
Importation Protocol and Construction Methodology

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Report for:
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1. INTRODUCTION AND SCOPE

- 1.1 This report has been prepared by AA Environmental Limited (AAe) for the import of engineering fill at Junction 10, M5 Improvement Scheme, by Galliford Try Infrastructure Limited (hereafter referred to as the Operator). In total 602,802 m³ of imported engineered fill is required to construct the road embankments. Engineering fill includes the bulk placement for land raise.
- 1.2 This Importation Protocol relates to the bulk engineering fill import as part of the Deposit for Recovery activity only. The crushing and screening waste procedures are outlined in the Operational Plan.
- 1.3 This plan sets out the working controls to be implemented at the site. The Plan has been developed in conjunction with the Designer's Contract documents Appendix 6/14 and 6/15.

2. IMPORTATION CONTROLS

- 2.1 The importation protocol details the processes through which the material brought to the site will be controlled. This process will ensure that the environmental and physical properties of the material are deemed suitable and in compliance with the project requirements.
- 2.2 Importation will only progress once an area of the site has been prepared in line with section 3 of this plan.

Material Acceptance Control

- 2.3 It is proposed that fill materials will be imported to the site for the approved land raise works. The material will be obtained from a variety of local sources. The material will be required to meet the grading requirements for General Fill engineering Classes as set out in Series 600 of the Specification for Highway Works (Table 6/1 and 6/2) and criteria set out in this document.
- 2.4 To determine a material's acceptability for use at the site, the Operator will apply this protocol ensuring the properties are fully assessed, and that importers of the material are suitably licensed.

Waste Carriers Licence

- 2.5 A Waste Carriers Licence will need to be provided to the Operator prior to importation of any material by a third party. The certificate will be checked to ensure that it is valid. If there is any doubt as to the certificate's validity, the Operator will restrict access to the site whilst clarification is provided regarding validity and status.

Prior Assessment of Material Characteristics

- 2.6 Due to the volume of material required it is not possible to source from one site. It is proposed to import material predominantly from demolition and construction sites in surrounding Gloucestershire area. Where contamination may have occurred, material will only be accepted following receipt of the necessary contamination reports, sampling methodologies and analysis. All wastes will undergo classification in accordance with WM3 prior to its acceptance at the site or the Operator will carry out suitable checks to ensure producers have classified their waste correctly.
- 2.7 Prior to the importation of any material, the Operator will evaluate the source of the material to be accepted under this protocol. The Operator will employ a Waste Information Form (WIF) to document the evaluation process for each material stream to be deposited at the site, for example, the tracking process. An example is shown in Appendix C. The WIF will identify the material type and its source. If the material is not composed of natural soil, stone or rock, the WIF will determine its environmental characteristics. As appropriate, this will include chemical solid test results on metals, hydrocarbons

and non-metals, as well as the leachate assessment detailed in Appendix B. The WIF, along with any supporting information, will be retained at the Operator's office. Each WIF will have a unique reference. A schematic of the material acceptance procedure is attached in the Appendix A. Details required prior to acceptance include the following:

- Source details (location, origin, volume, previous land uses); and
- Material characteristics (chemical test results where available, texture and colour, process producing the waste).

2.8 The material types to be accepted at the site are presented in the Permit. The use of the materials must comply with the conditions in the Permit table.

Natural and Construction Inert Materials

2.9 Where a material can be proven as fully complying with the Landfill Directive definition of inert, including brick, clay, concrete, tiles and ceramics, they can be imported to the site without chemical testing. The material stream must be inspected prior to import, to determine there is no potential cross contamination. Suitable material streams that can be imported without chemical analysis are presented in Table 1.

Table 1. Inert Materials Acceptable at the Site as Fill Material	
Description	European Waste Catalogue (EWC) Code
Concrete	17 01 01
Bricks	17 01 02
Tiles and ceramics	17 01 03
Mixtures of the concrete, bricks, tiles and ceramics	17 01 07
Soil and stones (natural arisings confirmed by inspection, not including peat and top soil and not from contaminated sites)	17 05 04 20 02 02

2.10 Details of the inspection will be recorded in the WIF for each material stream. The management of the import is detailed in Section 2.16.

Potentially Suitable Materials

2.11 Soils from brownfield land or industrial processes (shown below in Table 2) will not be accepted at the site unless they can be definitively proven to be suitable and accordance with the standards set out in Appendix B. The following checks and tests will be undertaken prior to the material being imported:

- The Operator will visually inspect the waste, to ensure that there is no unacceptable detritus within the matrix of the material or suspicious odours. In the event that there is any doubt the material will not be determined as acceptable;
- The Producer or Operator will undertake sufficient sampling and chemical analysis at an accredited laboratory to determine suitability. Testing must follow good industry practice and the minimum frequency must comply with the Table 4.1 of the EA Guidance¹ and as presented below²;
- Where there is compliant material below potentially contaminated material there must be a clear policy of segregation demonstrated (in line with quarantine procedures); and
- In the event that detritus is presented but considered to be acceptable, definitive quantification must be undertaken and the amount of waste proven to be less than 1 % weight by weight³.

¹ Environment Agency 'Waste Sampling and Testing for Disposal to Landfill'

² In the event the producer provides insufficient data, but it is compliant, the Operator will undertake the residual testing during initial importation.

³ An acceptable standard for use in capping below highways. Series 800 of the Highways Specification

Description	European Waste Catalogue (EWC) Code
Soil and stones from Brownfield land	17 05 04 or 20 02 02
Wastes from mineral non-metalliferous excavation	01 01 02
Waste gravel and crushed rocks	01 04 08
Waste sand and clays	01 04 09
Solid from soil remediation (limited to soil washing fines only)	19 13 02

- 2.12 The sample analysis provided must show the material complies with both human health and controlled water criteria. The testing frequency completed must include all parameters anticipated from a desktop review of the material and must fully characterise the waste in line with Level 1 and 2 EA Guidance 'Waste Sampling and Testing for Disposal to Landfill'. It should be noted that no soils with the potential for PCB, VOC (other than BTEX) will be accepted at the site. The required testing frequency by the Producer is presented in the extract from the EA guidance, 'Table 4.1'.

	Population (tonnes)	Homogeneous (number of samples)	Heterogeneous and new wastes (number of samples)
Level 1 Characterisation for Descriptive, Total Concentration & Leaching Tests	<100 t	2	5
	< 500 t	3	8
	<1000 t	5	14
	10,000 t	11	22
	plus per additional 10,000 t	+5 (pro rata)	+10 (pro rata)

- 2.13 The representative analysis will be assessed against the requirements of Appendix B. The soils will be deemed acceptable if both the visual inspection and the chemical assessment are passed. A WIF will be completed documenting the acceptable nature of the material.

Prohibited Material

- 2.14 The following wastes are not permitted at the site:

- Hazardous wastes;
- Wastes in liquid form;
- Asbestos fragment containing material; and
- Wastes consisting solely or mainly of powder.

Site Controls of Imported Material

- 2.15 Once waste/material has been accepted for importation, it will be subjected to further checks on the site, including:

- The WIF form will be issued to site;
 - Every load will be inspected at the gatehouse to ensure the material arriving is acceptable. The operator will inspect the imported materials at the point of placement. Records of the time/date and materials being inspected will be maintained in a site diary (and digitally available for inspection);
 - Additional visual inspections will be made on an ad-hoc basis during placement and formation;
 - Validation testing of imported potentially acceptable materials (as defined in Table 2) will be screened against the standards in Appendix B. Note, 6/15 testing will be undertaken to determine risk to surface water; and
 - Any non-conforming material will be segregated and placed in quarantine.
- 2.16 If there are any concerns regarding the material (including odour, visual discolouration or sheen, potential presence of asbestos) the importation will cease immediately and only recommence once any discrepancies have been fully resolved. The material will be transferred to the quarantine area as detailed in the Operational Plan. Any materials which are suspected to be contaminated or appear to contain unacceptable materials (e.g. asbestos fragments or deleterious matter including plastics) will be placed in the quarantine area. If a material cannot be readily moved, the affected area will be fenced off to avoid disturbance. The Producer (person or organisation) of the material will be contacted with a view to removal and off-site disposal, with further soil testing undertaken as necessary.
- 2.17 The documentation (completed WIF and Certificates of Analysis, as required) will be retained by the Operator for all materials imported onto the site, for at least 2 years. The Operator will record all sources of materials imported onto the site and calculate the total imported volume on a weekly basis. All records will be made available to the Environment Agency for inspection, as required.
- 2.18 Placement of fill below the saturated ground will be naturally occurring, uncontaminated materials only. No Made Ground will be placed 0.5 m depth below the flood zone 3 (plus climate change) flood level; nor within 10 m of the River Chelt.

3. EARTHWORK SPECIFICATION AND CONSTRUCTION CONTROLS

Overview

- 3.1 This section details the following specification and construction requirements that will be adhered to:
- the management of the existing infrastructure and ground condition prior to import;
 - the management of the importation process;
 - the performance specification for the platform on completion; and
 - verification process for the materials.
- 3.2 The basis for the Specification is the current Manual of Contract Document for Highway Works (MCDHW), Volume 1: Specification for Highway Works (SHW) and BS 6031:2009 Code of practice for earthworks (BS 6031). Reference shall also be made to the guidance published in the Design Manual for Roads and Bridges (DMRB), and HA 70/94, Construction of Highway Earthworks.
- 3.3 For all earthworks construction, reference should be made to the relevant requirements given in the current edition of the Specification for Highway Works, including (but not limited to) the following:
- Reference should be made to the cut/fill earthworks drawings together with the relevant drawings of the proposed development.
 - all geotechnical testing shall be compliant with the current edition of BS1377 (Parts 1 to 9) and undertaken by a UKAS accredited laboratory.

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- 3.4 Construction plant and other vehicular traffic (except for that required for preparation of the formation in compliance with Clause 616 of the SHW) shall not be operated on the formation unless adequate protection, if necessary in addition to any weather protection, is provided.
 - 3.5 All earthworks shall be constructed by depositing materials as soon as practicable after excavation/delivery to site. If material is stockpiled, it must be placed and compacted and the sides sealed to prevent water ingress and 'softening'.
 - 3.6 The final specification of the platform is that it attains a 5% Californian Bearing Ration (CBR). The performance specification has been selected to enable a stable platform to be constructed ensuring that followon contractors can safely operate over the former landfill areas.

Site preparation for importation

- 3.7 Prior to any import, a full plot will be prepared to receive the imported material. Any ecological constraints will be identified and advised by the project ecologist, not limited to nesting birds. Vegetation will be removed and stockpiled. The material will be transferred off site for recovery in line with the waste regulatory regime or re-used on site for landscaping purposes.
- 3.8 Once an area has been prepared, any soils will be stripped back and stockpiled for re-use (if required) or transferred off site for recovery elsewhere in line with the waste regulatory regime. There will be no mixing of topsoil with subsoils, underlying strata or Made Ground. Soil stockpile management will be undertaken in accordance with the DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites⁴.
- 3.9 Once a plot has been stripped of vegetation and soils, it will be considered prepared for formation works and importation. Prior to any importation of waste under the permit the plot surface will be surveyed to a minimum of 0.05 m accuracy to OS Datum (GPS).

Importation and placement of fill

- 3.10 Material will only be imported from approved sources in line with this protocol. The following engineering material types will be imported: Class 1 Granular General Material, Class 2 Cohesive Fill Materials and Class 6 Capping.
- 3.11 Only natural subsoils can be used within 10 m of the River Chelt and/or within the Flood Zone 3 (plus appropriate climate change allowance). This is a further conservatism within the site design. Materials outside of these areas only need to comply with Appendix B.
- 3.12 All imported waste/material is subject to the checks and inspection set out in Section 2. Specific testing requirements will be set out in the Contractor's earthworks method statement. Whilst the placed fill material will not be subject to intensive loading, it must be suitably compacted to enable the passage of operational plant and future land users.
- 3.13 The fill areas will be formed either from Class 1 (Granular) or Class 2 (Cohesive) Engineering Fill, as specified in series 600.
- 3.14 In each working area, the acceptable fill will be placed and compacted in accordance with the principle design prepared by the Client's geotechnical consultant. The number of rolls will be determined by the groundwork contractors plant size and material type. The earthworks method statement will set out the required number of passes based upon a trial platform.

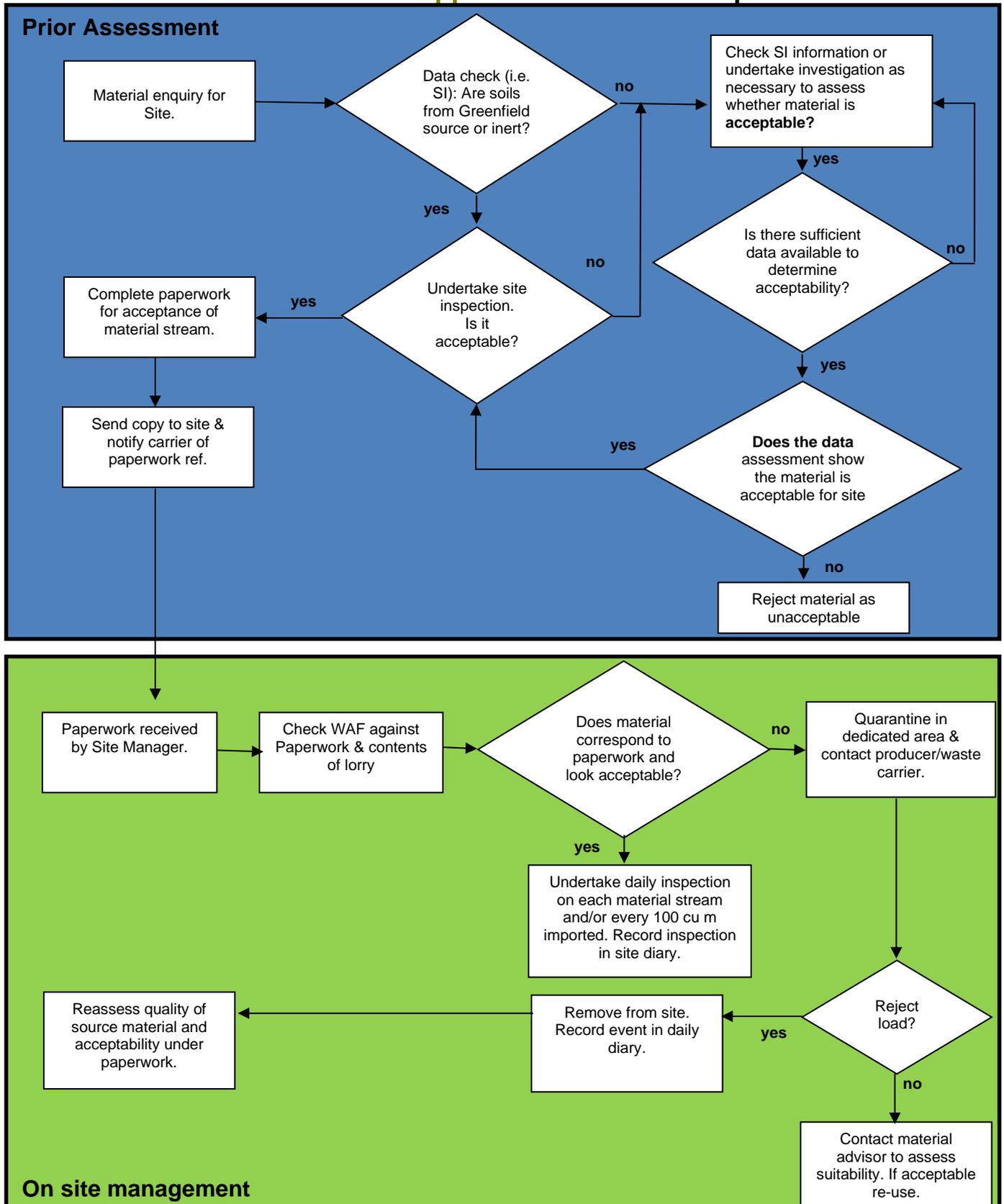
⁴ [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

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- 3.15 The lifts will be repeated until the formation height has been achieved.
- 3.16 Any unacceptable material identified, when assessed against the geotechnical or environmental specification, will be segregated in the quarantine area and transferred to a suitably permitted facility. The material will be disposed of in accordance with the waste regulatory regime and hierarchy.

Testing, Inspection and Validation

- 3.17 The Operator will appoint a Project Engineer who will supervise the works. The supervising engineer will undertake weekly inspections of the works and undertake the required testing.
- 3.18 The engineer will inspect the nature of the material being imported, the sources and their performance when placed.
- 3.19 On completion of each plot, a validation report will be issued as part of the surrender report. This report will include the following:
- i. Weekly record sheets, including a summary activities;
 - ii. Photographs showing progress of the works'
 - iii. A general description of the works completed, including any earthworks, placement and compaction methodology and plant used;
 - iv. Formation treatment, including drainage and treatment of soft areas, as applicable;
 - v. Plant, personnel and visitors present;
 - vi. Records that demonstrate relevant Health and Safety and Environmental controls are in place, with any relevant monitoring data;
 - vii. Waste transfer notes for materials disposed offsite;
 - viii. Material records and source information for imported materials;
 - ix. Application of acceptability criteria and summary of control test results for each specific earthworks material placed during the earthworks operations and including the items in SHW Table 6/6;
 - x. The field engineers weekly reports including chemical and geotechnical test certificates and monitoring data including location and level with associated drawings;
 - xi. Coordinates, levels, invert levels and diameters of services remaining on site;
 - xii. Drawings showing the location and level of each specific earthworks material placed during the earthworks operations, any feature or operation relevant to the earthworks including any instrumentation and the location of trial areas and control tests; and
 - xiii. All correspondence with Statutory and Regulatory Authorities

Appendix A: Waste Acceptance Procedure



Appendix B
Derived Assessment Criteria

Appendix C
Example of a Waste Acceptance Form