

15th July 2026

Our ref: GE23845/TG02-Rev.2/260715

Mark Iveson,
Devine Homes PLC,
St Michael's House,
111 Bell Street,
Reigate,
RH2 7LF

Dear Mark,

RE: Land North of East Street, Rusper – Remediation and Validation Plan

Further to your instruction, we write to present a Validation Plan following the removal of asbestos containing material from the Land North of East Street, Rusper.

Ground Investigation Report Review

A Ground Investigation Report was completed by Tweedie Evans Consulting Limited (TEC), dated November 2025 and shall be read in conjunction with this Validation Plan.

- Land North of East Street, Rusper – Ground Investigation Report – November 2025 - Tweedie Evans Consulting Limited (TEC). (Report Reference: 2509007.001.01).

The Ground Investigation Report highlighted two stockpiles located in the south of the site, 'Stockpile 1' and 'Stockpile 2', both of which were visually observed to contain suspected asbestos containing materials. The following stockpile descriptions and photographs were presented within Appendix A of the Ground Investigation Report:

	
<u>Stockpile 1:</u> 'View of stockpile 1, mainly potential asbestos containing material (old roofing sheets) within the southwestern area of the site.'	<u>Stockpile 2:</u> 'View of stockpile 2, containing material of limestone brick, red brick, wood, asbestos sheeting, tile, ceramics, charcoal, asphalt, slate, glass, rubber, roofing, plastic piping, and concrete within the southwestern area of the site.'

Table 1: Appendix A Extract from Ground Investigation Report (Report Reference: 2509007.001.01).

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The Ground Investigation Report states within Section 6, 'No visual or olfactory evidence of significant contamination was noted during the ground investigation' and 'no remedial requirements have been identified.'

A waste classification report for Stockpile 1 and Stockpile 2 was presented with Appendix I with both stockpiles being classified as 'Non-Hazardous'.

However, we consider that a fragment of each type of suspected asbestos containing material from both stockpiles shall be sent for asbestos screening and identification analysis.

If asbestos is identified within the bulk samples, the stockpiles would be classified as Hazardous waste due to visible asbestos containing material. Remediation would be required on-site for the proposed end-use of residential housing with private gardens and communal soft landscaping.

Human Health vs Asbestos Containing Material within Stockpile 1 and Stockpile 2

Source:

Asbestos containing material was visually identified within Stockpile 1 and 2 within The Ground Investigation Report.

Pathways:

The principal potential contaminant pathway for asbestos is through exposure to, and inhalation of, fibres either directly by the receptor or indirectly via transfer (e.g. on clothing) with later release and inhalation.

The length of a contaminant pathway will affect the likelihood of exposure to asbestos fibres. The closer a receptor is to the source the more likely it is that they will be exposed to asbestos fibres, and vice versa, due to dispersion in the atmosphere. However, this contaminant pathway only becomes active when some disturbance of the asbestos has occurred allowing release of fibres. Therefore, the potential activities that could result in the release of fibres can also be considered as part of the pathway. Geo-Environmental has considered the site and the potential activities that could reasonably be assumed to occur and identified the following:

- Disturbance of asbestos impacted soils;
- Clothing;
- Vehicle movement; and
- Weathering.

Receptors:

Asbestos is harmful to human health through inhalation of airborne fibres. The following potential receptors have been identified:

- Construction workers;
- Neighbouring land users;
- General public; and
- Future site users.

Construction workers are considered to be the principal receptor due to working in close proximity and disturbing the impacted Made Ground to facilitate the proposed development.



Contaminant Linkages

A plausible contaminant linkage exists between the visually identified asbestos contamination on-site and potential receptors.

Legislative Requirements

Once the suspected asbestos containing material(s) have been identified, the proposed asbestos works may be classified by the contractor completing the remedial works. The contractor shall work to an approved Asbestos Plan of Works, with operatives appropriately trained and competent for the works.

Remediation Requirements

If asbestos is identified within the bulk samples, it is recommended that the stockpiles are removed in bulk from site as Hazardous waste, directly to a licenced acceptance facility, as opposed to processing the stockpiles on-site. This recommendation is based upon the volume of suspected asbestos containing material visible in the photographs within the Ground Investigation Report and to prevent potential cross contamination with surrounding soils.

The works shall be completed under asbestos controls, working to an approved Asbestos Plan of Works. Appropriate dust suppression must be available during the removal works.

Waste transfer documentation (Hazardous Waste Consignment Notes) are required to be kept and a Waste Audit produced to provide evidence the material was removed from site as Hazardous waste to a licensed acceptance facility.

Validation of Stockpile Footprints

Following the removal of the stockpiles and any impacted soil, down to natural soil, a surface inspection shall be completed to confirm no visible asbestos containing material remains.

Representative validation soil samples shall then be obtained from the exposed surface on a 5m grid system across the stockpile footprints to ensure conformance with the remedial criteria outlined within Table 2. As both stockpiles are located in proposed areas of communal soft landscaping the remediation criteria are based on Atkins ATRISK Soil Values for Public Open Space (Residential).

Determinand	Remedial Criteria (End Use: Residential With Home Grown Produce/Plant Uptake) (mg/kg)
Heavy Metals	
Arsenic	79.1
Beryllium	2.19
Cadmium	219
Chromium (III)	30600
Copper	16400
Lead	625
Mercury (inorganic)	474
Nickel	347
Selenium	1370

Vanadium	818
Zinc	93700
Polyaromatic Hydrocarbons	
Naphthalene	3490
Acenaphthene	14700
Fluorene	9870
Pyrene	7400
Benzo(a)pyrene	10.3
Petroleum Hydrocarbons	
Aliphatics >C5-C6	682000
Aliphatics >C6-C8	753000
Aliphatics >C8-C10	18000
Aliphatics >C10-C12	18500
Aliphatics >C12-C16	18600
Aliphatics >C16-C35	445000
Aromatics >C5-C7	140
Aromatics >C7-C8	55300
Aromatics >C8-C10	7300
Aromatics >C10-C12	7420
Aromatics >C12-C16	7470
Aromatics >C16-C21	3770
Aromatics >C21-35	3770
Other	
Asbestos	No Asbestos Detected

Table 2. Remediation Criteria Based on Atkins ATRISK Soil SSVs – Public Open Space (Residential).

If a soil sample is found to fail the remediation criteria, the associated grid square shall be reduced by a minimum of 300mm, with the resulting arisings removed from site. The location shall then be re-validated. If failures are recorded repeatedly a cover system should be considered. The required cover system makeup and thickness would depend on the failing determinand. The cover system requirements would be detailed within an addendum to this report for prior approval.

The results will then be detailed within a Verification Letter Report.

Closure

We trust we have interpreted your instructions correctly and provided sufficient information for your current requirements. Should you have any queries please do not hesitate to contact us.

Yours sincerely,
For and on Behalf of Geo-Environmental



Tom Grace MSc, BSc (Hons), FGS
Senior Consulting Engineer

