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PR/DenverStorage/CRAaddendum

Email only: [redacted]

5 May 2026

Dear Sir/Madam

DENVER STORAGE, OKEHURST LANE, BILLINGSHURST,
WEST SUSSEX, RH14 9HR
Contamination Risk Assessment 2024 – Addendum May 2026

We refer to feedback given by Horsham District Council's Environmental Health Officer (EHO), Kevin Beer, dated 16 April 2026 regarding the Contamination Risk Assessment prepared by EAS in December 2024.

The EHO has raised six points for which we provide the following information:

Points 1-3:

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.*

It is proposed to redeveloped the site for commercial use. The threshold values for commercial land use have been used in this case.

Benzo(a)pyrene was recorded at concentrations of 380mg/kg and 130mg/kg from TP3 located towards the northern end of the western boundary where it was proposed to install a rainwater tank, but which is no longer to be installed due to a retraction of the water neutrality requirements.

The higher concentration was recorded from the upper sample which was taken from the topsoil layer between 0.05 and 0.15 m bgl. The lower concentration was taken from soil excavated at the interface between the topsoil and the underlying clay at 0.2 m bgl (recorded as 'mix' on the trial pit log to indicate that the sample comprised a mix of both the topsoil and the underlying clay). *The soil test certificate should have recorded a depth of 0.2 in this case.*

sussex enterprise member

The findings indicate that the benzo(a)pyrene contamination is contained within the topsoil, and is not accumulated above the clay. This is as expected because the topsoil having a higher organic content that will bind with the benzo(a)pyrene, and the clay likely to limit/slow the downward penetration / movement of this contaminant, that will readily bind to the clay (especially where organic matter is present).

The threshold value for benzo(a)pyrene is 35/36mg/kg (subject to SOM) for commercial land use. In this case, the threshold for benzo(a)pyrene is exceeded in this location. It was recommended that the soil excavated within the location of the proposed rainwater harvesting tank should be either retained under hardcover or be removed from site via an appropriate waste contractor. The rainwater harvesting tank is no longer to be installed in this location, however, it remains our recommendation that the soil in this area be removed from site as contaminated waste.

Further detailed guidance regarding the remediation of the site, as per the staged condition of planning, should include recommendations for the chasing out of contaminated soils and testing to be completed as part of this work to confirm that only clean underlying and adjacent soils remain in the proposed soft landscaping areas prior to finishing with clean topsoil from an uncontaminated source. Evidence of this work will need to be submitted to the Council in the form of a completion / verification report.

Point 4:

The hatching (crosshatch) designed to show made/reworked ground has not printed to pdf correctly within the main document and appears as 'ticks'. The clay was found to be unworked within most of the trial pits, with two exceptions:

- TP8, where a mid brown orange clayey soil with fine brick fragments was identified down to 0.4 m bgl where the natural ground (orange weathered clay) was intercepted, and
- TP10 where the ground above 0.55 m bgl was made ground comprising a mid brown clayey soil with waste materials including carpet underlay (at 0.4 m bgl).

Other key observations from the trial pits are given in section 6.2.

Points 5 and 6:

At the time of the site visit the vegetation was tall and dense, preventing clear observation of the ground levels. It was noted that the ground level was higher at TP9 located towards the southwest corner of the site, but excavation found only a marginally deeper layer of mid brown topsoil with roots with no evidence of other materials, overlaying the natural ground (unworked) light brown clayey soil fading into blue/grey clay.

Given the site's historic use, it is considered likely that this area of the site could have been used to deposit waste. No evidence of ashes or burnt materials were found, however, dibenz(a,h)anthracene was found to be elevated suggesting the burning of organic waste is likely to have taken place in this area. Waste on site from past land uses is likely to include significant volumes of organic matter from the chicken sheds. If this matter was deposited in this location, this is also likely to have raised the ground level and created a thicker topsoil layer, as observed.

Given that the southern section of the site is to form part of the soft landscaping area, and that PAH levels were found to be elevated close to the threshold for commercial

use, it is agreed that further investigation of the soils should be undertaken as part of the site's remediation and redevelopment.

It is recommended that this be addressed within the remediation scheme for the site, to include further observations of the ground conditions and soils following vegetation clearance, and testing of the topsoils to be retained prior to planting in order to confirm if topsoil replacement is required. It is deemed unlikely that the undisturbed underlying clay will be impacted in this case.

Conclusion and Recommendations:

This letter / addendum should be passed to Horsham District Council for their information. It is then recommended that a Remediation Strategy, taking into account the findings of the CRA and this addendum, is prepared and submitted to the Council for their approval in accordance with Condition 3 part (c) of the planning approval. This work is also linked to Condition 4, which is to be taken into consideration with advice provided within the remediation plan.

Our scope and cost for the above will be provided under separate cover.

Yours sincerely

[redacted]

Lucy Monday
Director