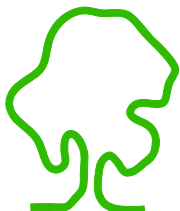


DENVER COMMERCIAL LLP

DENVER STORAGE, OKEHURST LANE, BILLINGSHURST,
WEST SUSSEX RH14 9HR

Contamination Risk Assessment

December 2024



eas ltd

Environmental Assessment Services Ltd

REPORT DATA SHEET

Requirement	Data
Report Ref:	752/DenverComLLP/CRA2024
Date	December 2024
Client	Denver Commercial LLP
Report type	Contamination Risk Assessment
Purpose	Submission to planning
Revisions	-
Prepared by	Nathaniel Scott BSc (Hons), MSc  Signed
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Contamination Risk Assessment

December 2024

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Contamination Risk Assessment

December 2024

1. BACKGROUND

- 1.1 Planning permission has been granted (under planning application DC/22/1458) for the demolition of the existing building and erection of 3 No storage units (Use Class B8), incorporating vehicular access, landscaping, and on-site parking at the site known as Denver Storage, Okehurst Lane, Billingshurst, here-on referred to as 'the site'.
- 1.2 Two pre-commencement conditions have been placed on the redevelopment for further contamination assessment and, where deemed appropriate, remediation (Condition 3), and for the confirmation of soil suitability and verification reporting (Condition 4).
- 1.3 This report follows the Preliminary Contamination Risk Assessment completed for the site, by EAS Ltd, in April 2021, and includes further contamination risk assessment and advice relating to the requirement for soil remediation. This report does not include verification of remedial works.
- 1.4 This report does not include a pre-demolition asbestos survey and/or method statement, which is to be provided by others in accordance with Planning Condition 5, please refer.

2. THE SITE & PROPOSED DEVELOPMENT

- 2.1 The site comprises a former poultry shed, and surrounding parcel of land including an area of hardstanding to the west (where a second poultry shed had been located), together with storage containers to the north, located within a disused plot of land to the south of Okehurst Lane, approximately 1 mile north of Billingshurst. The site area is approximately 0.7 ha. The Ordnance Survey (OS) map reference for the site is TQ 09068 27458. The site elevation is approximately + 50 m OD. See Appendix A for the Site Location Plan and Existing Site Layout.
- 2.2 The site is intended for commercial use comprising storage (B8). In accordance with the approved development plans, the majority of the site is to be retained under hard cover, however, the scheme does include areas of soft landscaping and the creation of a new surface water body (wildlife pond). The approved scheme plans are provided in Appendix B.

3. POTENTIAL SOURCES OF CONTAMINATION

3.1 Past land use at the site has comprised:

- Poultry Farm (1970s – ~ mid 1980s)
- Vehicle Storage (~ mid 1980s – 2005)
- Storage Yard to include the storage of vehicles (2005 onwards)

3.2 It is understood that the site remained undeveloped until the 1970s, when Denver Poultry Farm was constructed. Contaminants used within the farming of poultry include copper sulphate, which was used to maintain health of poultry. Pesticides and rodenticides were also potentially used while the site was operational as a poultry farm. Waste, including bedding and faeces, cleared from the barns is likely to have been stored in piles on site prior to offsite disposal (usually spread on local fields for fertilisation).

3.3 Potential contamination risks associated with the storage and use of vehicles, include possible storage, use and potential leakage of fuels and oils (usually stored in small quantities). The presence of concrete surfacing on site is likely to have acted as a barrier between any maintenance fluids and the underlying ground. No evidence of any significant spillage/s was noted during the site walkover.

3.4 The use of the site as a storage facility has the potential for unknown contaminants. However, storage is likely to have taken place on concrete hardstanding, acting as a barrier between potential contamination sources and the underlying ground.

3.5 Rubble piles, which appear to comprise a mix of building materials predominantly including concrete and brick, thought to have derived from the demolition of onsite buildings, have the potential to contain asbestos containing materials (ACMs).

3.6 ACMs were identified on / within the walls and roof materials of the poultry shed. These materials are to be removed from the site as part of the site's redevelopment.

3.7 No significant contamination risks associated with adjacent land uses (residential and pasture) have been identified.

4. SITE SENSITIVITY

4.1 **Environmental site sensitivity**

4.1.1 The site lies on Weald Clay Formation, which is a Secondary A Aquifer at this location. The bedrock comprises a material containing permeable layers capable of supporting water supplies at a local scale only. The area may, in some cases,

form an important source of base flow to rivers. There are no recorded watercourses or lakes within 250 m of the site.

4.1.2 The site does not lie within a Source Protection Zone and there are no groundwater, surface water or potable water abstraction licences within 2000 m of the site.

4.1.3 According to the Environment Agency flood mapping, the site lies within Flood Zone 1 (low risk of flooding).

4.2 Potential Receptors

4.2.1 It is proposed to redevelop the site for commercial use including areas of soft landscaping around the perimeter of the site, and a water body (wildlife pond) to the south of the site.

4.2.2 Future site users in this case are likely to include demolition and construction workers (during the redevelopment and future maintenance of the site), future site users (commercial and grounds maintenance), buildings and services (including underground water mains) and the wider environment.

4.2.3 Demolition and site clearance workers may be exposed to contamination including asbestos within building and waste materials on site. They may also be exposed to potential contaminants within the soils on site.

4.2.4 Construction workers working on exposed soils may be exposed to ground contamination post site clearance where any potentially contaminated soils or materials are not removed from site prior to commencing construction.

4.2.5 Future site users are considered less likely to be exposed to contamination following the redevelopment of the site during normal site activities, which are likely to be restricted to the hard standing areas of the site. Post development the soft landscaping areas are to be planted for the benefit of wildlife.

4.2.6 Post development, those appointed to undertake grounds maintenance works, including regular planting maintenance and possible repairs and below surface level works (for example on the pond, or the laying of new service lines), could be exposed to contamination within the soil, if significant contamination is permitted to remain post development.

4.2.7 The proposed scheme includes the development of a new water body (a wildlife pond). That we are aware, the feed for the pond is not yet confirmed.

4.2.8 The wider environment is not considered particularly hydrogeologically sensitive, and no sensitive habitats have been identified that are deemed likely to be impacted by the proposed future site use. However, potentially contaminative materials including ACM and potentially contaminated soils may be removed from site. Appropriate waste disposal will need to be implemented to protect the wider environment from the anthropogenic spread of contaminated wastes.

- 4.2.9 New underground service lines will need to be installed as part of the site's development. Depending on the materials used, some water supply pipework may be vulnerable to contaminants within the soil (where present). See UKWIR guidelines.

5. INTRUSIVE SITE INVESTIGATION

- 5.1 The intrusive site investigation was carried out on 6 November 2024 and comprised the excavation of 11 trial pits. The trial pits allowed for visual inspection of the underlying soil and the selection of samples for laboratory analysis.
- 5.2 The objectives of the site investigation were to confirm the nature of the underlying soil to establish or confirm whether the former land uses have resulted in contamination of the soil and/or groundwater at the site.
- 5.3 The proposed site layout and trial pit locations are shown in Appendix C, and the trial pit logs are given in Appendix D. Three of the trial pits (TP4, 7 and 8) are located toward the centre of the site, within an area which will be retained under hard cover. The remaining trial pits were located towards the boundaries of the site, within the proposed soft landscaping areas.
- 5.4 The determinands selected for analysis included those contaminants typically associated with past land use as identified in the PCRA. A full list of the contamination analysis suite and the laboratory accreditations can be found in Appendix E.

6. RESULTS

- 6.1 A total of 21 soil samples, comprising 11 upper soil samples and 10 lower soil samples, were taken during the site investigation and sent for analysis at i2 Analytical Limited of Woodshots Meadow, Watford. Copies of the sample analysis certificates, together with the laboratory's methods and accreditations, are given in Appendix E.
- 6.2 **Physical appearance and topography of the soils**
- 6.2.1 Soil conditions across the site were found to be fairly consistent, comprising a shallow layer of topsoil (sometimes under hard cover) over weathered clay becoming stiffer with depth to the undisturbed clay (natural ground).
- 6.2.2 Surfacing at TP1, 2 and 5 comprised road plannings over a shallow layer of topsoil above the clay. The remaining trial pit locations were excavated within areas without hard standing. The topsoil across the site was often found to contain small fragments of brick, and sometimes chalk.

6.2.3 Notable features identified within the trial pits included the following:

- A chalk band at 0.5 m in TP6 (sample taken at 0.45 m).
- Cobbles surrounding drainage pipe at the edge of the hardstanding at the western end of TP7.
- The ground level at TP9 was higher than that of the surrounding area, suggesting the potential deposit of materials. The topsoil layer within this location was marginally greater than that observed elsewhere within the site, however, no deposits were identified.
- Carpet and underlay found at 0.4 m at the northern end of TP10.
- Subterranean structure at TP11 comprising a concrete slab and metal runners.

6.2.4 No other evidence of potential contamination such as oil staining, unusual colouring, odour or other superficial indications of significant contamination were observed in any of the trial pits. Photographs taken at the site during the current investigation are provided in Appendix F.

6.3 Analysis of the soil samples

6.3.1 The results of the soil sample analysis have been compared with the published DEFRA Category 4 Screening Levels (C4SL) for Assessment of Land Affected by Contamination (as updated 2014) and the LQM/CIEH Suitable for Use Levels (S4UL) for Human Health Risk Assessment (2015). *Copyright Land Quality Management Limited reproduced with permission; Publication Number: S4UL3601. All rights reserved.*

6.3.2 The pH values of the soil samples were between 7.2 and 9.4 ranging from neutral to moderately alkaline. The moderate alkalinity of the samples is thought to be caused by the underlying Weald clay.

6.3.3 The toxic metal: cadmium, mercury, and the phytotoxic metals: copper, nickel, and zinc were recorded within most of the soil samples at generally low concentrations or below the limit of detection. The recorded concentrations all fall well below the current threshold values for commercial use.

6.3.4 Elevated levels of Chromium have been identified within samples taken from TP3 and TP4. Chromium mainly occurs within the environment in two forms: trivalent chromium (Cr III) and hexavalent chromium (Cr VI) with the latter being predominantly used in the production of stainless steel, and as catalysts in chemical manufacturing, while Cr III is commonly used as a dietary supplement. Given that the historic land use of the site has included use as a poultry farm, it is thought the chromium present within the site is Cr III rather than the more harmful Cr VI. Given this, both samples fall well below the exceedance values for Cr III. The presence of chromium within the site is not thought likely to be widespread or problematic.

6.3.5 Total Petroleum Hydrocarbons (TPHs) within all soil samples fell below the threshold values for commercial use.

- 6.3.6 Polycyclic Aromatic Hydrocarbons (PAHs) were recorded at generally low concentrations or below the limit of detection. However, there were three exceedances of the current threshold values for commercial use. Samples from the topsoil of TP3, TP8, and TP9 exceeded the current threshold values for chrysene, benzo(B)fluoranthene, and dibenz(a,h)anthracene
- 6.3.7 Asbestos in the form of amosite, chrysotile, and crocidolite loose fibres were identified to be present within one of the samples taken from the topsoil from TP8. Asbestos was not identified within any other samples from the site.
- 6.3.8 Further asbestos quantification, carried out by i2 Analytical Ltd, on the one sample found to contain asbestos, was found to contain 0.002% total asbestos within the sample (weighing 138g). This level is not considered to be significant.

7. INTERPRETATION OF RESULTS

- 7.1 Based on the analysis of the soil samples taken during the current CRA, it is apparent that there is some localised contamination within the site although it is not thought to be widespread across the site.
- 7.2 The two occurrences of chromium within the north of the site are not thought to be problematic as the most likely form of chromium to be encountered based on the site use history is Cr III. Levels identified within the soil fall well below the LQM/CIEH S4ULs for Cr III.
- 7.3 Exceedances of the Polycyclic Aromatic Hydrocarbons (PAHs) chrysene and benzo(B)fluoranthene were recorded within the upper samples from TP3 (located within the proposed location of the rainwater harvesting tank adjacent to the western site boundary), and TP8 (located within the southern section of the proposed hardcover). Elevated levels of these contaminants were not measured in samples elsewhere across the site. This contamination is not considered likely to be widespread.
- 7.4 The upper sample from TP9 (located within the southwest corner of the site) does not exceed the S4UL's for PAHs; however, Dibenz(a,h)anthracene was recorded at the limit for commercial use. Elevated levels of PAH can be associated with combustion including the burning of animal waste. Given the site's historic use as a poultry farm, it is considered possible that this area may have been used to deposit organic waste from the chicken sheds prior to offsite disposal or burning.
- 7.5 Whilst the presence of asbestos was identified within the upper sample of TP8 (located within the proposed hardstanding area to the south of the site), it was not identified in any other samples taken from across the site. Further quantification suggests that whilst present, the amount present within the sample is not considered significant (0.002%).

7.6 No further need for additional sampling or analysis is indicated in this case.

8. RISK ASSESSMENT

8.1 The contamination risk assessment has been produced in accordance with the recommendations given in the Defra/EA publication: *Model Procedures for the Management of Land Contaminated – Contaminated Land Report 11, 2004*.

8.2 For contamination to be significant, there must be three elements present: *Contamination* (a substance that has the potential to cause harm or cause pollution of controlled waters), a *receptor* (something that could be adversely affected by a contaminant), and a feasible *pathway* (route or means) between substance and receptor.

Contamination

8.3 Some contamination of the soils has been identified. This is limited to PAH's within the upper soils at TP3 and TP8, and loose asbestos fibres (recorded present, but not at significant levels) at TP8. Contamination is not widespread. Soils at TP3 are to be excavated for the installation of a rainwater harvesting tank. Soils at TP8 will be capped beneath permanent hard standing. The upper soil sample at TP9 was found to be at the commercial land use limit for Dibenz(a,h)anthracene. This area will form part of the soft landscaping area.

Receptor

- 8.4 In this case, the model may be applied to four cases:
- i. Demolition and construction workers engaged in the redevelopment of the site and exposed to contamination. The receptor assumed to be an adult.
 - ii. Future site users (post development) of the commercial development. Receptor assumed to include adults.
 - iii. Grounds maintenance operatives (post development). The receptor assumed to include adults.
 - iv. Post-redevelopment impacts on the wider environment includes off-site contamination migration, contamination of watercourses, etc.

An illustration of the conceptual model is provided in Appendix G.

Pathway

8.5 Exposure During Development

- 8.5.1 In this case, there is a potential risk that site workers will be exposed to PAHs and possibly asbestos during site clearance, preparation and construction.
- 8.5.2 A pre-development asbestos survey and removal scheme is to be prepared and implemented as part of the site's redevelopment. Measures to ensure that all operatives are protected during site work are to be implemented together with measures to avoid asbestos contamination of the site and wider environment.
- 8.5.3 In addition to the above, site clearance and preparation contractors should be made aware of the potential for asbestos to be found within the soils on site. Based on the findings of the intrusive site investigation, it is not suspected that asbestos soil contamination is widespread, but it is acknowledged that asbestos containing materials have been present on site and may have been present on buildings which have been demolished. We are not aware of the treatment / containment measures implemented during demolition of past buildings; therefore, it is acknowledged that soils could have been impacted, however, current soil testing has not identified any significant asbestos contamination.
- 8.5.4 During the redevelopment of the site, all site operatives should employ appropriate industrial hygiene measures. Measures should include the wearing of boots, gloves, coveralls, and dust masks. Eating and smoking should be restricted to designated clean areas.
- 8.5.5 As part of the site's redevelopment new planting is to be undertaken within the proposed soft landscaping areas together with the installation of a new wildlife pond. Much of these areas lie within the root protection area of trees which are to be retained and protected (i.e. no dig areas). No contamination of the soils was identified within the location of the proposed pond or other sampling locations around the perimeter of the site. Elevated levels of PAH were only found within one of the soil samples from the proposed soft landscaping areas and this was at the threshold level. Those appointed to undertake new planting within the soft landscaping areas are deemed most likely to be exposed to any potential PAH contamination within the retained soils. Appropriate industry hygiene measures should be implemented during this work to avoid exposure as a precaution. Once the area is planted, the risk of exposure during general vegetation maintenance (i.e. cutting and pruning) is likely to be low-negligible.

8.6 Exposure Post Development

- 8.6.1 Soil analysis indicates that the upper soil samples from TP8 exceed the threshold value for dibenz(a,h)anthracene (a PAH) for commercial land use. Analysis has also indicated the presence of asbestos fibres within TP8, although further quantification found the upper sample to contain 0.002% total asbestos (total weight of sample 138 g). The soils within this area of the site are to be retained beneath hard cover post development. In this case, the surfacing will act as a suitable barrier to prevent exposure. There will be no reasonable route of

exposure between contaminated soils retained beneath the hard cover and future site users and the wider environment. No soil remediation is recommended at this location.

- 8.6.2 Analysis indicates that the upper soil samples from TP3, located towards the northwest corner of the site, exceed the threshold values of a number of PAHs for commercial land use. The soil within this area is to be excavated to make way for the underground rainwater harvesting tank. In this case, soil excavated from this area is either to be capped beneath permanent hard standing or disposed of offsite via a suitable waste contractor. A copy of the soil analysis certificate is to be provided to the waste contractor prior to disposal.
- 8.6.3 Trial pit 9 is situated within the southern section of the site within an area of proposed soft landscaping. Soil from the upper sample from TP9 does not exceed the S4UL's for Dibenzo(a,h)anthracene, but it was recorded at the limit for commercial land use. Elevated levels of PAH were not recorded elsewhere within the other areas of proposed soft landscaping that were tested. In this case, PAH contamination of the soils on site is not considered widespread. Once planted, the risk of exposure to PAHs on site during routine vegetation maintenance is considered very low. No remediation of the soils within the proposed soft landscaping areas is indicated in this case.

8.7 Post-Redevelopment Risks to Buildings, Services, and the Wider Environment

- 8.7.1 There are no particular concerns regarding sulphate concentrations within the soil in relation to concrete foundations, etc.
- 8.7.2 Migration of contamination off-site is considered unlikely due to the low permeability of the underlying strata.
- 8.7.3 The site does not lie within a groundwater Source Protection Zone (SPZ) and is within an area which is not considered to be hydrogeologically sensitive. In this case, the proposed redevelopment of the site is not considered likely to pose a risk of contamination to the wider environment.
- 8.7.4 The site lies within a Nitrate Vulnerable Zone. Nitrate Vulnerable Zones are designated as being at risk from agricultural nitrate pollution and were introduced in order to reduce the levels of nitrates in water. The proposed redevelopment of the site is not considered likely to lead to the generation of agricultural nitrate pollution.

9. CONCLUSIONS

- 9.1 The site lies on Weald Clay Formation, which is a Secondary A Aquifer at this location, with no superficial deposits. The site does not lie within a ground water Source Protection Zone and is considered not to be particularly hydrogeologically sensitive.

- 9.2 The site is in Flood Zone 1 (minimal flood risk) and is not within 250 m of any landfill likely to present a landfill gas migration risk. The site is not within a radon affected area.
- 9.3 The site is to be redeveloped for commercial use. The majority of the site will be retained under hard cover, with the exception of a narrow belt of soft landscaping which is to include a wildlife pond within the southern section of the site.
- 9.4 Former land uses at the site have included use as a poultry farm together with use as a storage yard. The intrusive site investigation, comprising the excavation of 11 trial pits together with soil sampling and analysis, identified generally minor contamination limited to two areas of the site. Contamination was limited to Polycyclic Aromatic Hydrocarbons (PAHs) within the topsoil, together with the presence of asbestos fibres (at trace levels) within the soil at one location. The underlying Weald Clay was found to be free of any contamination.
- 9.5 PAH contamination on sites with a similar development history is not unusual. PAH contamination and elevated PAH levels were identified at three of the 11 locations tested within the site. Given the lack of any other exceedances within the site, it is not thought that contamination is widespread.
- 9.6 The overall environmental risk for the site is rated according to the risk assessment matrix in Table 9.1 below:

TABLE 9.1
RISK ASSESSMENT MATRIX

PROBABILITY OF IMPACT	CONTAMINATION POTENTIAL		
	SEVERE	MODERATE OR UNCERTAIN	MINIMAL
High	4	3	2
Medium	3	2	1
Low	2	1	1

1 = low risk, 2 = low to medium risk, 3 = medium to high risk, 4 = high risk

- 9.7 In this case, contamination of the soils on site is minimal, but not absent. The majority of the site will be contained beneath hard cover post development. In this case, the risk of exposure to future site users and the wider environment is low, however, measures will need to be taken to ensure that those appointed to undertake site clearance, preparation and redevelopment works are not exposed to contamination during the redevelopment of the site. This may be achieved through the implementation of appropriate industrial hygiene measures. See recommendations below.

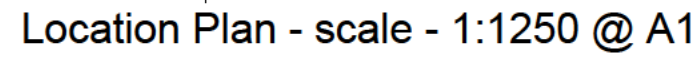
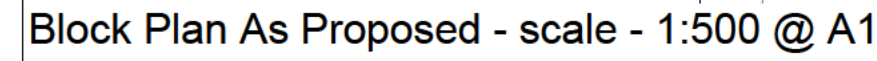
10. RECOMMENDATIONS

- 10.1 All future ground workers should be made aware of the findings of this assessment. Whilst contamination at the site is not considered to be widespread, some soil contamination has been identified.
- 10.2 Asbestos fibres were identified at very low levels within the soil at one location on site. Although the concentration of asbestos is not considered to be significant, and no asbestos was identified elsewhere, it remains possible that other fibres or fragments of asbestos may remain on site from past land use. As a result, appropriate precautions should be taken. If any further evidence of asbestos is identified during site clearance works, works should cease and advice should be sought before proceeding.
- 10.3 Groundworkers engaged in the removal of, or working within, the existing upper soil should practice appropriate industrial hygiene. Measures should include the wearing of boots, gloves, coveralls, and dust masks on dry days if dust is generated. Eating and smoking in excavations should be avoided.
- 10.4 The soil which is to be excavated within the location of the proposed rainwater harvesting tank should either be retained under hardcover or be removed from site via an appropriate waste contractor. A copy of the soil analysis certificate should be provided to the contractor.
- 10.5 Evidence that the appropriate protection and remediation measures have been carried out as part of the site's redevelopment should be recorded. This should include photographs of the work in progress, documentary evidence of the origin of any imported soils and copies of the tickets for material disposed of off-site. On completion of the works, a completion or verification report should be provided to the local planning authority in accordance with the approved scheme.

☆☆☆☆☆☆

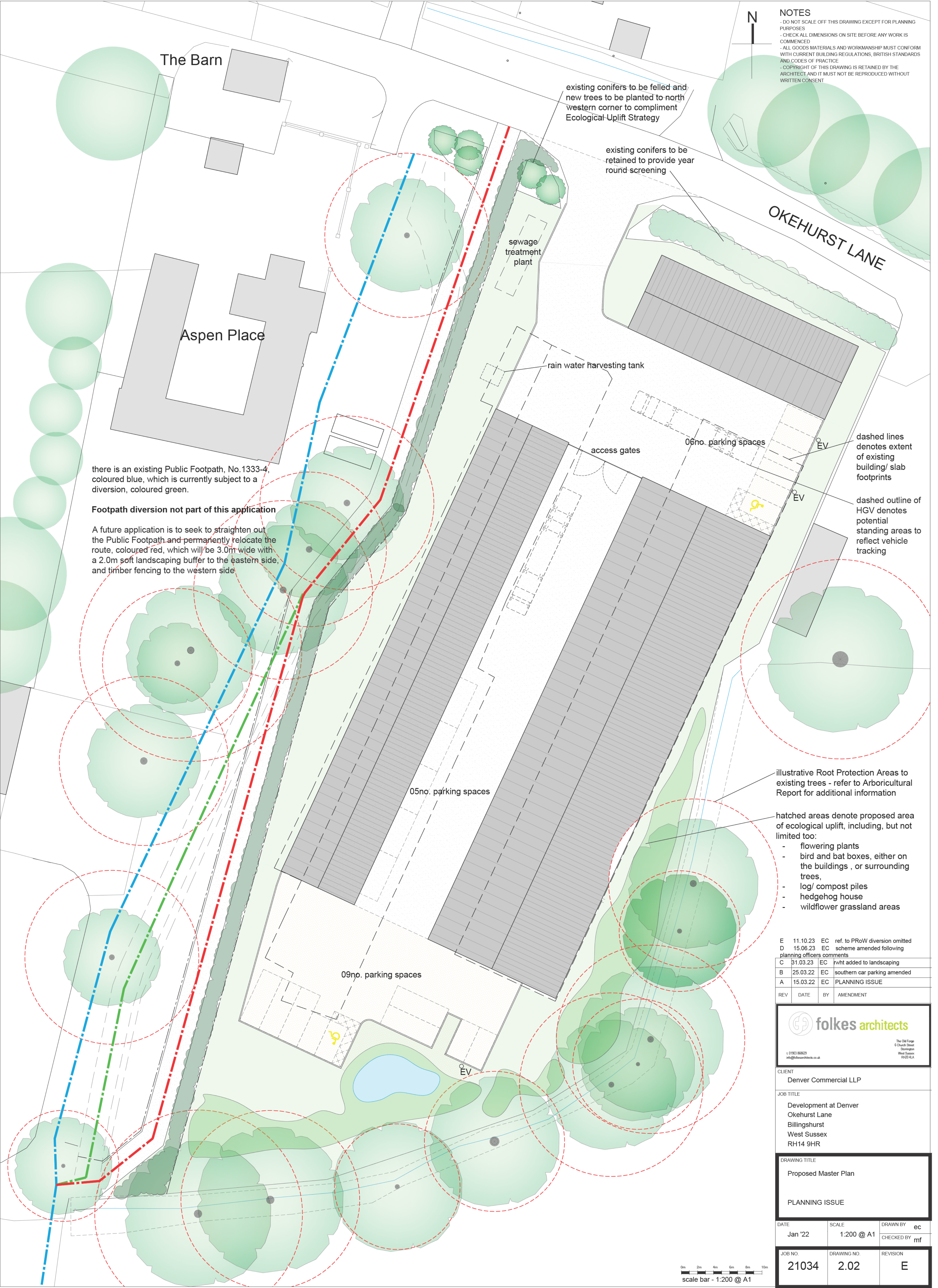
APPENDIX A: **Site Location Plan and Existing Site Layout**

- DO NOT SCALE OFF THIS DRAWING EXCEPT FOR PLANNING PURPOSES
- CHECK ALL DIMENSIONS ON SITE BEFORE ANY WORK IS COMMENCED
- ALL GOODS MATERIALS AND WORKMANSHIP MUST CONFORM WITH CURRENT BUILDING REGULATIONS, BRITISH STANDARDS AND CODES OF PRACTICE
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CLIENT Denver Commercial LLP			
JOB TITLE Development at Denver Okehurst Lane Billingshurst West Sussex RH14 9HR			
DRAWING TITLE Location & Block Plan PLANNING ISSUE			
DATE	SCALE	DRAWN BY	ec
Feb 2022	as indicated	CHECKED BY	mf
JOB NO.	DRAWING NO.	REVISION	
21034	2.01		

APPENDIX B: **Approved Development Plans**



The Barn

Aspen Place

there is an existing Public Footpath, No.1333-4, coloured blue, which is currently subject to a diversion, coloured green.

Footpath diversion not part of this application

A future application is to seek to straighten out the Public Footpath and permanently relocate the route, coloured red, which will be 3.0m wide with a 2.0m soft landscaping buffer to the eastern side, and timber fencing to the western side

existing conifers to be felled and new trees to be planted to north western corner to compliment Ecological Uplift Strategy

existing conifers to be retained to provide year round screening

sewage treatment plant

rain water harvesting tank

access gates

06no. parking spaces

EV

dashed lines denotes extent of existing building/ slab footprints

dashed outline of HGV denotes potential standing areas to reflect vehicle tracking

05no. parking spaces

09no. parking spaces

EV

NOTES

- DO NOT SCALE OFF THIS DRAWING EXCEPT FOR PLANNING PURPOSES
- CHECK ALL DIMENSIONS ON SITE BEFORE ANY WORK IS COMMENCED
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illustrative Root Protection Areas to existing trees - refer to Arboricultural Report for additional information

- hatched areas denote proposed area of ecological uplift, including, but not limited too:
- flowering plants
 - bird and bat boxes, either on the buildings , or surrounding trees,
 - log/ compost piles
 - hedgehog house
 - wildflower grassland areas

E	11.10.23	EC	ref. to PRoW diversion omitted
D	15.06.23	EC	scheme amended following planning officers comments
C	31.03.23	EC	rwht added to landscaping
B	25.03.22	EC	southern car parking amended
A	15.03.22	EC	PLANNING ISSUE
REV	DATE	BY	AMENDMENT

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CLIENT Denver Commercial LLP			
JOB TITLE Development at Denver Okehurst Lane Billingshurst West Sussex RH14 9HR			
DRAWING TITLE Proposed Master Plan			
PLANNING ISSUE			
DATE Jan '22	SCALE 1:200 @ A1	DRAWN BY ec CHECKED BY mf	
JOB NO. 21034	DRAWING NO. 2.02	REVISION E	

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scale bar - 1:200 @ A1

APPENDIX C: **Trial Pit Location Plan**

11 Proposed sample locations

