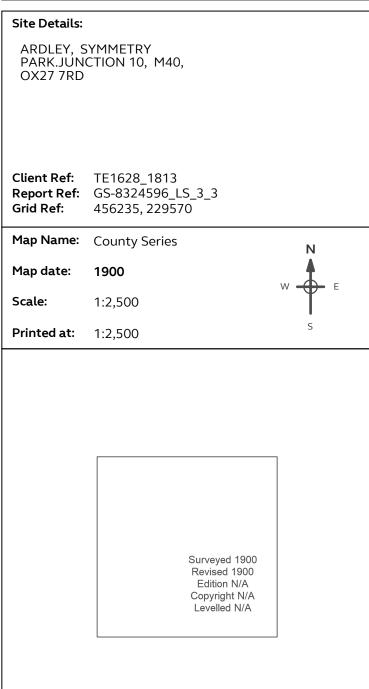
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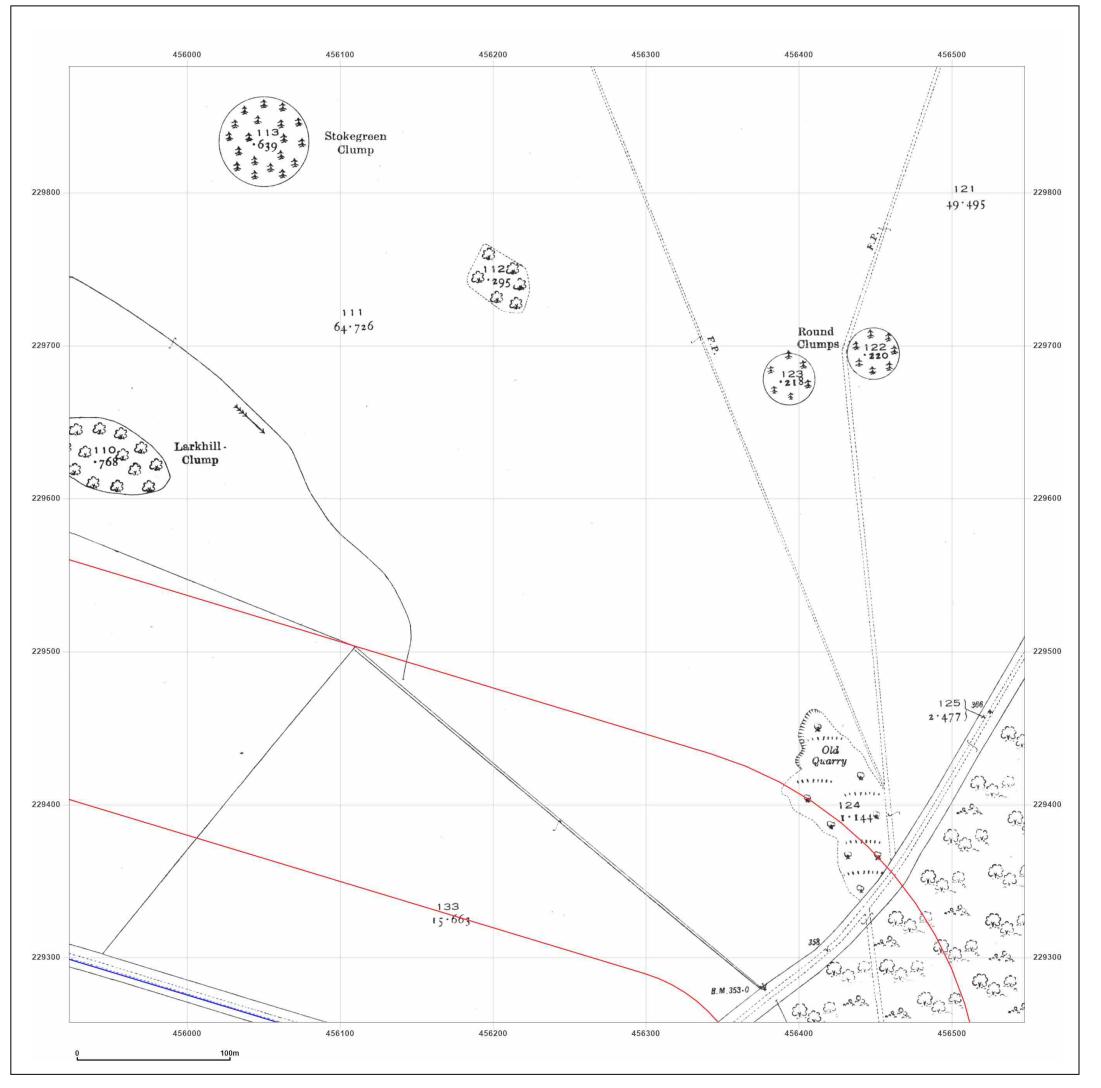




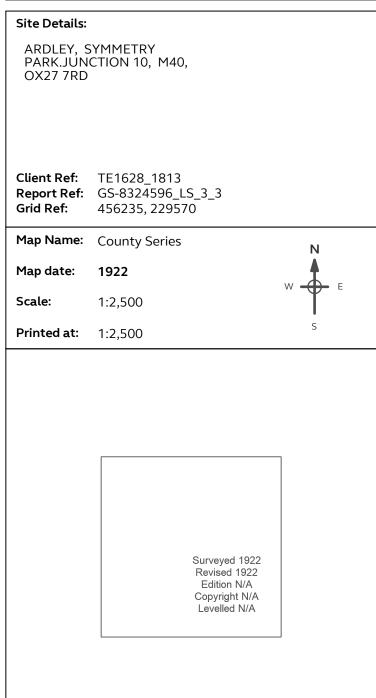
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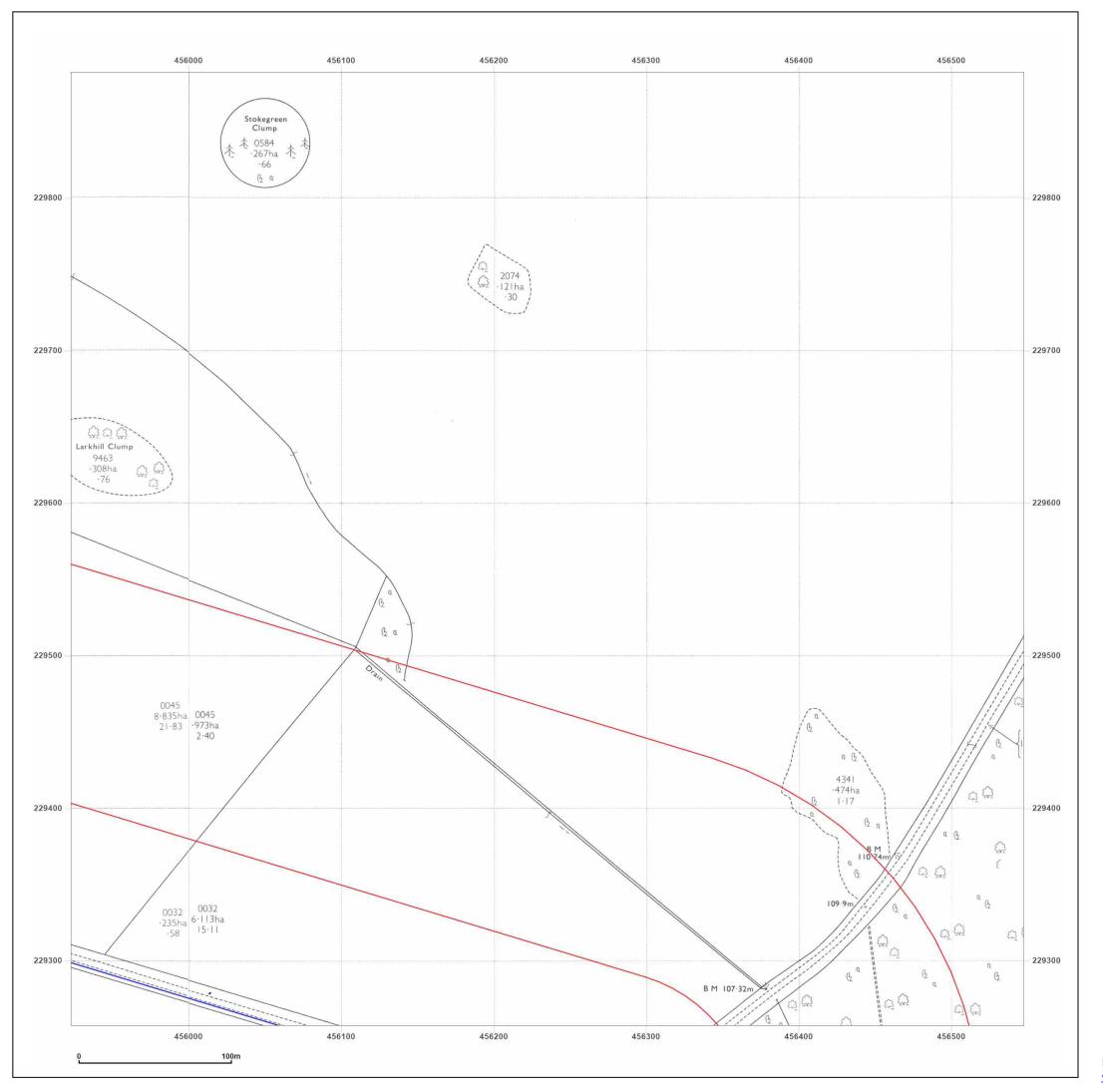




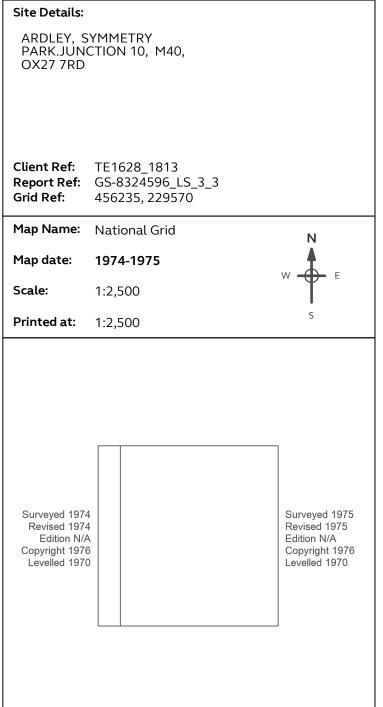
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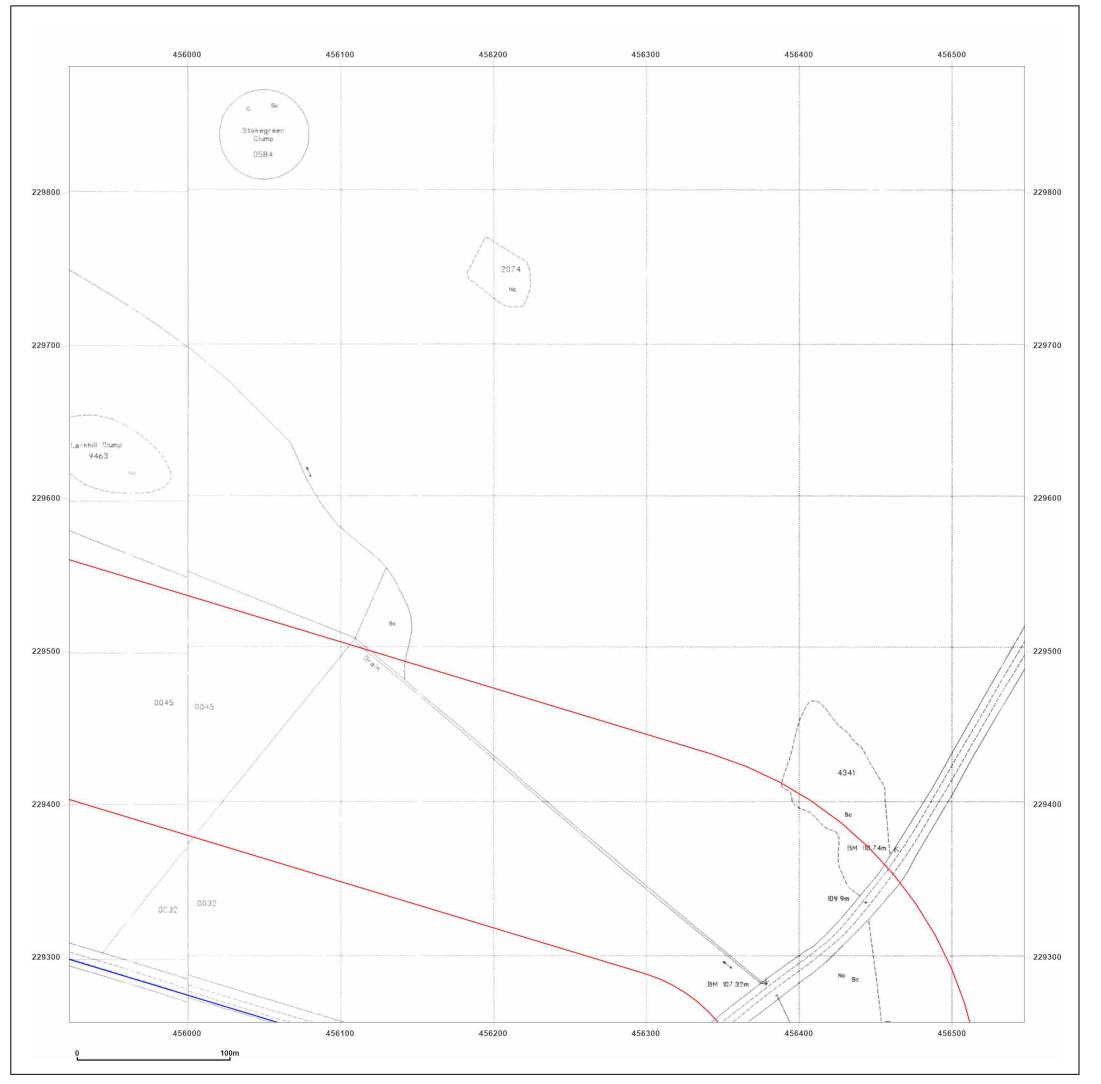




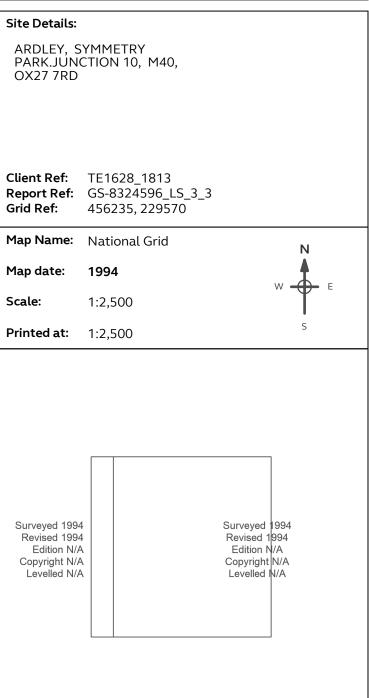
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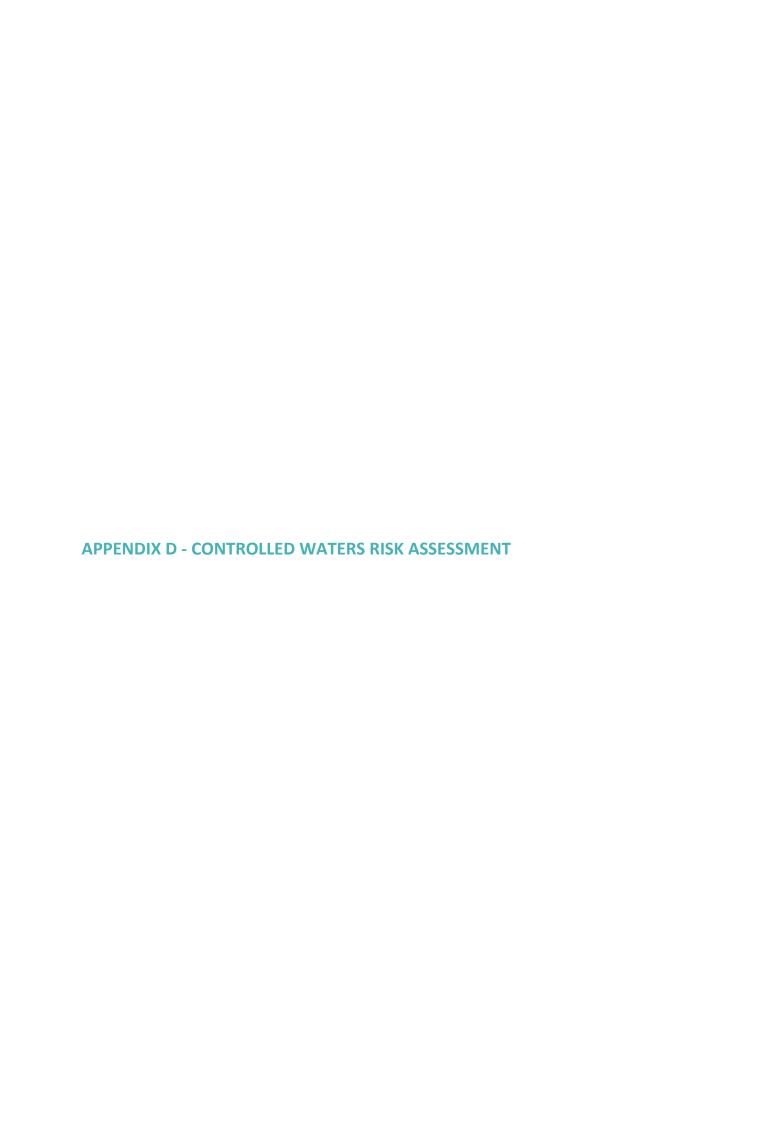
APPENDIX C - DEFINITIONS OF TERMS USED IN QUALITATIVE AND QUANTITATIVE
RISK ASSESSMENTS

# **CIRIA C552 Terminology**

For the qualitative and quantitative assessment of risks posed by potential pollutant linkages have been undertaken using the risk matrix adapted from CIRIA C552 and outlined in the table below.

	Category	Definition
Potential severity	Severe	Acute (short term) risk to human health,
		Major pollution of sensitive controlled waters, ecosystems or habitat.
		Catastrophic damage to buildings or property or crops.
	Medium	Chronic (Medium / long term) risk to human health
		Pollution of sensitive controlled waters, ecosystems or species,
		Significant damage to crops, buildings or structures
	Mild	Easily preventable permanent health effects on humans.
		Pollution of non-sensitive controlled waters.
		Minor damage to buildings or structures.
	Minor	Easily preventable non-permanent health effects on humans, or no effects.
		Minor, low level and localised contamination of on-site soil.
		Easily repairable damage to buildings or structures.
Probability of risk	High Likelihood	Pollutant linkage may be present, and the risk is almost certain to occur , or there is evidence of harm already occurring.
	Likely	Pollutant linkage may be present, and it is probable that the risk will occur over the long term.
	Low Likelihood	Pollutant linkages may be present and there is a possibility of the risk occurring, although there is no certainty that it will do so.
	Unlikely	Pollutant linkage may be present but the circumstances under which harm would occur are improbable.

		Potential Severity	tial Severity			
		Severe	Medium	Mild	Minor	
Probability of risk	High Likelihood	Very high risk	High risk	Moderate risk	Moderate / low risk	
TISK	Likely	High risk	Moderate risk	Moderate / low risk	Low risk	
	Low Likelihood	Moderate risk	Moderate / low risk	Low risk	Very low risk	
	Unlikely	Moderate / low risk	Low risk	very low risk	Very low risk	



## **CURRENT GUIDANCE FOR CONTROLLED WATERS RISK ASSESSMENT**

## **Regulatory Context**

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

"any land which appears to the Local Authority in whose area it is situated to be in such a condition, by reason of substances in, on, or under the land, that:

- (a) Significant harm is being caused or there is a significant possibility of such harm being caused; or
- (b) Pollution of controlled waters is being, or is likely to be, caused."

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

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

Controlled Waters are defined Section 104 of the Water Resources Act 1991. In summary, the comprise relevant territorial waters which extend seaward for three miles from the low-tide limit from which the territorial sea adjacent to England and Wales is measured.

The Environment Agency has powers under Part 7 of The Water Resources Act (1991) to take action to prevent or remedy the pollution of controlled waters, including circumstances where the pollution arises from contamination in the land. This is reinforced in The Contaminated Land (England) (Amendment) Regulations 2012 and Contaminated Land Statutory Guidance (DEFRA, 2012) which came into force in early April 2012.

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

Part IIA places contaminated land responsibility as a part of the planning and redevelopment process, rather than Local Authority or Environment Agency directly, except in cases of very high pollution risk or where harm is occurring. In the planning process, guidance is provided by National Planning Policy Framework (NPPF) of March 2012. The NPPF requires that a site which has been developed shall not be capable of being determined "contaminated land" under Part IIA. Therefore, appropriate risk-based investigation is required to identify the contaminant linkages that can then be assessed, and then mitigated using methods that can be agreed with the planners.

### **Source Protection Zones**

Source Protection Zones (SPZs) are defined by the Environment Agency (for England and Wales), SEPA (Scotland) and the Environment and Heritage Service (Northern Ireland) for groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. The size and shape of a zone depends upon subsurface conditions, how the groundwater is removed, and other environmental factors.

SPZs are classified into four categories:

- Zone 1 (Inner protection zone). Any pollution that can travel to the abstraction point within 50 days from any point within the zone is classified as being inside Zone 1. This applies at and below the groundwater table. This zone also has a minimum 50 m protection radius around the abstraction point. These criteria are designed to protect against the transmission of toxic chemicals and water-borne disease.
- Zone 2 (Outer protection zone). The outer zone covers pollution that takes up to 400 days to travel to the abstraction point, or 25% of the total catchment area, whichever area is the largest. This travel time is the minimum period over which the Environment Agency considers that pollutants need to be diluted, reduced in strength or delayed by the time they reach the abstraction point.
- Zone 3 (Total catchment). This is the total area needed to support removal of water from the abstraction point, and to support any discharge from this.
- **Zone of special interest.** This may occasionally be defined as a special case. This is usually where local conditions mean that industrial sites and other potential sources of contamination could affect the groundwater source, even though they are outside the normal catchment area.

### **Groundwater Vulnerability Assessments**

From 1 April 2010 The Environment Agency Groundwater Protection Policy began to use aquifer designations which are consistent with the Water Framework Directive. These designations reflect the importance of aquifers in terms of groundwater as a resource (drinking water supply) but also their role in supporting surface water flows and wetland ecosystems.

The aquifer designation data is based on geological mapping provided by the British Geological Survey. It is updated regularly to reflect their ongoing programme of improvements to these maps. The maps are split into two different type of aquifer designation:

- Superficial (Drift) permeable unconsolidated (loose) deposits. For example, sands and gravels.
- Bedrock -solid permeable formations e.g. sandstone, chalk and limestone.

The maps display the following aquifer designations:

Table 1. Aquifer Classification ("Geological Classification").

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

# **Environment Agency Guidance**

The Environment Agency's stance on groundwater resources is:

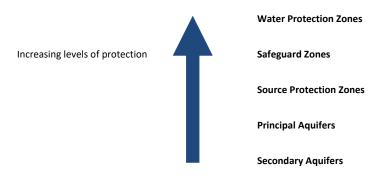
"to protect and manage groundwater resources for present and future generations in ways that are appropriate for the risks we identify" (Groundwater Protection: Policy and Practice GP3, 2012).

At present, the legislation and guidance pertaining to the protection of controlled waters in the UK is complex; however, the core objectives seek to enforce the position given above.

In 1992, the National Rivers Authority published their Policy and Practice for the Protection of Groundwater (PPPG), this document introduced areas of focus for developments such as Source Protection Zones (SPZs) and Groundwater Vulnerability Maps. The Policy was revised in 1998, since which there have been substantial changes in legislation, driven by key European Directives relating to groundwater include the Groundwater Directive (80/68/EEC) and the Water Framework Directive (2000/60/EC). Aspects of these directives are controlled by primary UK legislation such as the Water Resources Act 1991 as amended by the Water Act 2003. Gaps in the 1998 PPPG that emerged as the result of further legislative changes were addressed in the Environment Agency Policy document Groundwater Protection: Policy and Practice (GP3), Version 1 of November 2012. The three main parts of GP3 were:

- Groundwater principals;
- Position statements and legislation; and
- Technical information.

The Environment Agency has a tiered risk based approach to drinking water protection as summarised below:



APPENDIX E -	COMPLYING WITH	CONTROL OF ASBES	STOS REGULATIONS 2012

# Complying with Control of Asbestos Regulations (CAR): Risk Assessments, Licensing and Training

This appendix outlines CAR risk assessments and where they should be applied in relation to assessing and remediating brownfield sites. The information below details the different classifications of work with asbestos under CAR, summarises the legal requirements for asbestos awareness training for all involved in the investigation and management of asbestos containing soil (ACS), and details the potential requirements for suitable proficiency training relating specifically to ACS.

### **CAR RISK ASSESSMENTS**

A CAR Risk Assessment is required for any work which may expose employees to asbestos. It is recommended that a precautionary approach is adopted if there is any doubt about risks associated with asbestos.

There are three main activities for potential asbestos exposure during work on brownfield sites:

- Site reconnaissance visits:
- · Site investigation works; and
- Site remediation.

CAR risk assessments are needed at each stage but may be incorporated during the site investigation stage into the overarching health and safety risk assessments.

The CAR risk assessment must:

- Identify the type of asbestos to which employees are liable to be exposed, where possible, or assume it is present in different forms;
- Determine the type and extent of exposures to asbestos that may occur during the work
- Identify the steps to be taken to prevent exposure or reduce it to the lowest level reasonably practicable; and,
- Consider the effects of control measures that have been or will be taken.

The CAR risk assessment should include any information used to inform the risk assessment such as asbestos reports or desk study information. In the event that this information is not available, the assessor should be assumed that all forms of asbestos may be present on Site.

For all investigation and remediation of ACSs, a detailed written work plan should he produced and followed as detailed on the HSE website and in the CAR

The CAR risk assessments for specific investigations or remediation projects, will determine whether or not work is 'licensable work' (LW), notifiable non-licensable work' (NNLW) or 'non-licensed work' (NLW). In addition, training requirements are also defined by the CAR risk assessment.

Some examples of control measures that apply during site reconnaissance, site investigation works, and site remediation are given below and should be applied depending on the asbestos risks identified for the Site at each stage of investigation:

- Avoiding stirring up dust;
- Cleaning footwear after site works;
- Removing and bagging any overalls for disposal/laundering;
- Respirators and hygiene facilities for high risk sites;
- Segregated welfare units;
- Wetting ground
- Minimising soil disturbances;
- Implementation or retention of capping/break layers;
- Implementation of awareness training;
- Air monitoring;
- Managing stockpiles;
- Area segregation;
- Wheel washing
- Road washing/cleaning

It is important to note that during Site reconnaissance visits, Site investigation works and Site remediation that asbestos should not be considered in isolation and control measures are likely to form part of a wider health and safety precautions.

### Respiratory protective equipment (RPE)

RPE is the last line of defence and its requirement would be defined by the CAR risk assessment. HSE (2013b) advises that RPE should have an assigned protection factor of 20 or more for all work with asbestos. In certain instances, full face-piece, positive pressure respirators with a protection factor of 40 are necessary (to EN 12942:1998, TM3).

Suitable types of RPE for most *short* duration non-licensed asbestos work:

- Disposable respirator to standards EN149 (type FFP3) or EN1827 (type FMP3)
- Half mask respirator (to standard EN140) with P3 filter
- Semi-disposable respirator (to EN405) with P3 filter

These filters are not suitable for people with beards/stubble or for long or continuous use.

#### LICENSING

CAR defined certain types of activities involving asbestos as 'licensable work' (LW) or as 'notifiable non-licensable work' (NNLW). All other work would be 'non-licensable work' (NLW).

#### LW is defined as:

- work where exposure is not 'sporadic and low intensity'
- work where the risk assessment cannot demonstrate that the control limits (four hour and 10 minute limits) will not be exceeded
- work on asbestos coating
- work on AIB or insulation where risk assessment is either of first two points above or not of short duration (where short duration is defined for any work liable to disturb asbestos as taking less than two hours per week (including ancillary work) and no one person carries out that work for more than one hour').

#### NNLW includes work with:

- AIB or asbestos insulation of short duration that is not licensable
- fire-damaged asbestos cement or asbestos cement damaged so as to create significant dust and debris
- asbestos ropes, yarns, woven cloths in poor condition or handling cutting or breaking up the materials
- asbestos papers, felts and cardboard in poor condition, unencapsulated or not bound into another material.

Work with weathered asbestos cement, air monitoring and collecting samples of ACM in buildings would not normally be notifiable.

It is impossible to specify definitively what activities will and will not be licensable. This decision should be made as part of the CAR risk assessment. CAR is not primarily aimed at work with ACSs and there is little published information on airborne asbestos concentrations during work with ACSs. Nevertheless, CAR will require some remediation projects, and occasionally site investigations, to be LW. Investigations on other sites may involve NNLW. The decision as to whether work is LW or NNLW should be made during the CAR risk assessment by those in charge of the brownfield site investigations and remediation projects.

### TRAINING REQUIREMENTS

Asbestos health and safety courses are offered by a number of providers in the UK. Training courses that include the problem of identifying ACMs in soil should be undertaken at regular intervals by those involved in the investigation, assessment and management of sites where ACs are known or suspected. It is the role of the employer to identify the level of training required for an employee based on their role, experience and duties. Reference to Regulation 10 of CAR should be referred to for more information on training requirements.

Recognising asbestos within soils is challenging due to the heterogeneity of such soils and the discolouration of asbestos by smeared soil. Specific training for ground workers should include understanding fibre release potential, potential control measures in the field, how to take representative ACSs safely, sample labelling and what analytical tests are available and when the y should be implemented.

Health and safety training required under CAR includes asbestos awareness, non-licensable work (including notifiable non-licensable work) and licensable work with asbestos.

In addition to health and safety training, some staff involved in the technical identification on site of ACMs, sampling and analysis may require technical proficiency training (competency training).

### **Training vs. Competence**

HSE (2005) identifies that 'training alone does not make people competent. Training must be consolidated by practical experience so that the person becomes confident, skilful and knowledgeable in practice on the job'. It is critical that ACS surveyors demonstrate competency with details of relevant field experience alongside training and examples of previous works/references.