

**LITTLE PADDOCK
HURSTON LANE
STORRINGTON
PULBOROUGH RH20 4HH**

Remedial Action Plan

Client
Church Barn Homes LLP

Report No. 6120 v3

20th May 2026



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Remedial Action Plan

Synopsis

A Remedial Action Plan has been prepared for this site on the instructions of Church Barn Homes LLP. A Phase I Environmental Assessment¹, a Phase II Geoenvironmental Assessment², an amended Phase II Geoenvironmental Assessment³ and an enhanced Phase II Geoenvironmental Assessment⁴ have been prepared for the site and should be read in conjunction with this document.

The following strategy is based on the findings of the previous reports and comments received from the Environmental Protection Officer (EPO) at Horsham District Council. Appropriate recommendations with regard to contamination, health and safety and completion of the development are included in this report, with particular emphasis paid to potential contamination.

¹ Report No. 6033-1; Phase I Environmental Assessment, Little Paddock, Hurston Lane, Storrington, Pulborough RH20 4HH; AP Geotechnics Ltd.; 10 November 2025

² Report No. 6033-2; Phase II Geoenvironmental Assessment, Little Paddock, Hurston Lane, Storrington, Pulborough RH20 4HH; AP Geotechnics Ltd.; 13 November 2025

³ Report No. 6033-2 v2; Phase II Geoenvironmental Assessment, Little Paddock, Hurston Lane, Storrington, Pulborough RH20 4HH; AP Geotechnics Ltd.; 18 November 2025

⁴ Report No. 6079; Phase II Geoenvironmental Assessment, Little Paddock, Hurston Lane, Storrington, Pulborough RH20 4HH; AP Geotechnics Ltd.; 19 January 2026

1

Background information

At the time of our first visit the site had been cleared of much of the scrub and trees previously present. The area is located to the rear of Maple Cottage which has April Cottage to its east which in turn fronts onto Hurston Lane. Along the southern boundary at the western end of the site a detached property with garage is located. At the north side of the house is a small heating oil tank located above ground within a bunded raised area. The concrete showed no sign of staining and there was no other visual or olfactory evidence of contamination.

The site is located within a residential environment with some newly constructed houses to the north and more mature properties to the east and south. The area to the west is free of development. Figure 1 of Appendix A shows the site prior to redevelopment.

It is intended to construct three detached houses on site with associated gardens, landscaping and parking.

The proposed general arrangement is given at Figure 2 of Appendix A.

Published records of the British Geological Survey (BGS) indicate the site to lie on material of the Hythe Formation. No superficial deposits are mapped at the subject site.

2

Environmental recommendations

The following summarises the conclusions of the environmental assessment provided in the published reports.

2.1

Solid phase

Contaminant testing was undertaken on selected soil samples and the results were compared with the limited number of CLEA⁵ Soil Guideline Values (SGVs) for residential land use that have been published to date. Where not available from that source, reference was also made to the LQM/CIEH S4ULs for Human Health Risk Assessment⁶.

The intrusive site investigation and additional sampling previously carried out did not reveal any contaminants, either metallic or organic, above the relevant triggers. In addition, no asbestos fibres were detected in the 11 samples analysed.

2.2

Site personnel

It is recommended that appropriate health and safety precautions, such as detailed in HS(G)66⁷ and elsewhere, should be followed by the construction workforce and others who may come into contact with potentially contaminated soil, even though not detected during the previous investigation. They shall be agreed with the Health and Safety Executive and are likely to include, but not be restricted to, the following:-

- maintain good standards of personal hygiene.
- wear personal protective clothing that is changed and cleaned frequently to eliminate skin contact.
- prevent ingestion by using washing and changing facilities at all break times.
- not eating, drinking or smoking between break times.
- control the spread of dust and airborne mists to prevent inhalation.

⁵ *The Contaminated Land Exposure Assessment Model, Department for Environment, Food and Rural Affairs, The Environment Agency, R & D Publications SGV 1 et al., March 2002*

⁶ *The LQM/CIEH S4ULs for Human Health Risk Assessment. Land Quality Press, 2015*

⁷ *Protection of workers and the general public during the development of contaminated land HS(G)66 Health and Safety Executive, 1991*

3

Remediation action plan

3.1

Securing the site

Appropriate temporary fencing shall be provided where necessary to prevent unauthorized persons entering the site, thus making the site satisfactorily secure.

3.2

Health and safety

It is emphasized that both the main contractor and any appointed sub contractors are under a statutory obligation to undertake thorough risk assessments in order to reasonably protect the Health & Safety of persons they employ.

Full details regarding the proposed working practices connected with the site works shall be agreed in advance of the commencement of any works with the local Environmental Health Officer or Health and Safety department.

Reference shall also be made to the Health and Safety Executive publication; "Protection of Workers and the General Public during the Development of Contaminated Land".

Any measures proposed in this report are suggested in order to provide a minimum level of Health & Safety provision and should not be regarded as exclusive. The inclusion of such suggested measures within the report does not absolve the main contractor or appointed sub contractor of their statutory obligations, and AP Geotechincs take no responsibility for any reliance made.

3.3

Prevention of pollution

Care shall be taken in order to minimise the production of dust generated on the site, especially in dry climatic conditions.

All vehicles leaving the site shall be clear of any potentially contaminated debris other than that to be specifically removed. Vehicles transporting wastes for disposal shall be appropriate for the required means in order to prevent release during transit.

Specific materials removed from site for subsequent disposal shall be transported to a suitably approved and licensed facility. The contractor shall maintain a full documentary record in accordance with Duty of Care including copies of all Waste Transfer Notes for verification.

The programme of works and any subsequent modification shall be maintained in such a manner as to avoid potential cross-contamination. A watching brief shall be maintained and AP Geotechnics contacted in the event that evidence of any unexpected 'contamination' (odorous or discoloured soils) is encountered. The contractor shall allow for any delays resulting from the presence of possible contamination and the necessary measures thereof. AP Geotechnics shall oversee the developments as necessary in order to help maintain an appropriate standard of working practice. It is the responsibility of all personnel on site to report any evidence of possible contamination to the suitably qualified and experienced Site Agent who will contact AP Geotechnics where there is any doubt about this contamination. Should there be any doubt, an experienced Engineer from AP Geotechnics will attend site and liaise with the Environmental Protection Officer (EPO) at Horsham District Council if necessary. Any amendments required to the Remedial Strategy as a result of unexpected materials being identified on site will be agreed with the EPO prior to being undertaken on site.

3.4

Remediation

At present, the source, in the source-pathway-receptor relationship is absent and no remediation / mitigation is considered necessary, based on the investigations to date. Section 4 recommends steps to be taken by site personnel.

3.5

Water services

It is expected that due to the previous use of the site as detailed within the Phase I Environmental Assessment report and the absence of a contaminant source a “standard” water pipe system will be possible. However, the choice of potable water supply pipes (standard or barrier) shall be confirmed with the local water authority.

3.6

Validation of soils

Due to very wet conditions at the start of the development, some 200 - 300 mm of soil was removed from the locations of the proposed properties to aid vehicle movement. The soil has been stockpiled on site. In addition, foundation arisings have also been stockpiled on site. Figure 3 at Appendix A is a recent drone shot showing the location of the two spoil heaps. The site won material is to be reused in garden and soft landscaping areas.

Additional testing and validation of these soils is required by Horsham District Council and should ideally be done when it has been placed, but as a minimum be undertaken on site. The following amount of validation testing is recommended:- soils shall be analysed at a rate of 1 sample per 50 m³ of material. The same testing frequency shall be undertaken on any imported soils.

All samples will be analysed for asbestos, CLEA metals, phenols, speciated PAH and TPH at an MCERTS accredited laboratory.

If any of the soil samples are found to contain contaminants above the relevant triggers then additional samples will be recovered from within the same plot / area to allow statistical analysis of the results to be undertaken in accordance with the methodology described in R&D Publication CLR 7⁸, namely the Mean Value Test. If the Mean Value Test still proves unacceptable levels of contamination are present, then mitigation will be required either by removal of the affected soils or by the introduction of 450 mm thickness of extra capping material, which itself should be sampled.

4

Discovery strategy and watching brief

During the course of the development it will be the responsibility of the on-site manager to ensure watching briefs are undertaken and documented.

The watching brief will consist of a record of:

- observations of contamination made during the course of the development by any member of site staff, contractor or visitor; and
- the key stages of the development and occurrences including contamination found during the course of the development, the formation levels of excavations, any reduced level dig/mass excavation, formation of landscaping or garden areas, etc., with supporting photographs.

⁸ *Assessment of Risks to Human Health from Land Contamination: An Overview of the Development of Soil Guideline Values and Related Research. Department for Environment, Food and Rural Affairs The Environment Agency R & D Publication CLR 7, March 2002*

4.1

Watching brief written statement

Upon completion of the development, a written and signed statement will be prepared by the following parties:

ground works contractor(s) - upon completion of foundations and ground works;

on-site manager - upon completion of groundworks and landscaping work; and

appointed environmental consultant - upon completion of groundworks and landscaping works.

The written statement will clearly state whether or not evidence of contamination was identified during the course of the development along with any remedial action that was taken.

4.2

Staff training

All site staff, contractors and visitors, will be briefed on the potential presence of land, groundwater or airborne contamination before commencing work on the site.

This will include the following information:

relevant health & safety considerations;

the type of land, water or airborne contamination present and potentially present at the site;

any particular areas of the site which are likely to be affected; and

staff responsibilities under the discovery strategy.

The on-site manager will provide written confirmation that site staff were briefed about contaminated land in line with these recommendations.

4.3

Construction workers risk assessments

A detailed health and safety risk assessment will be carried out, in accordance with current guidance, before works commence on-site and appropriate personal protective equipment will be worn by all construction workers.

4.4

Discovery Strategy

If unexpected contamination is found at any time then this will be reported to the EPO within seven days and the development will be halted on that part of the site.

The discovery strategy sets out the actions that will be taken if contamination is encountered during the course of a development. Examples of the types of observations that will be considered are detailed in Table 1, following which examples of the general actions that will be taken are set out in Table 2. Examples of any emergency actions required are detailed in Table 3.

Table 1 : Potentially significant observations (not exhaustive)

Evidence	Description
Visual	- Fuel or oil-like substances mixed in with or smeared on the soil or floating on perched groundwater or surface waters. - Waste materials (refuse, barrels, industrial wastes, ash, tar, etc.) buried at specific location across the site. - Marked variation in colour, e.g. red, orange, yellow, green, light or dark blue, etc. may indicate contamination from a variety of contaminants. - Soils containing large amounts of ash and clinker where such contamination of soils wasn't expected. - Evidence of suspected asbestos.
Odours	- Fuel, oil and chemical-type odours. - Unusual odours such as sweet or fishy odours.
Well-being	- Light headedness and/or nausea when in excavations, at the working face of an excavation, when visual or olfactory evidence of contamination exists, etc. - Burning of nasal passages, throat, lungs or skin. - Blistering or reddening of skin due to contact with soil.

Table 2: General actions to be performed

Person observing contamination	To be reported to	Action to be taken
Site visitor	Must report observations to the site manager.	Stop work and where possible, make area safe and secure area before reporting to site manager.
Contractor	Must report observations to the site manager.	Stop work and where possible, make area safe and secure area before reporting to site manager.
On site manager	Must report observations to their direct manager, the appointed Environmental Consultant, the Planning Authority and EPO.	Stop work and, where possible, make area safe and secure area before reporting to others.
Environmental Consultant	Must report observations to the site manager, the planning Authority and EPO.	Advise that work stops and where possible, make sure the area is made safe before reporting to others.

Table 3: Emergency actions to be performed

Occurrence	Description	Contact
Risk to the public	If at any point residents, the public or other may be at risk as a result of contamination found during the course of investigation, remediation or development works.	• Contact the emergency services if there is a risk to life. • EPO. • Health & Safety Executive.
Nuisance to residents/the public	If a nuisance has been or is likely to be caused to nearby residents, the public and others - for example, odours, dust, noise, vibration, etc.	• Environmental Health at Horsham District Council.
Pollution of controlled waters	If any surface, culverted or groundwater has been polluted, e.g. slurry, contaminated soil/water or a chemical spillage entering a river or canal.	• Environmental Agency. • Planning Authority and EPO.
Pollution of adjoining land	If land outside the boundary of the development site is polluted from site activities, e.g. slurry, contaminated soil/water or a chemical spillage.	• The owner of the land. • Planning Authority and EPO.

In addition to the above, the following shall also be noted:

should gross contamination be encountered during groundworks the advice of an environmental consultant will be sought;

any soil arising from areas where visual or olfactory evidence of contamination has been observed will be handled as potentially hazardous waste and temporarily stockpiled appropriately;

stockpiled soils may undergo validation testing to determine whether they can be used elsewhere on site at or close to the ground; and

the EPO at Horsham District Council will be contacted to agree any further remedial works that become necessary during the course of the development.

5

Verification report

A validation and completion report covering all aspects of the measures undertaken on site as described in this Remediation Action Plan will be provided to the EPO to verify completion in order to comply with statutory requirements. This will include validation of soils to be reused.

The report will detail fully any actions undertaken, including any report from the discovery strategy and watching brief.

Progress photographs with a suitable scale and identification notes may be taken on site and included in the completion report along with details of quantities of material excavated, exported and imported.

Copies of all waste transfer notices, must be kept and copies must be provided to AP Geotechnics upon completion of the works for inclusion within the completion report.

Finally the report will include the aforementioned declaration from the site manager, groundworks contractor and appointed environmental consultant stating that either no suspected additional contamination was detected, or, that all additional detected contamination has been addressed appropriately.

R G Chapman
AP GEOTECHNICS LTD.
20th May 2026

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APPENDIX

A Figures

Figure 1: Approximate Exploratory Hole Locations

Figure 2: Proposed Development

Figure 3: Spoil Heap Locations

APPENDIX A

FIGURES



Little Paddock, Hurston Lane,
Storrington, Pulborough,
RH20 4HH

**Approximate Exploratory
Hole Locations**

Scale: as shown

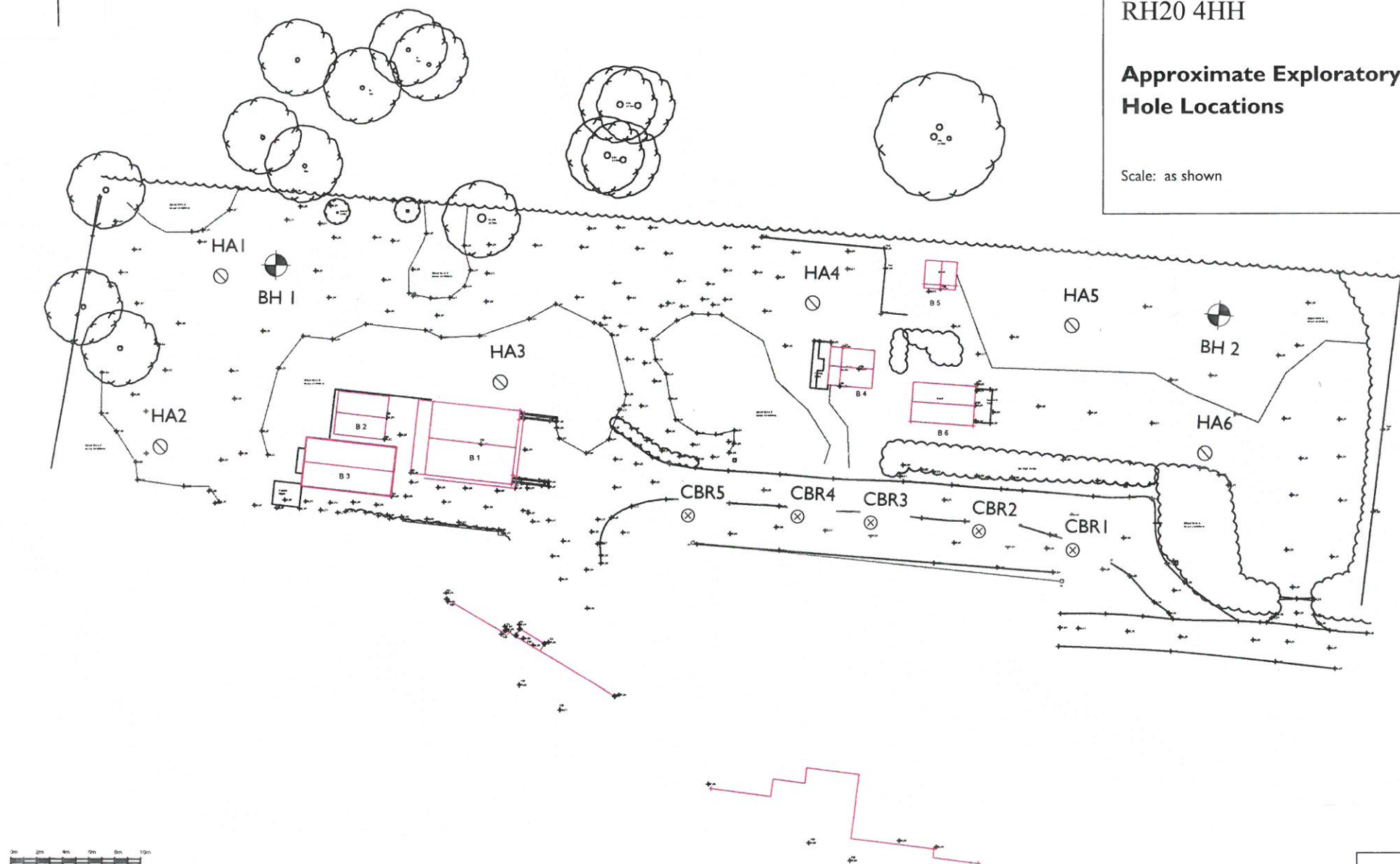


Figure 1

Little Paddock, Hurston Lane,
Storrington, Pulborough,
RH20 4HH

Proposed Development

Scale: as shown



- Managed amenity space
- Private garden
- Existing tree
- New tree
- New fence
- Concrete floor to Bin Store (bcp + Bin Collection Point)
- Permeable paving
- New foul drainage
- New surface Water drainage
- Treatment plant
- New surface Water drainage

Figure 2

Little Paddock, Hurston Lane,
Storrington, Pulborough,
RH20 4HH

Spoil Heap Locations

Scale: unknown



Figure 3