DENVER STORAGE LLP

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

Remediation and Testing Strategy

May 2026

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REPORT DATA SHEET

Requirement	Data
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Prepared by	Lucy Monday BSc (Hons), ACIEEM Signed [redacted]
Approved by	Eur Ing Malcolm McKemey BSc (Hons), CEng, CEnv, MICE, MIEAust, MCIWEM, MIEnvSc Signed [redacted]

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Remediation and Testing Strategy

May 2026

1. BACKGROUND

1.1 This Remediation and Testing Strategy follows the Contamination Risk Assessment (CRA) completed for the site known as Denver Storage on Okehurst Lane in Billingshurst, West Sussex in December 2024. The site was found to have some soil contamination for which remediation and further testing is required in order that the site may be considered fit for commercial use.

1.2 The potential for asbestos containing materials within / on the buildings (past and present) was also identified. This is being addressed separately by others.

1.3 The site has been granted planning permission under application DISC/26/0059 for the redevelopment of the site to provide 3 commercial buildings with associated access and parking, together with boundary soft landscaping including a new pond within the southern section of the site. See Appendix A for the approved plans.

1.4 The following testing and remediation scheme has been prepared in relation to Condition 3 (c) of the approved development scheme. This scheme includes:

- Removal of surfacing materials, made ground and soils deemed a potential contamination risk.
- Testing of soils to be retained within the proposed soft landscaping areas or, where not tested, details of appropriate precautionary protection measures to be implemented as part of the site's redevelopment.
- Measures to be taken where significant contamination not previously identified is found during remediation and redevelopment.
- Evidence to be obtained during development for submission to the LPA.

1.5 It is the responsibility of the developer to ensure that the Testing and Remediation Scheme is approved by Horsham District Council prior to the commencement of site clearance and remediation works and that, where approved, the scheme is implemented as part of the site's redevelopment.

1.6 A Verification Report is to be prepared in accordance with Condition 4 of the approved planning application. Evidence required for the preparation of the Verification Report is to be obtained during the redevelopment of the site as detailed within this report.

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2. REMEDIATION OBJECTIVES

2.1 The site is intended for commercial use with associated access and parking, together with boundary soft landscaping including a pond (aquatic habitat). It is intended to undertake remediation works at the site in order that:

- The site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990.
- The site will be considered fit for commercial use with soft landscaping and a pond.

2.2 This will be achieved by:

i. Removing contaminated soil and waste identified within the proposed soft landscaping areas.

ii. Removing asbestos containing materials from the buildings*.

iii. Ensuring there is no feasible pathway between any remaining contamination at the site and the proposed future site users, controlled waters or the wider environment.

*to be completed and reported separately by others.

3. PROPOSED REMEDIATION WORKS

3.1 Stage 1: Site Clearance

3.1.1 All asbestos containing materials are to be removed from the site in accordance with the asbestos removal strategy which is to be approved by the Council prior to commencement of site clearance.

3.1.2 Following removal of all asbestos containing materials, all other waste/redundant items from the buildings and the external areas of the site are to be removed.

3.1.3 Should any further potential asbestos containing items be found / suspected during site clearance works, advice is to be sought immediately from an asbestos specialist.

3.1.4 The remaining building and inner slab are to be removed / excavated as part of the redevelopment of the site. We have no reason to suspect that asbestos will be found beneath the existing flooring. However, those appointed to undertake the ground work are to report any suspected asbestos containing material(s) and advice is to be sought from an asbestos specialist, as required.

3.1.5 Following the removal of all waste, vegetation is to be cleared in order that the site can be clearly marked out to identify all proposed hard cover areas including the building footprints, the access road, parking and turning areas, and all soft landscaping areas including the proposed pond.

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3.1.6 The existing ground may be retained beneath the proposed buildings, access, parking and turning areas.

3.1.7 Surfacing and made ground in all the proposed soft landscaping areas is to be removed down to the clean, undisturbed natural ground or to a depth of 0.6 m, whichever is encountered first. Existing topsoil may be retained at this time, with exceptions*, but will be subject to further testing to confirm suitability for use. Where these soils are found to exceed the threshold for commercial land use, they are to be removed from site and replaced with clean topsoil from an uncontaminated source (see section 3.2 below for further guidance).

*The topsoil located adjacent to the northwest corner of the proposed western building (within the location of the formerly proposed rainwater harvesting tank) is to be excavated and removed from site via an appropriate waste contractor. Further testing of the retained soils adjacent to this area are then to be undertaken to confirm that all contaminated soils have been chased out.

3.1.8 The waste material is to be removed from site by an appropriately licenced waste contractor, and waste removal documentation is to be obtained and retained as evidence for inclusion within the Verification Report.

3.1.9 Waste Removal Note:

- Waste Acceptance Criteria (WAC) testing may be required prior to the removal of waste material / soils from site. A responsible person, site contractor, is to take samples of the excavated material which are to be sent to an appropriately accredited laboratory for WAC testing. The certificate of results is to be provided to the waste removal contractors in order that the waste material may be appropriately assigned and disposed of. The WAC certificate is also to be retained and provided as evidence within the Verification Report.
- All groundworkers engaged in the removal of, or working within, the existing upper soil (made ground) are to practice appropriate industrial hygiene. Measures are to include the wearing of boots, gloves and coveralls, and dust masks on dry days if dust is generated, within excavations and otherwise in contact with the made ground. Eating and smoking in excavations is to be avoided.

3.2 Stage 2: Testing and/or Protection Measures

3.2.1 Once site clearance is completed, the site is to be visited by an appropriately experienced contaminated land consultant in order to:

- Confirm and obtain evidence of site clearance, including the removal of surfacing and soils as detailed in section 3.1 above.
- Make a visual assessment and record of ground conditions (for use in the Verification Report).

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- Provide advice regarding any further soil or made ground removal, soil testing and the use of geotextile membranes.
- Take samples for laboratory analysis. The results to be reviewed and further action to be taken should contamination be identified.

Testing and Protection Note:

- It will be the developer's responsibility to appoint and organise the attendance of the contamination consultant on completion of the excavation of soils from the soft landscaping areas, and prior to the laying of any geotextile membranes and/or imported top soils. If this does not occur, an alternative scheme or investigation will need to be prepared and submitted to the Council for approval prior to occupation.

- Where surfacing materials and any underlying made or impacted soils are removed down into the underlying clay, the risk of contamination migration through the soil is deemed to be low i.e. contamination is unlikely to migrate into the underlying clay and wider environment.

- Where soils with the potential to contain contamination are retained beneath proposed hard cover, it is deemed unlikely that contamination may spread to the wider environment and/or controlled waters, however, geotextile membranes will be required to prevent the mixing of these soils with soils of adjacent soft landscaping areas.

- It is not deemed necessary to test soils which are to be retained either beneath permanent hard standing (except where existing and/or new water mains are to be installed), or in areas where the overlying soils have been excavated into the underlying clay and a geotextile membrane is to be installed.

- Testing (sampling and laboratory analysis, to be undertaken by an appropriately accredited laboratory) must be undertaken on existing soils retained at surface level within the site in order to confirm that they are fit for use**. The test certificates are to be provided within the Verification Report and the results used to inform the updated Contamination Risk Assessment which will form part of the Verification Report.

**Testing of the soils retained at surface level within the proposed soft landscaping areas is to include a minimum of 10 samples from the retained topsoil (or surface layer soils). A proposed sample location plan is given in Appendix B. Additional sampling locations may be added subject to soil observations on site, and the results of the first round of testing. Any topsoils which are found to exceed the threshold for commercial land use are to be removed from site and a second round of testing completed.

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- The testing suite is to include (as a minimum) the following, plus any additional potential contaminants, as advised by the consultant on visual assessment of the soil conditions.
    - Banded TPHs, speciated PAHs, heavy metals and metalloids, asbestos.
    - The results of the analysis are to be compared to commercial use threshold values given in the LQM/CIEH S4ULs for Human Health Risk Assessment.

- Where any significant contamination is found, this is to be reported to the LPA and the remediation strategy updated accordingly. Remedial measures in this case are most likely to include the removal of impacted soils and further testing unless contamination is deemed severer, in which case it will be necessary to liaise with the EHO immediately.

3.3 Stage 3: Remediation Measures

3.3.1 Soil Treatment:

- The existing made ground may be retained beneath the proposed buildings, access, parking and turning areas (which are to be retained under hard cover in perpetuity). However, this excludes any temporary surfacing (such as patio surfacing in break out areas if provided) which may be removed by future site users. In these areas, the area is to be treated as soft landscaping.

- Land within the soft landscaping areas is to be subject to further testing as detailed in section 3.2 above. Where the topsoil is found to be free from significant contamination, the topsoils may be retained. However, where significant contamination which exceeds the threshold for commercial land use is identified, these soils are to be removed from site and replaced with clean topsoil, as follows.

- Clean, imported topsoil from a traceable, uncontaminated source is to be placed within planting areas, either directly onto the clean underlying natural ground or above a suitable geotextile membrane (where the made ground exceeds 0.6 m in depth and/or where the imported topsoil is to be laid immediately adjacent to soils retained under hard cover).

3.3.2 Geotextile Membrane:

- The geotextile membrane is to be of a specification to prevent the transfer of contaminants from the underlying and/or adjacent ground to the new imported topsoil, and to act as a warning barrier for those undertaking ground works on the site in the future.

- The specification sheet for the chosen geotextile membrane to be used on site is to be submitted to, and approved by, the appointed contaminated land consultant for the project prior to installation.

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3.3.3 Water Main Protection:

- New underground water mains will need to be installed as part of the site's redevelopment. Polyethylene (PE) water mains may be affected by some soil and/or groundwater contaminants. Water mains should either be laid within clean material (unlikely to be affected by any adjacent contamination) or should be laid as barrier pipes.
- Those laying the new water mains should satisfy themselves that the pipe material is suitable for the proposed route of the water main within the site (refer to the current UKWIR guidance).
- The local water authority will not lay water mains or fit water meters at properties where contamination that may affect their apparatus is suspected.

3.4 Unexpected Contamination

3.4.1 Should any unexpected contamination be identified during the redevelopment of the site, including the recovery of any previously undetected underground structures (such as tanks), advice should be sought from an appropriately experienced contaminated land specialist and, where confirmed, should be reported to Horsham District Council immediately. An investigation will be carried out and, where remediation is necessary, a revision to the remediation strategy will be prepared for approval by the Local Planning Authority where appropriate / required.

4. SITE MANAGEMENT

4.1 Prior to the start of groundwork at the site, a responsible person is to be appointed to oversee and ensure that all remediation works (as detailed in Section 3 above and summarised in Table 4.1 below) are completed and documented.

4.2 Evidence (as detailed in column 2 of Table 4.1 below) is to be collected and provided to those appointed to prepare the Verification Report.

TABLE 4.1: Summary of Remediation Works and Evidence Requirements

Remediation Works	Evidence
Removal of all asbestos containing materials. Refer to section 3.1.1 above.	• Work and recording to be undertaken by others. Evidence to be provided for the Verification Report.
Removal of all 'loose' waste / redundant items from the site (not including soil / made ground) and	• Photographs of the site following clearance.

vegetation clearance. Refer to section 3.1.2 – 3.1.3 above.	• Record of correspondence with asbestos specialist, should any asbestos containing materials be found / suspected.
Demolition and excavation of the floor slab, and asbestos check. Refer to Section 3.1.4 above.	• Disposal certificates. • Photographs of the site following clearance. • Record of correspondence with asbestos specialist, should any asbestos containing materials be found / suspected.
Mark out and identify all soft landscaping areas within the site and the pond. Refer to section 3.1.5 above.	• Photographs of marker posts confirming the location of soft landscape and hard landscape boundaries / interfaces.
Removal of surfacing and any made ground within all proposed soft landscaping areas. Refer to section 3.1.7 – 3.1.9 above.	• Disposal certificates. • Photographs.
Removal of existing topsoil from soft landscaping area adjacent to the northwest corner of the proposed western building. Refer to section 3.1.7*	• Disposal certificates. • Photographs.
Contaminated land specialist site check. Refer to section 3.2 above.	• Records of correspondence from the contaminated land specialist confirming: ○ Measured levels / depths. ○ Photographs. ○ Geotextile membrane locations. ○ Sampling locations. ○ Analysis certificate/s.
Laying of a geotextile membrane and clean (uncontaminated) topsoil within the soft landscaping areas. Refer to 3.3.1 and 3.3.2 above.	• Manufacturer's geotextile membrane specification. • Photographs of the membrane. • Topsoil certificate/s.
Laying of new water mains. Refer to section 3.3.3 above.	• Water provider correspondence.
Ongoing observations / awareness for the potential of unexpected contamination. Refer to section 3.4.1 above.	• Correspondence and/or reporting between the developer, contaminated land specialist and Horsham District Council.

4.3 On completion of the remediation works, a Verification Report is to be provided for the benefit of the Local Planning Authority (Horsham District Council) and the insurers/guarantee providers. The Verification Report is to be submitted to

the Council on completion of the remediation works and prior to occupation. This report is to include evidence of the remediation works completed, together with confirmation that the site is considered 'fit' for commercial use (updated conceptual model and risk assessment), as appropriate, and to confirm any ongoing monitoring, if required.

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APPENDIX A: **Site Plans**

NOTES

- 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
- COPYRIGHT OF THIS DRAWING IS RETAINED BY THE ARCHITECT AND IT MUST NOT BE REPRODUCED WITHOUT WRITTEN CONSENT



Block Plan As Proposed - scale - 1:500 @ A1



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Location Plan - scale - 1:1250 @ A1

0 20 40 60 80 100

scale bar - 1:1250 @ A1

scale bar - 1:500 @ A1

REV	DATE	BY	AMENDMENT

folkes architects
The Old Forge
6 Church Street
Storrington
West Sussex
RH20 4LA
t. 01903 868629
info@folkesarchitects.co.uk

CLIENT
Denver Commercial LLP

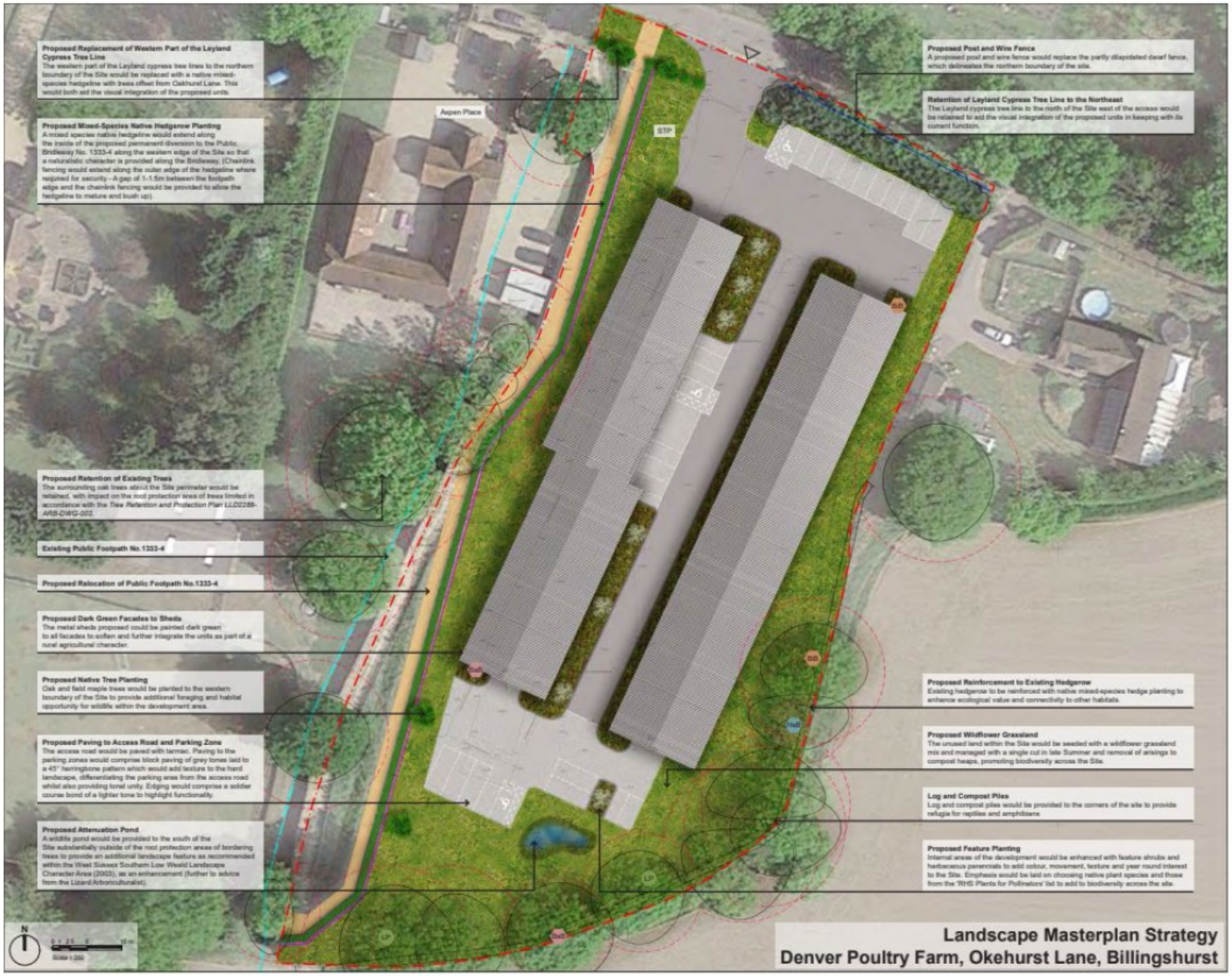
JOB TITLE
Development at Denver
Okehurst Lane
Billingshurst
West Sussex
RH14 9HR

DRAWING TITLE
Location & Block Plan

PLANNING ISSUE

DATE	SCALE	DRAWN BY
Feb 2022	as indicated	ec
		CHECKED BY mf

JOB NO.	DRAWING NO.	REVISION
21034	2.01	



Legend

- Site Boundary
- Existing Treeline
- Existing Hedgerow
- Existing Trees (with associated Root Protection Areas)

SOFT LANDSCAPE

- Proposed Native Tree Planting
- Proposed Mixed-Species Native Hedgerow
- Proposed Mixed-Species Native Hedgeline
- Proposed Feature Planting
- Proposed Wildflower Grassland
- Proposed Attenuation Pond

HARD LANDSCAPE

- Proposed Tarmac Paving
- Proposed Block Paving
- Proposed Chainlink Fence
- Proposed Post and Wire Fence

PUBLIC RIGHTS OF WAY

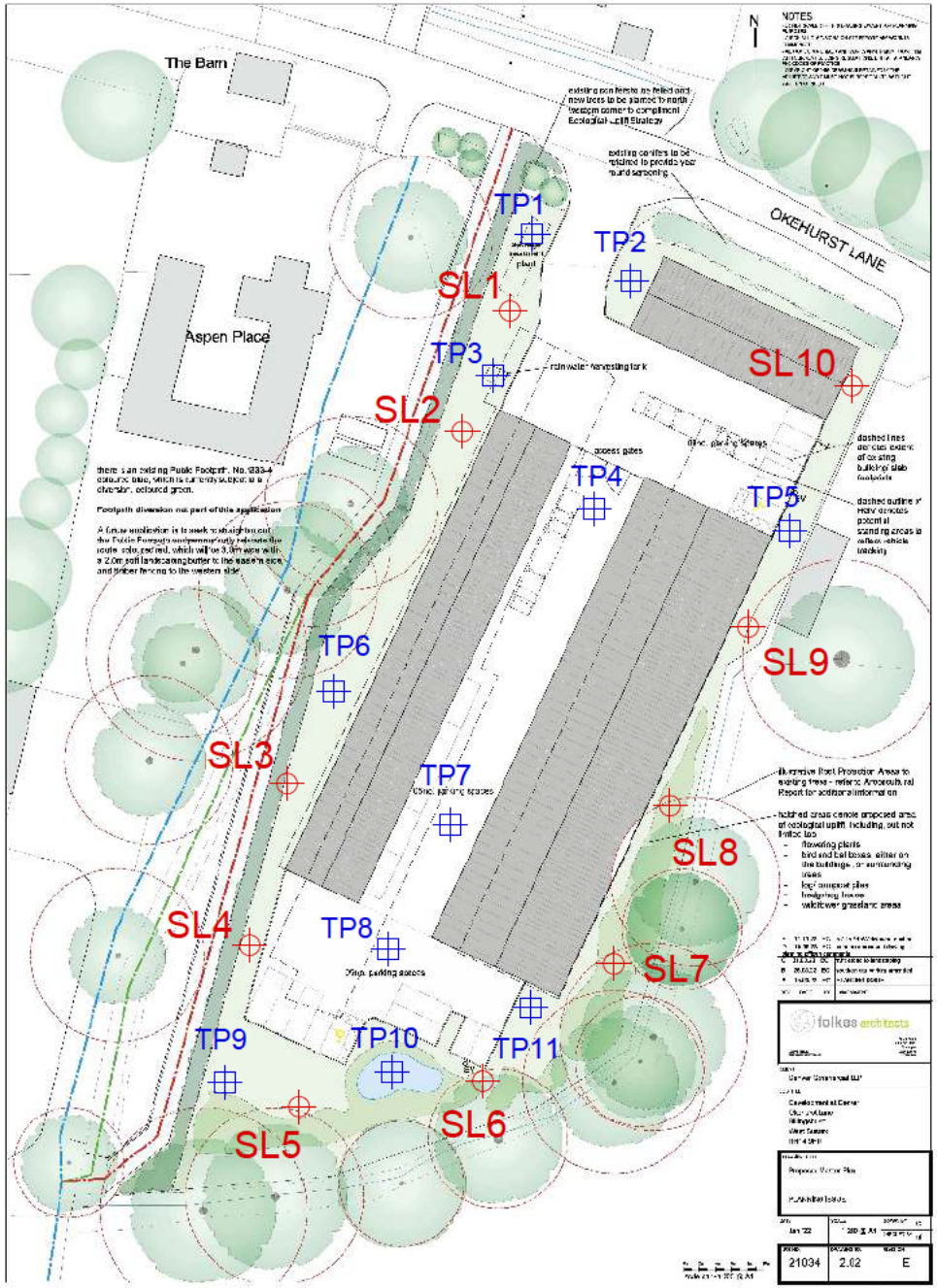
- Existing Public Footpath No.1333-4
- Proposed Relocation of Public Footpath No.1333-4

ENHANCEMENTS

- BxB: Bird boxes would be proposed to the northern aspect of mature trees and proposed buildings.
- BaB: Bat Box would be proposed to the southern aspect of mature trees and proposed buildings.
- HogB: Hedgehog Box
- LP: Log and Compost Piles

Figure 4.1. Landscape Masterplan Strategy

APPENDIX B: **Sample Location Plan**



DENVER STORAGE LLP

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

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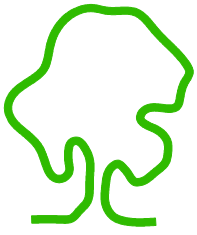
Key:

TP1 — Sample locations - completed

SL1 — Sample locations - to be completed



eas ltd
Environmental Assessment Services Ltd
Unit 4B, The Courtyard, Holmsted Farm, Staplefield Road, Cuckfield,
West Sussex, RH17 5JT
Phone : +44 (0) 1444 882552 email : info@easltd.co.uk
web site : www.easltd.co.uk