Engineering Construction Proposal

Deposit for Recovery of Burnt Red Shale within Enabling Works

Document Reference:	70014/PFR/001
Project:	QTS Project Wind (Cambois Data Centre Campus)
Client/Employer:	Renaissance Land
Contract Administrator :	Arcadis
Contract Engineer:	Cundall
Principle Contractor:	Rainton Construction Ltd (Part of the MGL Group)
Earthworks Sub Contractor:	MGL Demolition Ltd (Part of the MGL Group)
Contract Package:	Phase A Enabling Works
Document Ref:	TBC
Revision:	B
Date:	22nd December 2025

Document Control

Role	Organisation	Name	Signature	Date
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Checked by	Rainton Construction			
Reviewed by	Cundall			
Approved by	QTS			

Distribution: QTS, Cundall, Arcadis, Rainton Construction, Dunelm Geotechnical, Site Team.

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1. Executive Summary

This document seeks to aid the approval to recover and reuse Burnt Red Shale (BRS) on the QTS Project Wind site under an Environmental Permit – Deposit for Recovery by outlining the engineering proposals for the re-use of BRS onsite.

The BRS will be processed (by natural aeration only (i.e.no screening or modification)) and placed as a compacted and validated general fill beneath a topping of engineered granular fill (6F2 capping) in external

hardstanding and platforms, in compliance with the Earthworks Specification, the Remediation & Earthworks Strategy, and the Permit conditions. The approach delivers carbon, cost, and programme benefits by avoiding off-site disposal and reducing import reliance, while meeting geotechnical performance and environmental protection standards.

Key data:

Material:	Burnt Red Shale (burnt colliery shale) from on-site stockpile or excavation works.
Indicative volume:	9,617 m^3 confirmed from latest survey undertaken 05/11/25 plus anticipated 7,000m^3 remaining excavation = ~17,000m^3 total
Intended classes/uses:	General fill (Class 1A/B or 2C)
Placement zones:	(Indicative) Phase 1 Zone B (averaging 600mm depth beneath aggregate layer).
Testing & QA/QC:	Full laboratory classification, sulfate suite, OMC/MDD, in-situ density, plate load/LWD per specification.
Controls:	Dust, water, runoff, temporary stockpiles, stability, and verification.

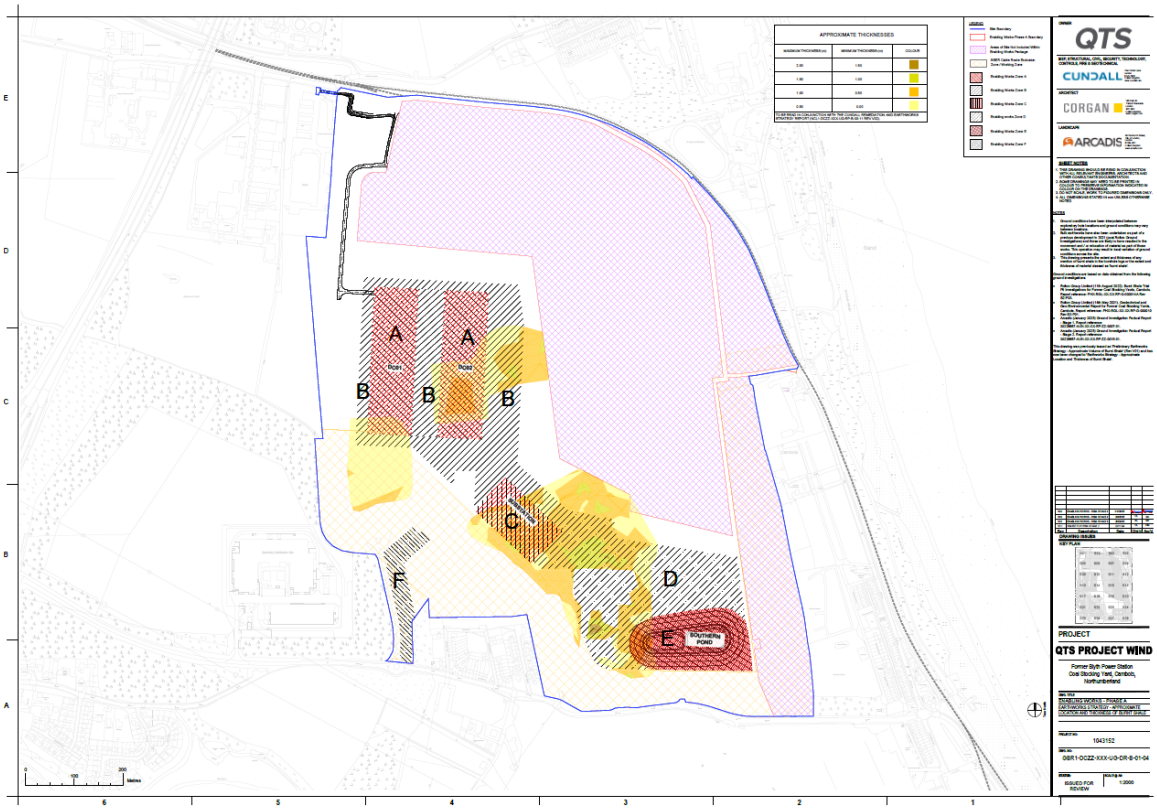

Figure 1 - Anticipated locations of BRS excavations

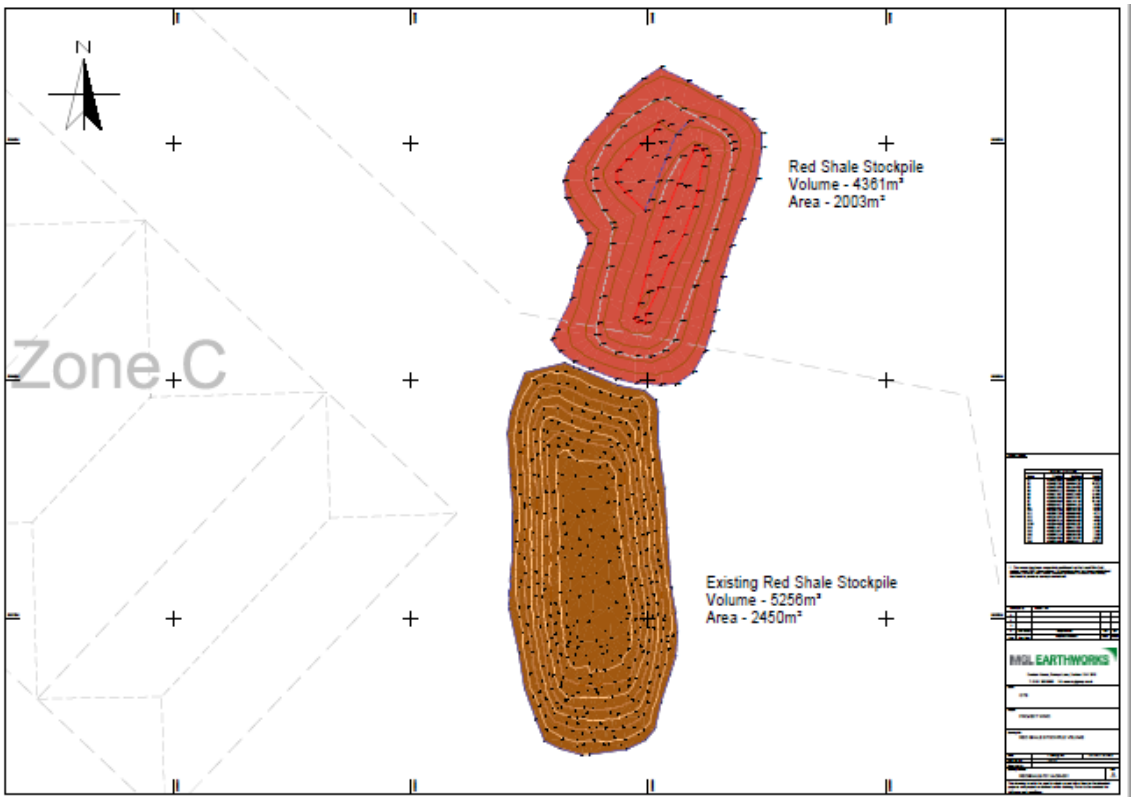

Figure 2 - Survey of 2 nr BRS stockpiles 05/11/25

Figure 3 - Drone Photograph of stockpiled BRS 05/11/25

*All quantities and designations to be validated prior to works and confirmed in completion validation document.

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2. Background & Objectives

The Phase A enabling works (carried out under planning application 25/01725/REM) include bulk earthworks, formation preparation, sub-formation/capping, obstruction identification / removal, piling platform construction to DC01, DC02 and substation, external yards, drainage corridors, and access roads.

The site contains numerous material streams which are to be classified and, where suitable, incorporated within the works, including concrete, aggregates (subgrade and stockpiled), PFA, tarmac planings, organic surface materials, granular general fills, cohesive general fills and historical colliery-derived materials i.e. Burnt Red Shale. This BRS is proposed for recovery and beneficial reuse to meet engineering and sustainability targets, and this document aims to outline the logistics and methods to be used to ensure the BRS is incorporated in a demonstrably compliant manner.

Key Objectives: (i) achieve compliant engineered platforms; (ii) minimise export/import; (iii) meet permit conditions; (iv) provide full traceability and verification for planning discharge.

Related documents:

Earthworks Specification – Enabling Works:	GBR-ENA1-XXX-UG-SP-B-00-01 V02 (Appendix 8)
Remediation & Earthworks Strategy:	GBR1-ENA1-XXX-UG-RP-B-00-11 V02 (Appendix 9)
Latest Burnt Red Shale stockpile survey:	REDSHALE-70114-DR-001 (Appendix 2)
Waste Recovery Plan:	GBR1-DCZZ-CDL-STE-XX-RP-B-0-0016_Waste Recovery Plan P03 (appendix 11)
ESSD:	GBR1-DCZZ-CDL-STE-XX-RP-B-0018_ESSD (appendix 12)
Email correspondence:	Deposit for Recovery permit intent and EA dialogue

A full list of appendices is provided in Section 17.

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3. Regulatory & Permitting Basis

Regime: Environmental Permitting (England & Wales) Regulations – Deposit for Recovery permit for on-site reuse of waste-derived material (BRS).

Waste status: BRS will be recovered via engineering and processing (if required – limited to natural aeration only) into the works such that it demonstrably replaces non-waste materials without unacceptable environmental impact as demonstrated by Cundall documents enclosed within this application. Preliminary Waste Classification of BRS materials has been previously undertaken. The majority of BRS materials were classified as Non-Hazardous or Inert. One instance of BRS recording a potentially Hazardous classification coincides with the location of a known hydrocarbon hotspot and as such, a Hazardous classification (under WM3) will not apply to all BRS materials. The relevant waste code for the proposed waste to be recovered as part of the permit will be 17 05 04 (soils and stones not containing hazardous substances).

Interface with other routes: If any material stream is unsuitable under the permit (e.g. fails acceptance criteria and cannot be aerated onsite for re-use under the details of the Earthworks Specification), then it will be diverted to alternative lawful routes (e.g., off-site disposal or off-site treatment). The majority of BRS is anticipated to be suitable, with the localised hotspot of potentially hazardous BRS within an area C requiring further investigation and review once exposed.

Permit deliverables (this proposal contributes to): recovery purpose and benefit statement, material description and acceptance criteria, processing methods (if required), location and design of works, emissions and mitigation (dust, noise, water), monitoring and records, technically competent management, and tracking and verification details.

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4. Scope of Works

Included: Recovery of BRS from existing stockpile(s), from excavation works, compliance testing, summary moisture conditioning (if required but not expected – limited to natural aeration only), placement and compaction in defined zones, QA/QC throughout the re-use, environmental controls, record-keeping, and verification reporting.

Excluded: Foundation/concrete design, permanent drainage/treatment, works outside Phase A boundary, works in Area D, and further soft-landscaping remediation measures unrelated to BRS reuse. The future permanent design of concrete/drainage/utilities, and their interface with the BRS lies out with the intent of this document.

Interfaces: Earthworks contractor, piling/ground improvement, drainage and utilities, temporary works (haul roads/working platforms), and ecologist/arboriculturist for sensitive areas.

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5. Roles & Responsibilities

Employer (QTS): Appoints enabling contractor and independent verifier, holds client responsibilities under CDM.

Engineer (Cundall): Technical oversight, specification compliance, acceptance of trials and QA evidence.

Principal Contractor / Enabling Contractor (Rainton Construction / MGL Demolition): Method statements, RAMS, processing, testing, placement, QA records, environmental controls, undertaking the placement and engineering works and as-built deliverables.

Independent Geotechnical/Environmental Verifier (Dunelm Geotechnical): Oversight and audit of testing, inspections, compliance reporting, and Verification Report.

Laboratories: UKAS/MCERTS testing, reporting in AGS and PDF – principally but not exclusively G2M Testing Ltd

Regulators: Environment Agency and Northumberland County Council (Local Authority) – permit and planning conditions.

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6. Material Description & Source

Material: Burnt Red Shale derived from historical colliery spoil. Based on previous ground investigations the BRS material is described as red / orange in colour and primarily encountered as sandy gravel with frequent cobbles of burnt shale or where gravel is of burnt shale featuring other constituents (such as mudstone, concrete and sandstone). BRS is occasionally locally interbedded with general made ground and has likely been present on site for some time and is significantly weathered. The classification of this material for the proposed works will be any strata where Burnt Shale is considered to comprise >50% on a visual basis.

Source: Existing on-site stockpile within the Phase A area, and temporary onsite stockpiles following from initial excavation works. See appendix 2 detailing location at time of writing.

Available quantity:

- Existing stockpile: 5,256 m^3 bulked volume in stockpile as surveyed on 05/11/25.
- Temporary stockpile (cut from C): 4,361m^3 bulked volume in stockpile as surveyed on 05/11/25.
- Expected remaining BRS: 7,000m^3 anticipated based on previous ground investigations
- Total BRS: 17,000m^3 (this may vary as Phase 1 excavation works progress)

Expected geotechnical classification for placement Class 1A/1B Granular Fill or Class 2C Cohesive Material for engineered general fill (platforms/embankment).

Moisture & frost: BRS to be placed in non-frost susceptible applications or be proven to have evidence of non-susceptibility; moisture conditioning will target OMC as outlined within the Earthworks Specification (allowable range: OMC-2% < NMC > OMC+2%).

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7. Acceptance Criteria

7.1 Geotechnical

Classification: MC, grading, Atterberg (if fines present), OMC/MDD (appropriate compaction method), and soaked CBR where required by design. Classification testing is to be undertaken in line with the Earthworks Inspection Test Plan (Appendix 7) and Earthworks Specification (Appendix 8). Classification results are to be reviewed against acceptance criteria outlined in the earthworks specification prior to incorporation within the works by both the earthworks contractor (MGL Demolition) and the independent overseeing consultant (Dunelm Geotechnical), prior to being submitted to the Cundall for oversight review.

If the classification results return non-compliant results, then a technical proposal will be drafted by MGL to outline the methods that will be used to generate a compliant material. This will be limited to (i) material aeration and (ii) picking of oversize. Screening and additional of powdered additives is not to be undertaken under this permit.

Compaction: A compaction trial pad will be constructed and tested in line with Technical Submission 4 (Appendix 4) prior to incorporation within the works. Once the trial pad results have been received and reviewed a compaction report will be drafted outlining the technical parameters and targets for the placement operation (see example of this report in Appendix 10) Once mutually agreeable, the BRS will be placed in the intended end use location and tested in line with the Earthworks Specification.

Layering: Single-source material per layer, max compacted layer thickness to suit plant/trials. No multi-layering of BRS will take place, i.e. BRS will be placed in blocks of general fill and not be interspersed, blended or mixed with other materials before or during the placement operation.

7.2 Chemical / Durability

The BRS will be chemically tested to the suite of contaminants outlined in Table 5-1 in the Remediation Strategy, and sulphate testing as outlined in the Earthworks Specification with key results being the sulphate suite: pH, water-soluble sulphate, oxidisable sulphide, total potential sulphate.

Limits: Compatible with concrete class and structural backfills. It is understood that BRS and expected elevated sulphur contents is likely to have design implications for future works involving below and above-ground concrete works. It is understood that the concrete design and specification being developed by the client team is such that the BRS does not need to be placed in locations which avoid future concrete structures,

and as such placement within the general fill layer within Area B is acceptable and will not have detrimental effect on future concrete installations.

Combustibility: Flash point/combustibility testing to confirm no self-heating risk.

Environmental: Suite per Remediation Strategy for human health and controlled waters for the receiving location.

7.3 Compliance Testing Frequencies (Minimum)

At source/after processing (natural aeration only):

- As per following extract taken from Earthworks Specification:

Acceptable Material	Test	Frequency of Testing	Test Certificate
Class 1A or 1B Granular Fill	Moisture Content (MC) and Grading	1 per 500m^3	UKAS
	OMC/MDD (4.5kg compaction)	1 per 2,000m^3	
	pH, Water soluble sulfate, Oxidisable sulfate, Total potential sulfate.	1 per 2,000m^3	
	Combustibility (flash point)	1 per 2,000m^3	

- As per chemical testing outlined in table 5/1 within the Remediation Strategy at a frequency of 1 per 100m3

In-situ: Plate load tests on a 25–30 m grid as outlined in following extract:

Method Compaction	Plate load Test	Every 25m x 25m at surface of engineered granular fill to measure settlement.	UKAS	Minimum 600mm diameter plate required. Minimum plate load pressure of 250kN/m^2 required with maximum settlement allowance of 10mm. Testing location to be surveyed and recorded. Undertaken in accordance with BS1377 1990: Part 9.

8. Engineering Design & Intended Use

Design intent: Re-use BRS onsite as a general fill layer formation build-ups for external yards/roads/working platforms where design permits. The BRS will be capped with 150mm of engineered granular fill during this phase, and other hard surfaces in future phases / final development.

Performance criteria: Minimum geotechnical parameters to meet general filling requirements per the earthworks specification; including processing to the material to resolve non-compliance applied if/as needed (i.e. screening to remove oversize or modification if NMC is outside allowable range).

Considerations: Consideration has not yet been given to the design impact the placed BRS may have on structural concrete, service corridors or other future installations. Cundall and the wider client team have confirmed that the future concrete and civils engineering design will be specified such that any interfaces with the BRS are suitably reviewed and adjusted to accommodate the potential risks of re-using BRS, such as swelling etc (i.e. resistant concrete etc).

Alternatives: Where BRS does not meet criteria, substitute with alternative compliant general fill (other streams of Class 1 or 2 are available onsite) or process into a compliant material (limited to natural aeration to improve moisture content only).

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9. Processing & Pre-Placement Controls

If the BRS is shown to be geotechnically unsuitable in its stockpiled state, the following will be considered/undertaken. This is expected to be required for the hot-spot location within Zone C:

Segregation: Pick/segregate oversized, deleterious, or non-conforming inclusions (wood, plastic, metal, tar/asphalt unless designated).

Screening/Crushing: Not allowable under this mechanism and is not to be undertaken.

Moisture Conditioning: Natural aeration only, no addition of lime or cement or other additive is to be undertaken.

Stockpile Management: Manage slopes, drainage, and run-off; maintain separate stockpile area for non-conforming material.

Pre-Works Trials: Compaction trial to confirm plant, layer thickness, number of passes, and target densities/deflections and to give allowable MC range. Compaction trial to be completed in line with Technical Submission 4 (Appendix 4), and validated on a summary exampled in Appendix 10

No BRS will be placed until each of the following conditions have been met:

- Confirmation that the permitting mechanism is approved and the BRS can be placed per this document
- Formation is approved per the Formation Technical Submission 2 (Appendix 4) in the proposed area of re-use (see Section 10 for details of placement proposals)
- BRS is suitably classified in line with the Earthworks Specification and Remediation Strategy and deemed compliant for re-use within the works.

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10. Earthworks Methodology (Placement)

Sub-Formation Preparation: Proof-roll underside of BRS; remove soft spots and organics and investigate suspected hard-spots which may represent buried obstructions; see Technical Submission 2 (Appendix 4)

Starter Layer: No starter layer is specified and so the BRS will be placed on formation level with no membrane, starter layer or other separation/barrier.

Compaction: Use agreed plant as calculated from the Compaction Trial Pad; achieving required compaction requirements per the Earthworks Specification – demonstrated by testing as outlined in Section 7 and 11.

Formation Preparation: Slightly 'over-fill' BRS final layer to proposed formation levels (approximately 50mm) such that post-compaction, a slow and methodical final trim can be undertaken to achieve Formation (underside of 150mm aggregate) to tolerance, with a final compaction sealing the Formation layer prior to final testing, surveying and inspection.

Protection: Prevent ponding during filling works by avoiding low-spots; shape falls to shed surface water and install temporary grips, sumps, attenuation areas as required – to be managed onsite on a day-to-day basis; regulate layer to tight tolerance (both to ensure compaction is correct, and to achieve final formation levels) ahead of overlying works – GPS Guided machinery (D6 Dozer) will be used to ensure layer depth and level compliance whilst avoiding re-work and more manual methods. The BRS will not be trafficked by construction plant (especially during periods of wet weather) to avoid degrading the material, and will be covered with the Engineered aggregate layer as soon as is practicable.

Hold Points/Inspections: Compaction trial pad sign-off, Formation inspection, regular layer depth and placement inspections, grid testing sign-offs, completion surveys and handovers.

Proposed re-use location: In line with EA correspondence, final material placement location will be dependent on the progression of the works at the time the permit is granted. The Environmental Site Setting and Design Report (ESSD), produced by Cundall to support the application indicates that there are no environmental constraints to the location of this material on site and no residual pollutant linkage will exist.

The current intention is to place the stockpiled BRS material within area B, anticipated volumes:

- Anticipated volume: 17,000m^3 @ assumed 1.5t/m^3 stockpiled
- Volume once placed and compacted: 12,750m^3 @ assumed 2.0t/m^3 compacted

Based on the below standard cross-section for Area B, the average depth is expected to vary, but to be approximately 0.6m average depth. 12,750m^3 @ 0.6m depth is equivalent to a required placement area of 21,250m^2.

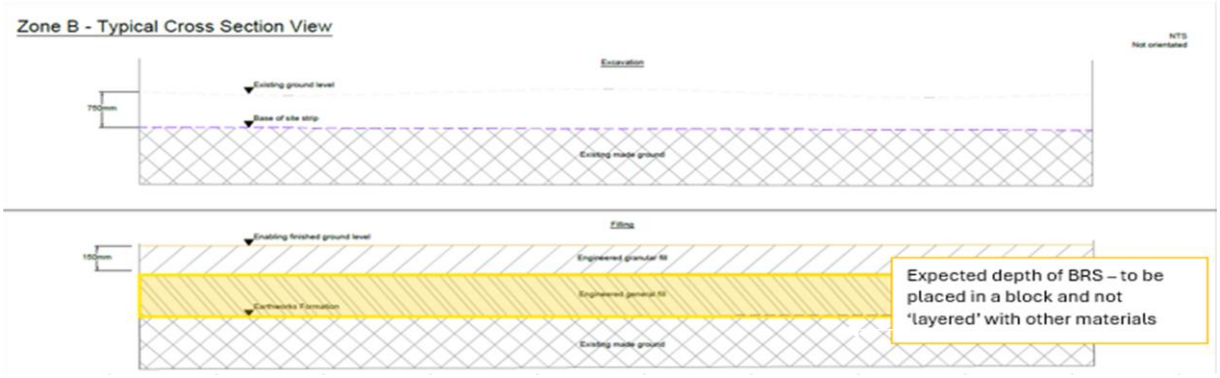

Figure 2 - Indicative cross section and layering of BRS in Zone B

Figure 3 - Intended use for burial of the compacted BRS within Zone B @ 0.6m average depth

11. Testing & Inspection Plan (ITP)

The site-wide Inspection Test Plan can be found in Appendix 7, summarised below:

Laboratory Classification Testing: (pre-placement)

Moisture Content & Grading	1/500 m^3
OMC/MDD (4.5kg)	1/2,000 m^3
Sulfate Suite (pH, WSS, Oxidisable Sulfide, TPS)	1/2,000 m^3
Combustibility/Flash Point	1/2,000 m^3

Summary of testing required during placement:

In-situ (compliance – during and on completion):

Plate Load Tests – 25m × 25 m grid at finished fill level (min 600 mm plate); to a maximum pressure of 250kn/m^2 with an allowable deformation of 10mm.

Survey & Records:

- Pre/post-placement topographic surveys; formation approval records, layer thickness and extents; test location coordinates; PLT certificates; daily records of material provenance and placement, regular drone imagery.

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12. Environmental Controls

Water Management: Maintain dry formation; use temporary drains/sumps to disperse water where found including silt pollution prevention. Formation to be left >100mm until immediately prior to the Formation Inspection to avoid potential degradation prior to BRS placement.

Dust: Damping down if required (though not expected due to anticipated during winter weather), dumpers and plant to control speed and wet routes if airborne dust is found during daily inspections, halt works in very high winds if wetting down proves insufficient, monitor at boundary regularly.

Noise/Vibration: BRS placement is at the time of writing intended to be in Area B (as noted in Section 11) which is positioned centrally onsite and is not adjacent to sensitive boundary points. Plant selection and time windows are to be strictly in accordance with planning allowances. No measures beyond those already in place for the placement of other materials are considered to be required for BRS materials.

Materials Storage: Where BRS is to be temporary stockpiled, it is to be in defined stockpiles, with no placement into standing water. Stockpiles to be regularly inspected and adjusted/revised if slopes appear unstable or logistically unsuitable.

Waste Segregation: Non-compliant arisings to quarantined and (if unsuitable for onsite aeration) then WM3 Classification process (per Technical Submission 5 – Appendix 4) and off-site dispose to be undertaken – this may be required for the anticipated hot-spot location with Area C, but not anticipated for the general BRS materials.

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13. Health, Safety & CDM

The site-wide Construction Phase Plan (Appendix 5) and Earthworks Risk Assessment and Method Statement (Appendix 6) will be followed, alongside regular Toolbox Talks, daily briefings and task specific instructions – all to be regularly reviewed by the delivery team and adjusted/improved as required.

RAMS: Existing safety documentation will be adjusted to accommodate the specific BRS placement operation (if required), though it is expected to be placed in an operation identical to the placement of other general fill materials across rite. Similarly, if the BRS requires processing (screening etc) then the existing H&S protocols will be reviewed and adjusted to accommodate BRS. The primary H&S risks to be considered include movement of plant and machinery, deep excavations, stability of stockpiles, plant interactions, siliceous dust and water run-off.

Temporary Works: Site wide haul roads, working platforms, slopes etc to be reviewed with informal daily inspections. No formal temporary works design is expected to be required for the BRS placement operation.

UXO & Services: Follow UXO plan; permit-to-dig; service clearance, which it outlined within the CPP and accompanying documents.

Future Design Implications:

MGL are to provide Cundall and the wider client team with detailed surveys showing the location of all BRS onsite, such that future design developments are calculated in such a way the BRS causes no detrimental chemical or geophysical issues in future works. The majority of Area B is expected to be hard-landscaping (concrete, tarmac, paving etc) and therefore no additional clean-cover considerations are required.

If, the future permanent design within Area B (not yet confirmed) means the BRS is positioned below soft-landscape areas, the permanent soft-landscape design will need to consider potential clean-cover requirements in accordance with the Remediation Strategy. This is not considered in this document, but will be designed into the landscape levels by the client team as the project progresses.

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14. Risk Management

Key risks and mitigations include:

Soft/Compressible Subgrade: Complete formation in line with Technical Submission 2 (Appendix 4).

Aggressive Ground/Sulphate Swell: Cundall and future design teams to specify future works such that they are not detrimentally effected by the chemical nature of the BRS. This is not anticipated to be an abnormal risk.

Perched Water/Shallow Groundwater: Construction drainage and sequencing; avoid trafficking wet subgrades in line with Surface Water Management Plan.

Below-Ground Obstructions/Unknowns: To be removed in line with Technical Submission 3 (Appendix 4), with all backfilling of obstructions to be undertaken in strict accordance with the Earthworks Specification. If significant obstructions are found beneath the proposed BRS deposition area, then the BRS may be placed in deeper pockets (i.e. to backfill a 2m deep obstruction) with the 0.6m blanket deposited above – thereby reducing the overall footprint of the BRS area. If this is the case, suitable agreement and survey records etc will be maintained and provided at Permit Surrender.

Inability to Achieve Target Stiffness: Compaction trials in line with Technical Submission 4 (Appendix 4), and testing in line with ITP (Appendix 7) and Validation Testing per Specification requirements.

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15. Programme & Sequencing

To-date during the Phase 1 Enabling works, existing BRS stockpiles have been untouched, and site-won BRS from excavations (principally from Zone C) has been stockpiled in a distinct unique stockpile close by.

Neither stockpile of BRS will be incorporated into the permanent works until the Deposit for Recovery Permit is approved to the satisfaction of all stakeholders, and its use is in line with all appended Specifications, Technical Submissions, Safety Documents etc. Any additional excavation of BRS between now and Permit approval will be stockpiled in a distinct stockpile and not deposited within the works.

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16. Tracking and Recording

The onsite movement of materials is of principle importance for compliance (both chemical, geotechnical and regarding the requisite environmental mechanisms). Currently onsite, raw concrete materials are being processed into aggregates under WRAP and general materials are being re-used under DoW CoP. Each of these operations are being strictly managed using diaries, site surveys, unique reference systems, stockpile management operations and approval procedures. Materials must be demonstrably compliant before being incorporated into the works, with a full and transparent record of all conformances and non-conformances being maintained and shared regularly.

The incorporation of the BRS into the works (only to be done once Permit is approved), will be placed using the site-wide management process which ensures placement in line with the requirements of the Specification, the Remediation Strategies and the Technical Submissions. In addition, a standalone BRS Management Validation and Tracking Document will be produced, outlining the (i) source, (ii) classification, (iii) compliance review, (iv) deposition and (v) compaction validation procedures for its placement.

Prior to the BRS placement, a task-specific briefing will be issued to the operational team to ensure the placement of BRS is contained to deposition areas as outlined within this document, with surveys, drone images and grid-tracking methods used to ensure & demonstrate no BRS is placed in unsuitable areas onsite.

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17. Deliverables

Pre-Commencement: Method Statements, RAMS, T&I plan, compaction trial proposal, testing schedules, traffic/haul plan, environmental plan, stockpile management plan etc. These documents are already in place to enable the site-wide Enabling Works Phase 1, and will be reviewed and adjusted to accommodate the BRS material stream as appropriate.

During Works: Daily records (provenance, volumes, weather), laboratory and in-situ test certificates with location plans, non-conformance reports (NCRs) and corrective actions, environmental logs – all in accordance with the appended ITP and Technical Submissions.

On completion of the BRS placement, the following will be provided:

- As-built survey (surfaces and layer thicknesses).
- Testing summary and compliance statement.
- Materials ledger (source → placement).
- Site-wide Verification/Validation Report
- Validation report for the BRS placement only

17. Drawings & Appendices

Appendix 1:	Site boundary and Phase A works area.
Appendix 2:	BRS stockpile location(s) and volumes
Appendix 3:	Intended placement zones and build-ups
Appendix 4:	Technical Submissions relevant to BRS:

- Technical Submission 1: Temporary Stockpile Invasive Species
- Technical Submission 2: Earthworks Formations
- Technical Submission 3: Buried Obstructions
- Technical Submission 4: Compaction Trials
- Technical Submission 5: Classification of Contaminated Materials
- Technical Submission 6: Reuse of PFA
- Technical Submission 7: Asbestos onsite

Appendix 5:	Construction Phase Plan
Appendix 6:	Environmental Management Plan
Appendix 7:	Inspection Test Plan
Appendix 8:	Earthworks Specification (Cundalls)
Appendix 9:	Remediation Strategy (Cundalls)
Appendix 10:	Sample Compaction Trial Report
Appendix 11:	Waste Recovery Plan
Appendix 12:	ESSD

18. Approval & Sign-Off

By signing this document (front page), the parties confirm that this Proposal satisfies the Permit requirements for Deposit for Recovery and the Project Earthworks Specification. Implementation will proceed in accordance with this document and subsequently adjusted method statements and Risk Assessments, once the requisite hold points have been satisfied.