

Remediation & Verification Strategy

Sarum Academy, Westwood Road, Salisbury,
Wiltshire, SP2 9HS

Presented to: Morgan Sindall Construction

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Table of Contents

1.0	INTRODUCTION	1
1.1	Appointment	1
1.2	Context & Purpose	1
1.3	Scope of Works	1
1.4	Limitations	2
2.0	SITE CONTEXT	3
2.1	Site Information	3
2.2	Planning	5
2.3	Environmental Setting	5
2.4	Contamination Summary	6
2.5	Conceptual Site Model	7
2.6	Data Gaps and Uncertainties	7
3.0	REMEDIAL STRATEGY	8
3.1	Introduction	8
3.2	Remediation Options	8
3.3	Stakeholders	9
3.4	Overview	9
3.4.1	Enabling Phase	9
3.4.2	Construction Phase Works	9
4.0	PRE-CONSTRUCTION REMEDIAL WORKS	10
4.1	Background	10
4.2	Demolition and Site Clearance	10
4.3	Excavation, Breaking and Processing of Sub-Surface Structures	10
4.3.1	Localised contaminated soils	10
4.3.2	Existing hardstanding, structures and	10
4.3.3	Relict Drainage	10
4.3.4	Health and Safety	10
4.4	Disposal of Water	11
4.5	Environmental Management	11
4.6	Addressing Previously Unidentified 'Hotspots' of General Contamination	12
4.6.1	Background	12
4.6.2	Protocol	12
4.7	Materials Management	12
4.7.1	Materials Management for Earthworks	12
4.7.2	Asbestos in Soils - Earthworks	13
4.7.3	Re-use of hard materials	13
5.0	CONSTRUCTION PHASE REMEDIAL WORKS	14
5.1	Certified Clean Topsoil / Subsoil Layer - Cover System	14
5.2	Imported Materials and Verification	14
5.2.1	Pre-Importation Testing	14
5.2.2	Post-Placement Verification	15
5.2.3	Cover systems and other potentially interacting site works	16
5.2.4	Site Won Materials	16
5.2.5	Radon Protective Measures	17
5.3	Water Pipes and Below Ground Utilities / Structures	17
5.3.1	Background	17
5.3.2	Standard Pipe Materials / Upgraded Pipe Material Requirements	17
5.3.3	Clean Service Corridors	17
6.0	VERIFICATION REPORTING & REGULATORY APPROVALS	18
6.1	General	18
6.2	Verification - Enabling Phase	18
6.3	Regulatory Approvals and Planning Condition Discharge	18

DRAWINGS

Drawing 1 - Proposed Development Plan

FIGURES

Figure 1 – Site Location Map

APPENDICES

Appendix A – Limitations

Appendix B - 'Hotspot' Protocol

Appendix C – Imported Soils Assessment Criteria

Appendix D – Inspection Pit and Testing Frequencies

1.0 Introduction

1.1 Appointment

Lucion Delta-Simons Limited ("Lucion") was instructed by Morgan Sindall Construction (the "Client") to produce a Remediation and Verification Strategy (RVS) for Sarum Academy, Westwood Road, Salisbury, Wiltshire, SP2 9HS (the "Site").

The Site is subject to Planning Permission reference PL/2026/00589, which relates to the wider redevelopment of the Site, including the proposed construction of a new 10 Form Entry (10FE) school and associated external works.

In addition, a subsequent hybrid planning application was submitted to Wiltshire Council under reference PL/2026/00589 on 23 March 2026. This application remains pending determination at the time of report issue and relates to the wider redevelopment proposals for the Site.

1.2 Context & Purpose

The purpose of this document is to:

- Present a summary of remediation requirements;
- Contribute to a sustainable development "*which meets the needs of the present without compromising the ability of future generations to meet their own needs*" as advocated by, for example, Surf UK guidance¹;
- Provide a formal statement for the likely scope of remediation requirements to facilitate the proposed development at the Site; and
- Support the discharge of planning conditions relating to land contamination.

For information on the Site setting, and full details of desk-based study and intrusive investigations undertaken at the Site, this Remediation Strategy and Verification Strategy should be read in conjunction with third-party reports as follows:

- Soils Limited, Main Investigation Report - Sarum Academy, Westwood Road, Salisbury, Wiltshire, SP2 9HS, dated March 2026, Ref. 22247/MIR Rev1.01;
- Soils Limited, Hazardous Waste Online Classification Report, dated May 2026; and
- White Young Green Environmental (WYG), Ground Conditions Assessment Report, dated June 2011, Ref. A070001.

It should be noted that this Remediation and Verification Strategy report has been based solely on the above third-party data and no intrusive ground investigation works have been completed by Lucion Delta-Simons Ltd at the Site.

It is our understanding that Morgan Sindall Construction has full reliance on the third-party data.

1.3 Scope of Works

The scope of works undertaken for this assessment was to:

- Summarise the site setting and confirmed contaminant linkages;
- Establish the remediation objectives and metrics;
- Complete an initial remediation screening exercise;
- Select a preferred remediation approach; and,
- Present the remediation and verification strategy.

The above is based on the third-party reports detailed in Section 1.2.

i

1.4 Limitations

This document sets out the measures that will be carried out during the construction to mitigate potentially significant risks as identified by the previous investigations and assessment in the context of the proposed end-use of the Site, it does not provide a verification or completion statement for the works. The standard limitations associated with this assessment are presented in Appendix A. In addition, there are the following specific limitations that apply to this assessment:

This document is based on data provided in third party reports. It is assumed that this information is accurate and was undertaken in accordance with current best practice guidance and legislation.

2.0 Site Context

2.1 Site Information

Site Overview			
 Contains Google, Imagery ©2026 Airbus, Maxar Technologies, Map data ©2026 Google			
Co-ordinates	Centred approximately at National Grid Reference 411576, 131839.	Elevation (approx.)	99.3 – 100.3 m AOD (metres above Ordnance Datum)
		Area	Approx. 12 Ha (hectare)
Site Address and Location	The subject Site is located within Sarum Academy, Westwood Road, Salisbury, Wiltshire, SP2 9HS. An indicative Site boundary has been provided by the Client and is provided as Figure 1 and outlined above. Google Maps Link Google, Imagery ©2026 Airbus, Maxar Technologies, Map data ©2026 Google		

Site Description	The specific location of the subject Site within the existing Sarum Academy pertaining to this report is detailed by the red line boundary on the plan above and comprises an existing playing field laid to grass and an area to the east of the playing field occupied by access tracks, existing hard standing, small structures and soft landscaping. The Sarum Academy Site comprises a main school building which is a three-storey structure positioned within the central area of the site, accompanied by several single-storey outbuildings to the north. To the south and south-west of the main building were extensive playing fields and a multi-use games area (MUGA) pitch. Additional hardstanding areas, including playgrounds and parking facilities, were located to the north and west of the school building, while a further sports pitch was situated to the north-west. The general topography of the Site was noted as flat and level in the third-party reports. The playing fields comprised maintained grassed areas, while soft landscaping to the north of the main building included lawns, small shrubs, and occasional semi-mature trees. Dense woodland boundaries containing mature trees enclosed the site to the north, west, and south, providing substantial natural screening. The surrounding area was characterised by a mix of undeveloped and residential land uses. To the north and west lay open fields and agricultural land, while a disused quarry was located to the south beyond the playing fields. Residential housing estates bordered the site to the east.
Site History	The Site has been occupied by a school since the 1950s and has undergone a series of extensions leading to the present-day layout. The southern part of the Site is currently used as school playing fields, and the northern part is an open public space. Neighbouring land uses have historically and currently comprised agricultural land to the north and northwest, inactive chalk quarry to the south and residential area to the east.
Proposed Development Description	An indicative drawing by Stantec (ref. 75CC13-STN-ZZ-ZZ-DR-S-0200) identifies the localised proposed development footprint highlighted in blue. The drawing is included as Drawing 1. It is understood that the development forms part of a hybrid planning application, with Phase 2A comprising: • Works to the existing Sixth Form block to facilitate its conversion for sports use, reflecting the reduced requirement for Sixth Form accommodation due to declining pupil numbers; • Construction of a new approximately 990 sq m two-storey Science Block comprising Science classrooms, laboratories, and associated accommodation, together with external hard and soft landscaping works; • Construction of a weather-protected link between the existing and proposed teaching blocks; and • Installation of a new artificial turf pitch, including floodlighting and multi-sport line marking, representing an upgrade to the existing grass pitch, which currently exhibits poor drainage characteristics. The proposed development for the area highlighted in blue is a new two-storey teaching block located on the central portion of the Site. The wider area of the development will consist of refurbishment works to the proposed fitness (Block 4593), relandscaping to the existing multi-games area (MUGA) and further soft relandscaping works in the central area of the Site with stripping and regrading of the adjacent field area by approximately 450mm depth.

2.2 Planning

Planning Permission is pending for the hybrid application for a 10 Form Entry (10FE) school, which is for the wider redevelopment of the Site. The Planning Application Notice submitted to Wiltshire County Council (Ref. PL/2026/00589) on 23rd March 2026 is currently awaiting decision at the time of report issue, however the following environmental conditions are anticipated to be imposed:

Planning Conditions	The Local Planning Authority (LPA) has subsequently attached a planning condition requiring: • An asbestos risk assessment by a suitably qualified asbestos consultant; • Submission of a remediation scheme where asbestos contamination is identified; • Implementation of approved remediation measures; and • Submission of a verification report upon completion of remediation works. There is a general understanding the proposed development comprises: • Construction of a new building within the identified development footprint; and • Reduction/stripping of the adjacent playing field by approximately 450 mm.
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2.3 Environmental Setting

Geology	Based on information obtained from publicly available sources and previous investigations, the ground conditions across the Site generally comprise the following: <u>Ground summary from 2026 Soils Limited Report – Site specific</u> Made Ground was encountered in the majority of exploratory locations from ground level to depths of approximately 0.40 m to 1.70 m bgl (metres below ground level). The Made Ground typically comprised slightly sandy, gravelly clay with flint, chalk, sand, and anthropogenic materials including clinker, brick, metal wire, concrete, and wood fragments. Head Deposits were encountered beneath the Made Ground in most locations, extending to depths of approximately 2.10 m to 13.50 m bgl. These deposits typically comprised firm sandy gravelly clay or clayey gravel with flint and chalk and are generally considered variable in composition. The Newhaven Chalk Formation was encountered beneath the Head Deposits at depths ranging from approximately 2.10 m to 13.50 m bgl. In individual locations, chalk was proven from as shallow as 3.18 m bgl (TTP6, located to the east of the proposed MUGA pitch) and extended to the proven base of the deepest boreholes at up to 25.00 m bgl (CH1 and CH2). In CPT locations, the chalk was inferred beneath the Head Deposits to depths of approximately 14.20 m to 25.78 m bgl, depending on location. A groundwater seepage was only recorded in one location at approximately 1.15 m bgl and was considered likely to represent perched water within the Made Ground, potentially influenced by rainfall and seasonal conditions at the time of the investigation. <u>Ground summary from 2011 WYG Report – Wider area of the Site</u> The WYG investigation identified limited Made Ground across the Site, encountered only within BH1, TP01 and TP03. The Made Ground comprised asphalt, sub-base gravel, sandy gravelly clayey silt and isolated construction-related materials such as concrete, sandstone paving fragments and clay pipe fragments. No evidence of contamination was identified within these materials.
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	Topsoil was encountered across the majority of exploratory locations to depths between approximately 0.25 m and 0.50 m bgl, generally comprising gravelly sandy silt with flint gravel and rootlets. Underlying the topsoil, Head Deposits were encountered across all exploratory positions to depths ranging between approximately 0.90 m and 6.20 m bgl. These deposits generally comprised medium dense granular soils of sandy silty flint gravel, with occasional gravelly clay horizons identified locally. Newhaven Chalk Formation was encountered beneath the Head Deposits in exploratory positions that fully penetrated the superficial strata. The chalk surface was identified between approximately 0.90 m and 6.20 m bgl and was noted to vary in grade and structure with depth, generally improving in competency at greater depths. No evidence of contamination was identified within the chalk strata. No groundwater was encountered during the WYG ground investigation.
Hydrogeology	The Environment Agency's (EA) magic.defra.gov.uk provides the following aquifer classification and designations; Head Deposits across the Site is classified as a Secondary A Aquifer and the Newhaven Chalk Formation is classified as a Principal Aquifer. The Site is located within a groundwater Source Protection Zone, situated on the edge of the outer protection zone. In addition, the closest groundwater abstraction is located approximately 195m to the southwest of the Site associated with the chalk quarry. The findings from the March 2026 Soils Limited Report indicated groundwater seepage was recorded in TTP7 at 1.15m bgl, which is likely perched water within the Made Ground. It must be noted the depth investigated is to 25m bgl and no deeper water body was recorded. The 2011 WYG investigation did not record any groundwater during the intrusive works. Additionally, subsequent monitoring of standpipes installed between 2.70 m to 6.0 m bgl did not indicate the presence of groundwater within these depths.
Hydrology	The nearest surface water feature is the River Nadder, a tributary of the River Avon, located approximately 580 m south of the proposed Site.
UXO	Preliminary review indicates a low risk of unexploded ordnance (UXO) across the Site. The Principal Contractor will be responsible for implementing appropriate measures to manage and mitigate any risks associated with below ground activities. It is understood that a Detailed UXO Assessment Report has been prepared by Zetica UXO ref. P2277-25-R1 dated 10th June 2025, which identified the Site to be at a low risk from unexploded ordnance.
Archaeology	It is noted in the July 2025 Cotswold Archaeology report that there is a very low potential for archaeological remains to be present on site.

2.4 Contamination Summary

March 2026 Soils Limited Report highlights the following pertaining to the specific Site area:

- Asbestos was found within one sample taken within the Made Ground at location TTP2 at 0.10 m bgl within the footprint of the proposed 2-storey teaching block. The quantitative analysis carried out indicated Chrysotile fibres were present within the sample, with the concentration recorded at 0.002% w/w.

2.5 Conceptual Site Model

The following linkages have been previously confirmed as being relevant to the proposed development and warranting mitigation.

Confirmed Linkages	Source Descriptions	Pathway	Receptor
Linkage 1	Asbestos identified in the Made Ground at TTP2 at 0.10 m bgl (TTP2.1 and TTP2.2)	Inhalation	End Users of the Site (staff and pupils)
Linkage 2			Construction-phase staff

2.6 Data Gaps and Uncertainties

The conclusions and recommendations contained within this report relate solely to the localised proposed development works described in Section 2.1 and should not be extrapolated to wider areas of the site outside the currently proposed development footprint.

3.0 Remediation Strategy

3.1 Introduction

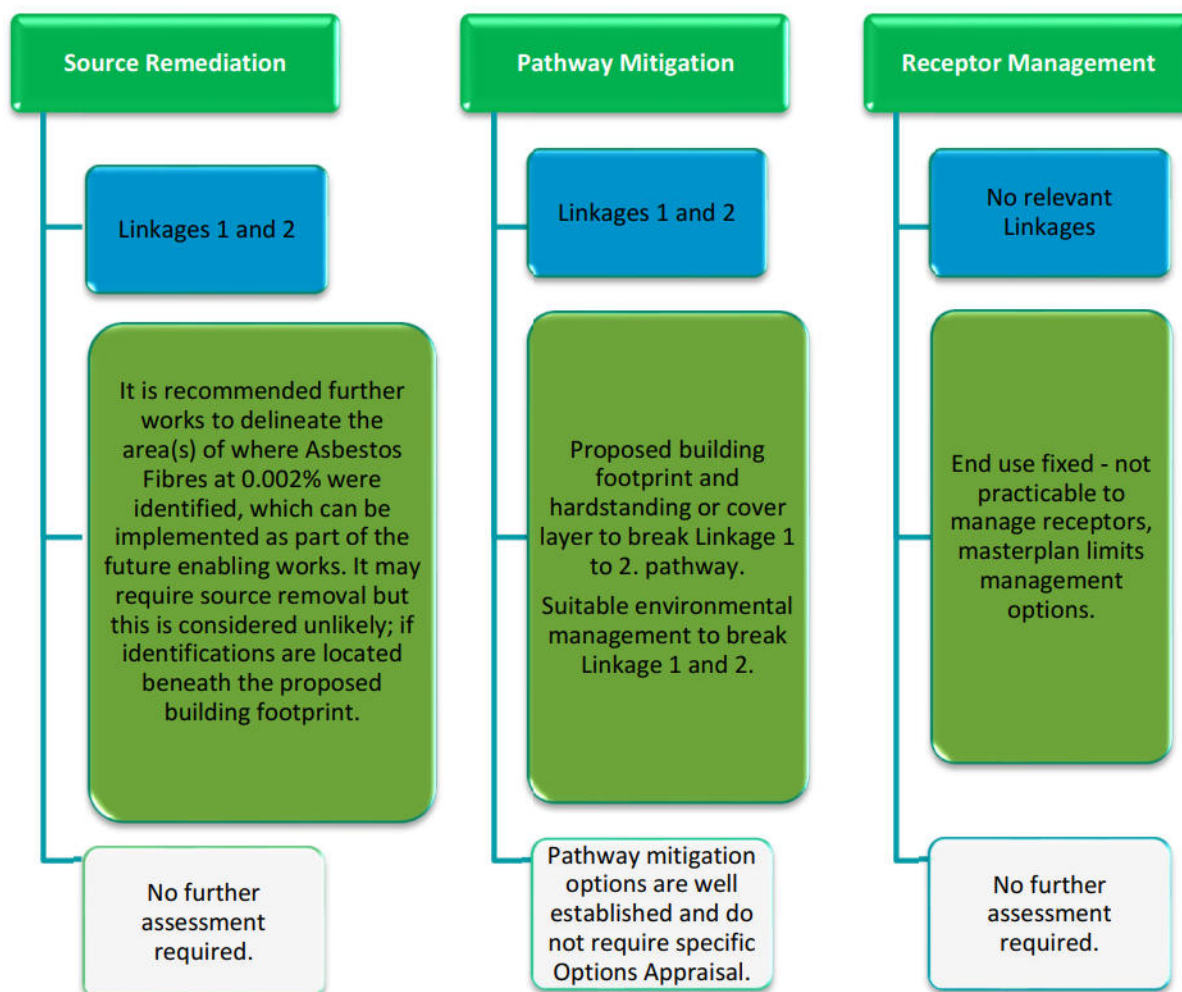
The presence of land contamination is generally only of concern if an actual or potentially unacceptable risk exists to either the health of living organisms (i.e. humans, flora, fauna), ecological systems, property and controlled waters (i.e. rivers, aquifers etc.). Planning policy states that the Site should be 'suitable for use' and that, 'after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990'.

3.2 Remediation Options

Current UK guidance requires due consideration of sustainability indicators in the appraisal of remediation options. Reference has been made to land contamination risk management (LCRM) and the Sustainable Remediation Forum UK (SURF UK framework) and this strategy broadly reflects the approach in those documents at the scale appropriate for the Site, scale of issues, and proposed development. Remediation options fall into one of three categories: Undertaking remediation of the contamination source; Mitigation of migration pathways; or Receptor management.

Remediation strategies may incorporate a combination of techniques across the three categories to achieve the most effective and sustainable solution. The table below provides a high-level screen of remedial approaches to the identified linkages.

The following table provides a high-level screen of remedial approaches to the identified linkages:



3.3 Stakeholders

Parties Anticipated to be Involved	Function / Interest / Likely Timing of Involvement
Client	Morgan Sindall Construction
Principal Contractor - Morgan Sindall Construction Demolition Contractor - tbc	Contractor (for each phase of works) / Delivery of Development Delivery of Development / MMP - CEMP permitting
Lucion Delta-Simons Limited	Land quality risk assessment
Environment Agency	Regulation relating to Controlled Waters and Waste
Wiltshire County Council (CLO)	Regulation relating to Human Health

3.4 Overview

The Site remediation strategy has been devised based on the third-party reports undertaken by WYG in June 2011 and Soils Limited undertaken in March 2026. This is to mitigate the risks posed to future site users by the identified contaminants of concern and break potential contaminant linkages allowing the redevelopment of the two-storey teaching block. The key features of the remedial strategy are summarised below:

3.4.1 Enabling Phase

- Excavation, breaking out and processing of below ground structures, slabs/relict foundations, hard materials and visually inspect concrete for asbestos (ACMs) prior to crushing (as required);
- Process and stockpile crushed material for reuse, subject to comprehensive testing and inspection from evidence of ACMs (as required).
- A Materials Management Plan (MMP) for proposed areas of reduce dig by 450mm below ground level (ref. FS0402-SWH-00-XX-D-C-6230) within areas of the proposed Multi-Use Games Area (MUGA), which is to be replaced with 2G artificial grass and within the area to the east of the teaching block due to the proposed relandscaping works;
- For localised asbestos works refer to Asbestos Management Plan by Lucion (ref. 151028.729345);
- Documentation of reused hard materials consisting of crushed concrete under WRAP protocol (if applicable); and
- Upfilling of areas of the Site using chemically and geotechnically suitable materials.

3.4.2 Construction Phase Works

- Provision of a clean cover system in proposed soft landscaped areas of the Site (as required);
- Verification of the clean cover system by an environmental consultant to confirm depth and chemical / physical suitability of the clean cover system (as required); and
- A verification report to be produced upon completion of the remedial works to confirm that the work was undertaken in accordance with this remediation strategy, relevant legislation and planning conditions.

4.0 Pre-Construction Remedial Works

4.1 Background

The principal contractor, Morgan Sindall Construction, is to undertake pre-construction enabling works which will include earthworks for the proposed development.

Earthworks will likely be undertaken under a Materials Management Plan (MMP) in accordance with the CL:AIRE Code of Practice (ref. CL:AIRE, 2011. *The Definition of Waste: Development Industry Code of Practice: Version 2*. London: Contaminated Land: Applications in Real Environments (CL:AIRE) to facilitate the reuse of site-won materials. If required the Contractor will produce the MMP, with the sign-off to be completed by an appointed, independent Qualified Person.

This section of the report outlines the remedial works required prior to commencement of the construction phase of the development.

4.2 Demolition and Site Clearance

It is understood that previous Site buildings have been demolished to ground level. No information has been made available by the Client in the form of a Demolition Pack.

The Site should be cleared of all residual debris and vegetation that is required to be removed to facilitate the redevelopment of the Site. All material shall be removed to a suitably licensed landfill, as required.

4.3 Excavation, Breaking and Processing of Sub-Surface Structures

4.3.1 Localised contaminated soils

Owing to the identification of asbestos fibre at TTP2 (TTP2.1 and TTP2.2) location at 0.10m bgl within the Made Ground, it would be prudent for arisings in the area to be visually inspected during excavation of material, to identify any suspect Asbestos Containing Materials (ACMs). Any suspected materials identified should be segregated and managed in accordance with the relevant asbestos management and waste handling procedures.

4.3.2 Existing hardstanding, structures and

All natural or man-made hard materials including concrete slabs, hardstanding, brickwork, foundations, utilities etc. at or below the surface shall be broken out from beneath the development platform/building footprint.

The location and depth of all below ground obstructions remaining during the remedial works / earthworks shall be recorded by the Contractor on the final as-built drawing.

All hard materials and arisings recovered during the works which are intended for re-use shall be processed and stockpiled for asbestos and chemical testing to demonstrate they are suitable for re-use within the proposed redevelopment (if required) or alternatively disposed of off-site to a suitably licensed facility.

4.3.3 Relict Drainage

The condition of existing foul and surface drainage is currently unknown; however, it is assumed that much of the existing drainage was installed when the Site was originally developed as a school, at which point the Site appears to have remained relatively unchanged until demolition of the former school building.

Lucion Delta-Simons is unaware of any condition surveys of the existing drainage and none were available within the archive information reviewed. Given the age of the drainage system, it is plausible that some localised leakages into surrounding soils have occurred.

The Contractor shall be responsible for the blocking off of all drainage at the boundary of the Site and maintaining a watching brief during the excavation of any relic drainage during the enabling works. In the event that unforeseen contamination is encountered, the 'hotspot protocol' as described in Section 4.5 will be implemented.

4.3.4 Health and Safety

Based on the currently available information, the identified asbestos contamination presents an overall low risk ranking to current site users under the existing site use scenario. This assessment reflects the localised nature of the identified asbestos contamination, the low concentration (0.002%) chrysotile detection at TTP2 (0.1m), and the absence of widespread asbestos contamination within surrounding samples.

Notwithstanding the above, the Site comprises an operational school and therefore represents a sensitive land use. Furthermore, the identified asbestos contamination is present within shallow near-surface soils and future intrusive works associated with the proposed development have potential to disturb asbestos-containing materials and soils.

Groundworkers and sub-surface maintenance workers should be made aware of the possibility of encountering contaminated soils through toolbox talks and in particular the presence of asbestos fibres within localised Made Ground and an appropriate protocol to mitigate exposure of the workforce and general public should be in place.

The Contractor will need to prepare a risk assessment which identifies a safe system of work to handle the asbestos containing soils which is likely to include asbestos awareness training, a protocol for unexpected finds (should gross asbestos material be identified) as well as safe working procedures such as damping down of excavations and stockpiles in line with general dust generation mitigation. The risk assessment will need to identify the appropriate levels of Personal Protective Equipment (PPE) and/or Respiratory Protective Equipment (RPE) required. This recommendation should be captured in Site health and safety documentation and in maintenance plans.

Taking into account the low concentration chrysotile detection, the asbestos form identified as chrysotile fibre bundles, the proposed excavation and earthworks activities, the localised proposed works are likely to comprise Non-Licensed Works (NLW) under the Control of Asbestos Regulations 2012 and CAR-SOIL™ guidance.

Upon preliminary review, there is considered to be a low risk of unexploded ordnance (UXO) across the Site. The Principal Contractor will be responsible for implementing appropriate measures to manage and mitigate any risks associated with below ground activities. The detailed UXO risk assessment report is highlighted in Section 2.3.

4.4 Disposal of Water

Whilst previous investigations identified limited groundwater ingress within earthworks excavations, any water encountered during the works shall be chemically assessed and disposed of in accordance with relevant legislation, either off-site or under an appropriate discharge consent issued by the local authority.

Any perched water showing significant contamination should also be appropriately managed and removed from Site, potentially via localised de-watering of the Made Ground and/or superficial deposits.

4.5 Environmental Management

During the remedial works, it will be the responsibility of the Contractor to ensure that the works are managed in an appropriate way as not to further contaminate the ground and/or watercourses and pose a risk to off-site receptors. Particular attention should be made to the potential for nuisance to be caused to the existing school in the surrounding area and mitigation measures provided as appropriate, together with a programme of reassurance monitoring.

The works will involve the disturbance of soils which may contain contaminants including asbestos. The Contractor shall prepare a Construction Environmental Management Plan (CEMP) which shall include measures to prevent the emission of contamination to air and into the wider environment to include (but not limited to):

- Damping down of dry soils/Made Ground materials;
- Odour suppression as necessary during excavation of contaminated materials – damping down and / or misting as appropriate;
- Asbestos in air monitoring during earthworks (including boundary and personal monitoring);
- Use of a wheel wash or road sweeper to address mud on roads;
- Control of water including surface water run-off and water in excavations to prevent escape to adjacent properties and/or watercourses;
- Operation of works only within the times permitted under the planning permission; and
- Details of incident recording procedures.

Refer to the Asbestos Management Plan (AMP) produced by Lucion Services ref. 151028.729345 and full details of the measures to be taken which shall be communicated to staff during the Site induction. The CEMP shall be available for inspection on Site during operating hours.

4.6 Addressing Previously Unidentified 'Hotspots' of General Contamination

4.6.1 Background

As with any 'Brownfield' development, there is a possibility that unknown localised areas of general soil contamination (a 'Hotspot') may be encountered during development works. As such, a 'hotspot' protocol is required during the construction phase of the development. The purpose of the protocol is to provide a ready reference should such an area of contamination be identified by visual or olfactory means during the works.

For any unexpected or unforeseen asbestos contamination refer to the Lucion AMP (ref. 151028.729345).

4.6.2 Protocol

Should an area of contamination be identified by visual or olfactory means during development works, the following procedure shall be followed:

- Immediately stop all works in the area where contamination is suspected;
- Immediately inform the Site Agent who should then contact the Environmental Consultant;
- The Environmental Consultant shall provide a verbal response outlining immediate actions with regard to Site Health and Safety and to limit the potential for contaminants to migrate;
- The Environmental Consultant shall judge each occurrence on merit and should it be deemed necessary the Environmental Consultant shall attend Site to oversee the removal of the 'hotspot' and collect validation samples;
- Any excavated material should be isolated from all other material at the Site, on plastic sheeting and covered with plastic sheeting until the material can be tested for contamination and an appropriate disposal route can be identified;
- Any 'hotspot' stockpiles and excavations should be fenced off, have appropriate signage and their locations recorded on a Site drawing;
- Should any excavated material be required to be disposed of at an off-Site location, the material shall be isolated from all other material at the Site prior to disposal at a suitably licensed facility. All documentation associated with the movement and disposal of any such material shall be supplied to the Environmental Consultant shall, including waste transfer documentation;
- Subject to appropriate Site Health & Safety controls (typically comprising fencing off the excavation) the excavation will remain open until the validation has been completed. Alternatively, for Site Health & Safety reasons, it may be necessary to backfill the excavation with Site derived material. In this case, the location of the excavation will be accurately recorded and the excavation reopened if required, based on the validation results; and
- The Regulatory Authorities shall be informed by the Environmental Consultant shall of any remedial activities required and associated validation testing results. Representatives of these organisations may also wish to visit the Site.

Implementation of appropriate measures to deal with such finds remain the Contractor's responsibility.

A copy of the protocol is also presented in Appendix C to be extracted and used on-Site.

4.7 Materials Management

4.7.1 Materials Management for Earthworks

The redevelopment will include earthworks which will require the excavation and placement of Made Ground / soils which contain contamination, albeit the concentrations within these soils are not considered to preclude them from re-use.

The earthworks will therefore likely need to be undertaken under a Materials Management Plan (MMP) in accordance with the CL:AIRE Code of Practice to facilitate the reuse of these materials. The Contractor shall be responsible for the preparation of a MMP and obtaining appropriate sign off from a Qualified Person prior to the commencement of earthworks.

4.7.2 Asbestos in Soils - Earthworks

The March 2026 Soils Limited Report highlights asbestos was found within one sample taken within the Made Ground at locations TTP2 which consisted of locations TTP2.1 and TTP2.2 at 0.10 m bgl located across the centre of the proposed building footprint. The quantitative analysis carried out indicated Chrysotile fibres, these were recorded to be <0.002% w/w.

The groundworks Contractor should be made aware of the possibility of encountering Asbestos Containing Materials (ACM) within the Made Ground and an appropriate protocol to mitigate exposure of the workforce and general public should be in place with due respect to duties under the Control of Asbestos Regulations 2012 and with reference to the Joint Industry Working Group Asbestos in Soil and Construction & Demolition (C&D) Materials guidance (published by CL:AIRE) titled "Control of Asbestos Regulations 2012: Interpretation for Managing and Working with Asbestos in Soil and Construction & Demolition materials: Industry Guidance" (shortened name CAR-SOILTM).

The document was prepared with the support of the Health and Safety Executive and presents the definitive explanation of how the legal requirements of the CAR 2012 have been interpreted to apply to work with asbestos contaminated soil and construction & demolition materials. The guidance is underpinned by the fundamental requirements expressed in the Regulations, in relation to the protection of employees from risks related to exposure to asbestos but is set within a carefully considered framework designed specifically for soil and C&D materials contaminated with asbestos.

The Contractor will need to prepare a risk assessment which identifies a safe system of work to handle the asbestos containing soils which is likely to include asbestos awareness training, a protocol for unexpected finds (should gross asbestos material be identified) as well as safe working procedures such as damping down of excavations and stockpiles in line with general dust generation mitigation. The Contractor should determine the need for appropriate levels of PPE and/or RPE and any associated air monitoring as required.

The Contractor shall be responsible for providing appropriate documentation for inclusion within the Verification Report including details of any significant asbestos material encountered.

For further detailed information refer to the Asbestos Management Plan (AMP) ref. 151028.729345 by Lucion Services.

4.7.3 Re-use of hard materials

All hard materials and arisings recovered during the works which are intended for re-use as crushed material shall be processed (under the WRAP protocol) and stockpiled for chemical and geotechnical testing to demonstrate they are suitable for re-use within the proposed redevelopment.

5.0 Construction Phase Remediation Works

5.1 Certified Clean Topsoil / Subsoil Layer - Cover System

It is recommended that a clean cover system is placed for all landscaping areas where Made Ground is present at surface, to break the identified contaminant linkage and to facilitate the growing of flora. Where Made Ground has been removed, no remedial measures are deemed necessary aside from the provision of a minimum 300 mm topsoil layer in soft landscaped areas. Identified Topsoil at surfaces within areas of relandscaping must have assessments made for potential re-use.

For areas where a clean cover system is required, the following criteria are recommended:

- A high visibility membrane or hard-dig layer should be installed on top of Made Ground upon which the cover layer will then be placed. This is to provide a physical break of a potential pathway between Made Ground and the cover system.
- Within areas of soft landscaping and grass, a minimum of 300mm of topsoil should be placed over the geotextile marker membrane.
- Where trees are to be planted as part of landscaping, the cover system will be deepened to accommodate the root-ball and tree pit drainage design sought by preliminary landscape hardworks drawing ref. 75CC13-TLP-XX-XX-DR-L-50001.

In accordance with BS 3882:2015, the depth of topsoil shall not exceed 300 mm, but the depth of subsoil should be at least double the depth of the topsoil.

5.2 Imported Materials and Verification

5.2.1 Pre-Importation Testing

In the event that any soils are required to be imported to the Site to be used in cover systems a detailed understanding of the provenance of such materials is to be provided to the Environmental Consultant ahead of any further investigation or import. As a minimum, this should include:

- The materials source location;
- The supplier details and proposed quantities for import; and,
- A description of how the soils have been generated (e.g. stockpiled for removal from a site or manufactured at a recognised supplier).

The sampling frequencies recommended for imported or Site-won materials utilised for the cover layer from various sources is shown in the following table.

Type	Number of Samples	Testing Suite	Acceptance Criteria
Virgin quarried material	1 or 2 depending on the type of stone utilised, to confirm the inert nature of the material	Standard metals suite (As, Cd, Cu, Cr III / Cr VI, Pb, Hg, Ni, Zn)	Verified in accordance with Lucion adopted Human Health Generic Assessment Criteria for Residential Housing end-use which are presented in Appendix D
Crushed hardcore, brick, concrete	Minimum 1 per 250m ³ or a minimum of three samples which is ever is greater	Standard metals suite 16 PAHs TPHCWG Asbestos screen	
Greenfield / manufactured topsoil (off-Site source)	Minimum 3 or 1 per 250m ³ (whichever is greater)	Standard metals suite 16 PAHs	

Type	Number of Samples	Testing Suite	Acceptance Criteria
		Asbestos screen TPHCWG	
Brownfield / Crushed hard materials	Minimum 3 or 1 per 100m ³ (whichever is greater)	Standard metals suite 16 PAHs Asbestos screen TPHCWG	

The chemical criteria against which any imported soils shall be assessed is based on relevant Generic Assessment Criteria applicable at the time of the works for a residential end use (regardless of the intended use as materials should be free from contamination), alternatively, Lucion Human Health Generic Assessment Criteria as presented in Appendix D shall be used.

Any materials which fail the verification testing shall be removed from the Site and replaced with suitable materials by the Contractor.

The verification information shall be included within the verification report.

5.2.2 Post-Placement Verification

Following the placement of the clean cover system in soft landscaped areas, the depth of cover must be physically inspected to confirm the minimum thicknesses detailed in Section 5.1 have been achieved.

The inspection is to be undertaken by the Environmental Consultant and will comprise (at least):

- Inspection pits on a 25 m grid in soft landscaped areas.

It is anticipated that subsoil and topsoil may have been tested for chemical suitability prior to placement. However, as detailed in Section 5.2.1, for any areas where this is not the case, samples will be obtained of topsoil and subsoil on the following testing frequency (as a minimum):

- Topsoil and subsoil shall be sampled from each inspection pit within soft landscaping areas.

These will be tested to confirm compliance with the GAC for a residential end use with plant uptake.

The location of the inspection pits is to be determined by the Environmental Consultant to ensure a good spatial coverage.

The Environmental Consultant will record the overall depth of the clean cover along with the thickness of topsoil and subsoil, and the presence of a membrane or hard-dig layer. A photographic record of the excavation, with suitable scale, will be obtained for the Cover System Validation Report.

Should soils fail the applied criteria, then they shall be replaced by the Contractor with alternatively sourced soils and retested.

The inspection pit and testing frequencies required are summarised in Table 1 below. A copy is also presented in Appendix E; it is recommended that this is distributed to the Contractor for use on-Site during the groundworks.

	Shrub Planting Area Requirements	Soft Landscaping Requirements (required in all soft landscaping areas)
Clean cover thickness where Made Ground is present (must comprise chemically and physically validated subsoil and topsoil)	450 mm minimum cover consisting of: - 300 mm topsoil - 1500 mm subsoil	300 mm minimum cover consisting of: - 300 mm topsoil -
Inspection Pit frequency (to confirm cover thickness and membrane depth, where required)	A minimum of 1 inspection pit per 25 m grid is required in soft landscaped areas	
Testing frequency (coverage to be determined by Environmental Consultant)	Samples required from each inspection pit on a 25 m grid in soft landscaped areas	
If Made Ground is present at surface (Made Ground identified Site-wide)	Membrane required: Where Made Ground is present, a high visibility membrane or hard-dig layer should be installed to break a potential pathway to asbestos containing materials	
If Made Ground is not present at surface (considered unlikely—contact Lucion if no Made Ground is considered present)	No membrane required: Where the Made Ground has been removed in its entirety, the requirement for a clean cover system is negated and a suitable growing medium of at least 300 mm of topsoil should be provided	

5.2.3 Cover systems and other potentially interacting site works

Careful consideration should be given to the programming of in-ground Site works with the potential to disturb the cover system once it has been placed. For example:

- Erection of fencing (where post holes are to be created and arisings generated);
- Planting of trees;
- Services installation.

Ideally, these works (or similar), which would result in made ground being brought to surface, should be programmed to occur *before* installation of the cover system to avoid disturbance/cross-contamination of the cover soils.

In the event such works occur after placement of the cover system, care should be taken to control arisings to avoid such cross-contamination. Evidencing of the absence of cross contamination may be required.

5.2.4 Site Won Materials

Site won materials generated during the enabling works should be accompanied by appropriate audit trails to ensure that the materials are not classifiable as a 'Waste' based on EA's definition of waste. Where materials are produced

under a WRAP protocol, relevant documentation should be made available to the Consultant prior to commencement of crushing activities to demonstrate compliance with the requirements of the relevant guidance.

It is envisaged that surface and buried concrete generated on Site will be segregated and in the absence of visual contamination subsequently crushed to a specification. A suite of chemical testing and frequency is to be agreed between the Contractor and the Environment Consultant to minimise the potential for contaminating large stockpiles of crushed materials. In general terms it is expected that the chemical suite will meet the requirements of Appendix C.

5.2.5 Radon Protective Measures

The Site is located in an area where it sits in the lowest band of radon potential with less than 1% of homes at or above the Action Level. Therefore, it is assumed that radon protective measures are not required.

5.3 Water Pipes and Below Ground Utilities / Structures

5.3.1 Background

Following the 1992 Foundation for Water Research (FWR) report an update Guidance for the Selection of Water Supply Pipes used in Brownfield Land (UKWIR 2010) has been produced.

Careful selection, design and installation of water supply pipes is required on potentially contaminated sites to ensure that pipelines are satisfactorily installed.

To fully comply with the guidance a specific and detailed investigation of each pipe route is considered to be required, at the time of the investigations, no information on the specific pipe routes was available.

5.3.2 Standard Pipe Materials / Upgraded Pipe Material Requirements

It is recommended that the local water undertaker is consulted by the Client prior to ordering and placement of pipes in order to specify their specific requirements.

Details of any upgraded pipework should be provided to the Environmental Consultant for inclusion within the Verification Report.

5.3.3 Clean Service Corridors

Services and utility corridors should be backfilled with clean site-won materials where suitable. In the event that imported materials are required, all material imported to Site for this use should be tested on a ratio of 1 sample per 100 m³ for a range of contaminants appropriate to the source of the material but to include testing for the presence of asbestos as a minimum.

The Contractor shall be responsible for providing all documentation relating to the testing of imported service trench backfill and/or reused site-won materials to the Environmental Consultant for review.

6.0 Verification Reporting & Regulatory Approvals

6.1 General

Following completion of works detailed in Sections 4.0 to 5.0, an Environmental Consultant shall prepare an Environmental Verification Report on the works for submission to the Local Authority to satisfy relevant planning conditions.

6.2 Verification - Enabling Phase

Due to the relatively small scheme, a combined Pre-Construction Phase and Construction Phase Verification Report may be produced, as opposed to individual reports, on completion of enabling works, remediation and earthworks. This report(s) will include as a minimum:

- Summary of works undertaken;
- Details of waste disposal of any material from the Site including waste transfer documentation and details of the receiving treatment/landfill facility;
- Details of any remedial measures undertaken and confirmation of suitability for retention / reuse of any remediated materials;
- Confirmation of the chemical results, and transfer notes detailing the place of origin of any imported fill including any stockpiles left for the subsequent cover system;
- A record of any 'hotspots' found during construction and groundworks, and the associated actions taken to remove them. This will include details of the chemical analysis of samples taken from these areas, verification that the entire hotspot has been removed as necessary, appropriate classification of the waste, waste transfer documentation, and details of the receiving disposal facility;
- Details of the placement of clean cover including the placement of geotextile, topsoil and subsoil through a verification record as described in this strategy;
- Confirmation of the chemical results, and transfer notes detailing the place of origin of any imported topsoil/subsoil; and
- Details of the final water pipe material utilised within the development.

6.3 Regulatory Approvals and Planning Condition Discharge

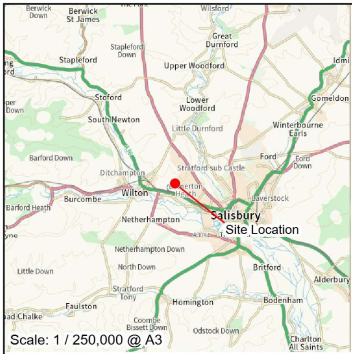
It is intended that this report be submitted to Wiltshire County Council to support the discharge of contaminated land planning conditions (in conjunction with the earlier technical reports).

Drawings

Drawing 1 - Proposed Development Plan

Figures

Figure 1 – Site Location Map



Site Boundary



0 10 20 30 40 50 60 70 m

DO NOT SCALE. NOT FOR CONSTRUCTION



Figure Site Location Plan		
Job Sarum Academy, Salisbury, Wiltshire, SP2 9HS		
Client Morgan Sindall Construction		
Figure No. 1	Revision 1	Date 29 May 2026
Drawn by SG	Checked by RS	Scale 1:750
Job No. 151028.729345		

Appendices

Appendix A – Limitations

Limitations

This Report was prepared by Lucion Delta-Simons Limited ("Lucion") for the sole and exclusive use of the Client and for the specific purpose for which Lucion was instructed. Nothing contained in this Report shall be construed to give any rights or benefits to anyone other than the Client and Lucion, and all duties and responsibilities undertaken are for the sole and exclusive benefit of the Client and not for the benefit of any other party. Lucion does not intend, without its written consent through a formal letter of reliance or warranty, for this Report to be disseminated to any party other than the named Client or to be used or relied upon by any party other than the named Client. Use of the Report by any other party is unauthorised and such use is at the sole risk of the user. Any party using or relying upon this Report, other than the Client, agrees by virtue of its use to indemnify and hold harmless Lucion from and against all claims, losses and damages (of whatsoever nature and howsoever or whensoever arising), arising out of or resulting from the performance of the work by Lucion. Unless explicitly agreed otherwise, in writing, this Report has been prepared under Lucions' Standard Terms and Conditions as included within our proposal to the Client.

The recommendations contained within this Report represent Lucion professional opinions, based upon the information detailed within the Report, exercising the reasonable skill and care to be expected of a professional consultant holding itself out as having the competence, experience and resources necessary for the purpose of carrying out similar work in scope and character to the services performed. The Report needs to be considered in the light of the proposal and associated limitations of scope. The Report needs to be read and considered in full and isolated sections cannot be used without full reference to other elements of the report and any previous works referenced within the Report.

Where Lucion has obtained, reviewed and evaluated information in preparing this Report from the Client and others and Lucion conclusions, opinions and recommendations has been reasonably determined using this information, Lucion does not warrant the accuracy of the third-party information provided to it and cannot be responsible for any opinions which Lucion has expressed, or conclusions which it has reached in reliance upon information which is subsequently proven to be inaccurate.

Site surveys document the conditions encountered at the time of survey only and conditions may change due to natural processes or human intervention. As such, surveys represent an assessment at a specific point in time and Lucion cannot be responsible for adverse conditions which arise or become apparent after the time of the survey or for conditions which sit outside the scope for which the survey or Report was commissioned.

Where intrusive investigations have been completed, information, comments and opinions given in this report are based on the ground conditions encountered during the site work period and on the results of laboratory and field tests performed during the investigation. Ground conditions are inherently variable such that no investigation can be exhaustive to the extent that all adverse conditions are revealed. Conditions may therefore be present beneath the site that were not apparent in the data reviewed or obtained as part of this assessment. It should be noted that groundwater levels vary due to seasonal and other effects and may at times differ to those measured during the investigation. Lucion does not warrant or guarantee that the Site is free of hazardous or potentially hazardous materials or conditions. Where risk assessment is undertaken, this is based upon the standards, guidance and common practice at the time of the assessment and Lucion cannot be responsible for conditions which become apparent following changes in guidance or practice or advancements in scientific knowledge which change the position in relation to assessment of risk.

No aspect of this Report constitutes a design. Where this information is used in design, the designer should verify the information has been used appropriately.

Where budgets are prepared and presented within the Report, these are for information only to indicate the likely magnitude of a cost and do not represent an invitation to treat for the works. All budgets and programmes presented should be reviewed and verified by appropriately qualified and experienced independent Project Managers and Cost Consultants.

Appendix B - 'Hotspot' Protocol

Protocol for Addressing Previously Unidentified 'Hotspots' of Contamination

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

- Immediately stop all works in the area where contamination is suspected;
- Immediately inform the Site Agent who should then contact the Environmental Consultant;
- The Environmental Consultant will provide a verbal response outlining immediate actions with regard to Site Health and Safety and to limit the potential for contaminants to migrate;
- The Environmental Consultant will judge each occurrence on merit and should it be deemed necessary. The Environmental Consultant will attend Site to oversee the removal of the 'hotspot' and collect validation samples;
- Any excavated material should be isolated from all other material at the Site, on plastic sheeting and covered with plastic sheeting until the material can be tested for contamination and an appropriate disposal route can be identified;
- Any 'hotspot' stockpiles and excavations should be fenced off, have appropriate signage and their locations recorded on a Site drawing;
- Should any excavated material be required to be disposed of at an off-Site location, the material will be isolated from all other material at the Site prior to disposal at a suitably licensed facility. All documentation associated with the movement and disposal of any such material will be supplied to The Environmental Consultant, including waste transfer documentation;
- Subject to appropriate Site Health & Safety controls (typically comprising fencing off the excavation) the excavation will remain open until the validation has been completed. Alternatively, for Site Health & Safety reasons, it may be necessary to backfill the excavation with Site derived material. In this case, the location of the excavation will be accurately recorded and the excavation reopened if required, based on the validation results; and
- The Regulatory Authorities shall be informed by the Environmental Consultant of any remedial activities required and associated validation testing results. Representatives of these organisations may also wish to visit the Site.

Appendix C – Imported Soils Assessment Criteria

The following Generic Assessment Criteria shall apply as absolute limits for all soils imported for re-use as clean cover **regardless of the end use of the Site**.

The criteria selected are based on Residential with Plant Uptake land use scenario on the basis that imported clean cover soils should be 'clean' and not result in an increase in contaminant loading. It may be possible, in some circumstances, to agree alternative, higher criteria with the appropriate regulatory body, however, this is outside of the scope of this assessment.

Soils shall be tested for a suite of contaminants appropriate to the source land use but as a minimum for the contaminants stated below unless otherwise stated within this strategy. The below criteria assume a minimum of 1% Soil Organic Matter.

In addition to meeting the criteria below, imported materials shall be free from deleterious inclusions and shall be free from invasive weeds (Japanese Knotweed).

Any testing for asbestos must be from a UKAS accredited laboratory and the only acceptable criteria is 'Not Detected'. Any detected asbestos, even is reports as <0.001% is not acceptable. Asbestos containing soils must not be used for clean cover materials.

Criteria for Imported Materials			
Compound	GAC	Source	Comment
Arsenic	37	C4SL	
Cadmium	11	LQM	
Chromium (III)	910	LQM	
Chromium (VI)	6	LQM	
Copper	2400	LQM	
Lead	200	C4SL	
Mercury (inorganic)	40	LQM	
Nickel	130	LQM	
Selenium	250	LQM	
Zinc	3700	LQM	
Acenaphthene	210	LQM	
Acenaphthylene	170	LQM	
Anthracene	2400	LQM	
Benzo[a]anthracene	7.2	LQM	
Benzo[a]pyrene	2.2	LQM	
Benzo[b]fluoranthene	2.6	LQM	
Benzo[ghi]perylene	320	LQM	
Benzo[k]fluoranthene	77	LQM	
Chrysene	15	LQM	
Dibenz[ah]anthracene	0.24	LQM	
Fluoranthene	280	LQM	
Fluorene	170	LQM	
Indeno[123-cd]pyrene	27	LQM	
Naphthalene	2.3	LQM	

Criteria for Imported Materials			
Compound	GAC	Source	Comment
Phenanthrene	95	LQM	
Pyrene	620	LQM	
Benzene	0.2	C4SL	
Toluene	130	LQM	
Ethylbenzene	47	LQM	
Xylene - m/p	56	LQM	
Xylene - o	60	LQM	
Total Petroleum Hydrocarbons (TPH)	500		Professional judgement.
Aliphatic EC5-EC6	42	LQM	
Aliphatic >EC6-EC8	100	LQM	
Aliphatic >EC8-EC10	27	LQM	
Aliphatic >EC10-EC12	130	LQM	
Aliphatic >EC12-EC16	500	LQM	Capped at 500 - professional judgement
Aromatic >EC5-EC7	70	LQM	
Aromatic >EC7-EC8	130	LQM	
Aromatic >EC8-EC10	34	LQM	
Aromatic >EC10-EC12	74	LQM	
Aromatic >EC12-EC16	140	LQM	
Aromatic >EC16-EC21	260	LQM	
Aromatic >EC21-EC35	500	LQM	Capped at 500 - professional judgement
Asbestos	Not Detected		

The respective sources are:

- Soil Guidance Values (**SGV**) published by the EA;
- Category 4 Screening Levels (**C4SLs**) published by DEFRA;
- The 2014 Land Quality Management (**LQM**) / Chartered Institute of Environmental Health (CIEH) Suitable for Use Levels for Human Health Risk Assessment (S4ULs);
- The guidance values produced by the Environmental Industries Commission (**EIC**), the Association of Geotechnical and Geoenvironmental Specialists (AGS) and Contaminated Land: Application in Real Environments (CL:AIRE) in December 2009; and
- In house Generic Screening Values (**DS-GACs**) derived by Lucion.

Appendix D – Inspection Pit and Testing Frequencies

	Raised Bed Requirements (required in areas identified for food growing / orchards / allotments)	Soft Landscaping Requirements (required in all soft landscaping areas)
Clean cover thickness where Made Ground is present (must comprise chemically and physically validated subsoil and topsoil)	600 mm minimum cover consisting of: - 200 mm topsoil - 400 mm subsoil	450 mm minimum cover consisting of: - 150 mm topsoil - 300 mm subsoil
Inspection Pit frequency (to confirm cover thickness and membrane depth, where required)	A minimum of 1 inspection pit per 25 m grid is required in soft landscaped areas	
Testing frequency (coverage to be determined by Environmental Consultant)	Samples required from each inspection pit on a 25 m grid in soft landscaped areas	
If Made Ground is present at surface (Made Ground identified Site-wide)	Membrane required: Where Made Ground is present, a high visibility membrane or hard-dig layer should be installed to break a potential pathway to asbestos containing materials	
If Made Ground is not present at surface (considered unlikely—contact Lucion if no Made Ground is considered present)	No membrane required: Where the Made Ground has been removed in its entirety, the requirement for a clean cover system is negated and a suitable growing medium of at least 300 mm of topsoil should be provided	