

16 December 2025

Our ref. AT/25/3751022/Plots 3,4,5, 34-35

Carl Berwick
Elivia Homes Eastern
6 Alexander Grove
Kings Hill
West Malling
Kent
ME19 4XR

Dear Carl,

Re: 3751022 Furze Field, Sayers Common – Verification Report

1. Authority

Leap Environmental, a trading name of RSK Environment Ltd (hereafter referred to as LEAP) has been appointed by Elivia Homes Eastern to inspect and validate the provision of clean cover in green space areas on a site known as Furze Field, Sayers Common, Hassocks BN6, UK. The 'Site Location Plan' is included in **Appendix B**, Drawing number: LP2746-LW-111-XX-D-G-11101-C01. The plots have been subject to placement of a geotextile membrane, clean cover in the private gardens and public open space, and in addition, gas membranes have been installed beneath buildings and independently verified. This report refers to the verification of the works carried out on Plots 3,4,5 and 34-35.

2. Previous Work

The wider site has been the subject of previous investigations by LEAP and others. The subject site itself has also previously been investigated by LEAP. The following site investigation reports have been supplied by the Client and the reader is referred to these earlier reports which should be read in conjunction with this report.

- Phase I Desk Study & Site Reconnaissance Report by LEAP, **ref LP1490/2**, on behalf of Reside Development Ltd, issued 5 May 2023.
- Phase II Investigation Report by LEAP, **ref LP2989/2**, on behalf of Reside Development Ltd, dated 5 May 2023.
- Phase III Site Investigation Report by LEAP, **ref LP003085/2**, on behalf of Reside Development Ltd, dated 9 May 2023.
- Environment Agency Letter by LEAP, **ref LP3269/EA/1**, on behalf of Reside Development Ltd, dated 23 March 2023.
- Remediation Method Statement by LEAP, **ref LP3085/RMS/3**, on behalf of Reside Development Ltd, dated 9 June 2023.

- Remediation and Earthworks Verification Report by Cognition Land+Water, ref **CLW0457**, on behalf of Elivia Homes, dated 26 July 2024.

The relevant remediation statement for the site is outlined in:

- Remediation Method Statement by LEAP, ref **LP3085/RMS/3**, on behalf of Reside Development Ltd, dated 9 June 2023.

3. Site Setting

Prior to development, the site comprised an ~3.26 hectare (Ha) disused brick field, situated off Reeds Lane, Sayers Common. It had a history of use as a brick field from c 1839 to pre-1956, with backfilling understood to have taken place following closure of the individual clay pits.

The site is mapped as being underlain by Weald Clay Formation, with identified infilled clay pits. Ground conditions encountered in LEAPs investigations comprised made ground ranging from 0.1 m to 3.6 mbgl except in the southeast and northwest corners of the site where natural ground was encountered within 1 mbgl. In the southwest corner of the site made ground in excess of 4 m was encountered. The made ground was underlain by Weald Clay comprising stiff to very stiff silty clay to the full investigation depth of 15.0 m. Groundwater was encountered within the made ground between 1.5 m to 3.4 m below ground level with monitored groundwater levels recorded between ground level to 2.0 mbgl.

The site is characterised by the presence of former brickwork pits that had been infilled with miscellaneous reclaimed materials from the Hole & Sons family construction and plant hire business.

The site is being redeveloped to provide 36 residential dwellings with private gardens, access roads, and a strip of open green space in the north of the site. A site location plan and proposed development plan can be seen in **Appendix B**, Drawing ref LW-111-XX-D-G-11101-C01 and LW-222-XX-D-G-22204-C01.

3.1 Results of Phase III Intrusive Investigation

Following a Phase III Investigation by LEAP, the site was divided into three zones:

- Zone A which was characterised by shallow made ground up to 1.0 m thick and encompassing the former brick works buildings in the southeast corner.
- Zone B was characterised by made ground up to 3 m deep within backfilled clay pits dating from about 1910.
- Zone C comprised older made ground up to and exceeding 4 m deep, located in infilled clay pits dating from 1839. The depth of backfill was unproven in the south eastern corner of Zone C.

As part of the intrusive works, samples of the topsoil, made ground and natural strata were collected and sent for chemical analysis for a range of potential contaminants of concern, including heavy metals, polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (TPHs) and asbestos identification. The chemical results were assessed against generic assessment criteria (GACs) based on a residential with home grown produce (resiHGP) end use, which was considered to be the most appropriate situation. Groundwater sampling and ground-gas monitoring was also carried out.

A summary of the testing and results can be seen below:

3.1.1 Soils and Human Health

- **Zone A:** Limited exceedances were encountered, with only two samples of the made ground (TP06 at 0.3 m and WS101 at 0.35 m) exceeding the criteria for lead of 200 mg/kg.
- **Zone B:** The reworked topsoil in WS02 (0.1 m) exceeded the GAC for arsenic of 37 mg/kg, whilst the sample of made ground in TP11 (0.3 m) exceeded the criteria for lead. In addition, benzo(a)pyrene exceedances were detected in samples of the made ground in WS105 (0.3 m) and WS07 (0.1 m), with the sample of made ground from WS07 also exceeding the criteria for naphthalene. The PAH exceedances in WS07 corresponded with the hydrocarbon odour noted in the soils between GL at 0.15 m
- **Zone C:** Multiple heavy metal exceedances were detected in the made ground samples, including arsenic (2 No.), lead (5 No.), nickel (1 No.) and zinc (2 No.), with the samples from WS06 (3.0 m) and WS102 (2.0 m) detecting the multiple heavy metal exceedances within one sample. Lead also exceeded the criteria in the sample of reworked topsoil from TP1 (0.1 m). Both benzo(a)pyrene and naphthalene also exceeded the relevant GACs in the made ground samples from WS06 (3.0 m) and WS09 (0.3 m).

No asbestos fibres were positively identified in the soil samples. However, a sheet of “slate” containing chrysotile was identified within a stockpile on the western boundary and a sheet of cement board containing chrysotile and crocidolite was within the made ground at 0.9 m in TP7.

3.1.2 Groundwater

Groundwater was encountered across the site between 0.4 m and 6.8 m depth, mainly within the Made Ground and locally in the Weald Clay. Monitoring in summer 2022 recorded groundwater levels between 1.41 m and 2.0 m, rising significantly in winter to between ground level and 1.75 m, with high water also observed in the southern ditch. These levels were considered to represent perched water within the Made Ground following wet winter weather.

Two groundwater sampling rounds (Nov 2022 and Jan 2023) found exceedances of EQS and DWS criteria for fluoranthene, nickel, zinc, BTEX compounds, and various petroleum hydrocarbons, with slight hydrocarbon odours noted in January samples.

Although the Weald Clay is generally classed as Unproductive Strata, the possibility of an underlying sandstone unit hydraulically connected to the Made Ground water body means there is a potential risk to the Secondary A aquifer. There is also a potential risk to onsite surface water features, particularly the ponds, which are likely in hydraulic continuity with the perched water.

3.1.3 Ground-Gas

A regime of ground-gas monitoring was carried out throughout the investigation phases. An assessment was undertaken based on the concentrations of carbon dioxide and methane and the flow rates, in line with CIRIA 655. The assessment indicated that the site would generally be classified as a Characteristic Situation 2 (CS2) due to the elevated carbon dioxide concentrations, however this may be increased to CS3 for Zone C. The presence of naphthalene also posed a potential risk through inhalation of vapours. Further gas monitoring was recommended to finalise the risk assessment.

3.2 Remediation Method Statement

The proposals for the remediation of contamination on site are detailed in the LEAP remediation method statement (RMS) (Ref: LP3162/RMS/3).

It was proposed to excavate and remediate the made ground, then suitably re-engineer selected screened material into the resulting excavations to create a level working platform. This process would allow for treatment of the majority of the made ground onsite, and thus remove most of the source of contamination. The re-engineering of the made ground would also act to remove voids and provide appropriate ground conditions for construction.

A suitable clean cover system was recommended to break the potential direct contact pathways posed to future residents.

The following key remedial activities were proposed:

- Excavation of the upper 2 m of made ground with Zones A, B and C with appropriate sorting, treatment and groundwater control and treatment as necessary to facilitate the excavation;
- Compaction of residual made ground below 2 m as necessary to protect against future settlement;
- Verification testing of the treated materials to prove suitability for reuse;
- Re-engineering of made ground in competent layers;

- Groundwater and surface water monitoring during and following treatment and placement of the made ground;
- Installation of ground gas membranes for properties across the site, with additional measures for Zone C to be determined by inspection of made ground to remain in-situ and verification monitoring of treated zones and subject to the additional monitoring.
- Provision of 600 mm clean cover system in private gardens and 300 mm in areas of soft landscaping, with a geotextile marker layer between the clean cover and underlying made ground.
- Verification of the clean cover systems.

3.3 Verification Requirements

Clean Cover Verification

It was proposed that the site won topsoil and some excavated soils may be reused as 'subsoil' within the clean cover system. As such, any made ground to be placed within the clean cover system required more conservative testing to assess the risk to future residents and ensure suitability for placement. It was proposed that the topsoil should be tested prior to placement at a frequency of 1 sample per 150 m³, and the 'subsoil' will be segregated from other made ground and tested at a frequency of 1 per 250 m³. Both were to be tested for the following contaminants: heavy metals, USEPA 16 PAHs, petroleum hydrocarbons (TPH CWG) and asbestos. The specific test parameters and GACs are appended to this report in **Appendix F**.

The thickness of clean cover materials was to be verified in one of every two private plots, and one pit in every significant area of soft landscaping.

Ground-Gas Membrane Verification

It was understood that subject to further gas monitoring, the site was classified as a minimum of a characteristic situation CS2. In line with BS8485:2015+A1:2019, this would comprise a combination of structural barrier (e.g. floor slab, or basement), ventilation measures and gas resistant membrane to be installed within the proposed developments to provide adequate mitigation from potentially hazardous concentrations of ground gases. The installation of protection measures should also provide mitigation from the vapour risk posed by the naphthalene concentrations previously encountered, which may be present in the made ground at depth.

The membranes were to be installed by and inspected by a suitably qualified third-party independent inspector who will sign off the installations prior to all concrete pours. The sign off sheets (including sub-grade acceptance forms if required) and verification certificate are to be included in the remediation verification report. The installation of the membranes was to be carried out just before screeding. Independent verification by the developer's remediation consultant prior to screeding was also recommended.

Groundwater and Surface Water Monitoring

A groundwater monitoring and sampling programme was to be undertaken during and after the remediation works to ensure that ground disturbance does not mobilise contaminants or create new pathways into the underlying Secondary A aquifer.

Groundwater sampling was to take place approximately monthly over the ~14-week remediation period, plus one post-completion visit. Samples were to be analysed for metals, PAHs, TPH (CWG) and cyanide, and assessed against DWS and EQS criteria. Existing monitoring wells to be used where possible; any wells lost during works to be identified and replaced as needed.

Because the retained ponds in the northeast could also be affected, their water quality was also to be monitored. Baseline samples were to be taken before works began, followed by monthly sampling during the works and one post-completion sample. Results to be compared to baseline conditions to confirm whether the remediation activities have impacted the ponds.

3.4 Cognition Remediation

The Cognition validation report (ref: CLW0457) details the remediation and earthworks carried out on site. The main remedial works were undertaken on the basis of the LEAP Remediation Method Statement but were not subject to attendance by LEAP and therefore the validation of the main remedial works that were carried out is based upon the reports provided.

The remediation carried out by Cognition comprised the excavation of the top 2 m of made ground within Zones A, B and C followed by mechanical segregation, hand picking, crushing and treatment before being replaced in excavated voids and compacted in accordance with a Materials Management Plan. Soil testing was undertaken to meet chemical soil re-use criterion. Soil stabilisation techniques were also adopted in areas of proposed roads and buildings. Boreholes were also recorded to be decommissioned following completion of monitoring during the remedial works. Groundwater and surface water sampling revealed no elevated levels of contaminants tested, therefore no further investigation was required.

The site won Topsoil and Subsoil were stripped, separated and stockpiled on site to be independently tested for their suitability to reuse on site in the soft landscaping. The remaining material excavated was removed from site. This was carried out in accordance with the MMP and DoWCoP.

The remedial works completed by Cognition were limited to the zones identified by LEAP based on prior investigation works which identified former buried pits. The quality of made ground and potential for gas generation in other areas of the site is uncertain.

3.5 Further Ground-Gas Assessment

Based on previous site investigations, a small portion of the made ground will likely still be present within Zone C, due to the thickness of made ground exceeding 2 m in places. Therefore, there remains the potential for ground gas generation from the made ground.

As part of the remedial strategy, it was recommended that made ground that was to be left at >2 m depth in Zone C should have been inspected prior to backfilling to evaluate the potential for ground gas generation. LEAP has not been informed or provided with documents to show the inspection or location of any remaining made ground during the remediation process.

The results of gas monitoring carried out within location boreholes WS201, WS202, WS203 and WS206 would suggest a classification of CS-1. However no reliable gas monitoring data was obtained from WS204, WS205, WS207, WS208 and WS209 throughout the monitoring visits due to the shallow groundwater on site flooding the response zones. The TOC data in these areas (including those that had been remediated) indicate a CS-2 classification. The extent of remediation works outside of zones A, B and C is also uncertain with the investigation identifying the presence of organic odours, organic material, and wood fragments.

As a precaution, a site wide CS2 classification was determined to be appropriate to mitigate against any reduction in groundwater level that may expose the remediated made ground and residual sources of degradable organic matter that may be present.

4. Clean Cover Inspection Visit Details

LEAP attended site on several occasions between 13 August 2025 and 3 December 2025 to carry out stockpile sampling of the site won material and subsequent imported material, followed by hand dug pits within the garden areas of Plots 3, 4, 5 and 34-35 and POS adjacent to Plot 3. The following section details the results of each visit.

4.1 13 August 2025

LEAP attended site on 13 August 2025 to carry out stockpile sampling of the site won Topsoil and Subsoil that had been segregated by Cognition.

The Topsoil and Subsoil had been separated and stored into separate stockpiles, with topsoil approximate volume comprising ~625 m³ and subsoil comprising ~2,983 m³.

4 locations were targeted in the Topsoil stockpile (TP09 – TP011) and 7 locations within the Subsoil stockpile (TP201 – TP207). A drawing showing the stockpile sample locations can be seen in Appendix B, drawing ref LW-222-XX-D-G-22203-C01.

The stockpiles generally comprised building waste rubble mixed with soils, comprising a brown sandy silty gravelly clay with inclusions of brick, concrete, metal, ceramic, flints and glass. Suspected ACM's were also noted throughout, described as cement bound fragments.

20No. samples (5No. Topsoil and 15No. Subsoil) were taken at depths of between 0.6 and 1m with the aid of the machine excavator on site from the stockpile and sent for chemical analysis. The Topsoil and Subsoil samples were tested for the LEAP Standard Soil Suite, which includes heavy metals, asbestos, pH, total organic carbon, and polycyclic aromatic hydrocarbons. 4No. bulk samples of the suspected ACM was also scheduled for an asbestos screen and ID.

The laboratory results were compared to the soil assessment criteria outlined in the RMS, as shown in the Screening Table in **Appendix D**. The analysis shows that elevated levels of Lead, Zinc and Benzo(a)pyrene were present above the soil assessment criteria. The laboratory test certificates are included as **Appendix E**.

Chrysotile fibres were also found in TP201/1.00 m and TP211/1.00 m and 3 out of the 4 bulk sample of the suspected ACM was positively identified as cement bound Chrysotile. Combined with the elevated levels of Lead, Zinc and B(a)P, along with the physical presence of oversized material which was outside of the specification of the RMS, it was considered that the material was **not** suitable for use in the garden areas or POS. Therefore it was recommend that this material should be removed from site.

4.2 5 November 2025

Following the removal of the previously noted contaminated Subsoil and Topsoil stockpiles, it was understood that under an MMP that had been declared for another Elivia Homes site, known as “Nolands Farm” and the use of a U1 exemption for an Elivia Homes site known as “Blackboys”, Topsoil and Subsoil had been imported for use within the private garden areas and POS at Furze Field.

LEAP attended site on the 5 November to obtain samples of the Topsoil that had been imported and stockpiled on site. 5No. samples were taken from Topsoil stockpiles (3 No. from TSP1 and 2 No. from TSP2). Photographs showing the stockpiles can be seen in Appendix C.

The Topsoil was described as a brown slightly sandy, silty CLAY. The sand was fine to medium and occasional rootlets were noted throughout.

5No. Topsoil samples were tested for the LEAP Standard Soil Suite, which includes heavy metals, asbestos, pH, total organic carbon, and polycyclic aromatic hydrocarbons. The laboratory results were compared to the soil assessment criteria outlined in the RMS, as shown in the Screening Table in **Appendix D**. The analysis shows that the Topsoil samples complied with the assessment criteria for all contaminants of concern. No asbestos was identified. The laboratory test certificates are included as **Appendix E**.

Therefore, the Topsoil from this stockpile was considered suitable for use and it was understood this would be used for Plots 3-5, 34-35 as well as the POS by Plot 3.

4.3 21 November 2025

LEAP attended site on the 21 November to obtain samples of the Subsoil that had been imported and stockpiled on site. 4No. samples were taken from the Subsoil stockpile (SSP1-4).

The Subsoil was described as a brown slightly sandy, silty CLAY. The sand was fine to medium and occasional rootlets were noted throughout. Rare brick fragments were noted.

An inspection pit was also carried out in Plot 35, which was understood to comprise previously untested imported Subsoil and the previously tested clean Topsoil that was sampled on 5 November 2025. A plan showing the location of the inspection pits can be found in drawing ref LW-222-XX-D-G-22205-C01 in **Appendix B**.

The depths within Plot 35 complied with the RMS, with a geotextile membrane visible at 700 mm below ground level, overlain by 550 mm of Subsoil and 150 mm of Topsoil. The Subsoil comprised yellowish brown silty CLAY. Rare brick fragments were noted. The Topsoil comprised dark brown slightly sandy, silty clay. Sand was fine grained and occasional rootlets noted. 1No. sample of the untested Subsoil was taken for chemical analysis. The photographs of the Plot 35 garden area can be seen in **Appendix C**. Trial hole logs can be seen in **Appendix G**.

3No. Subsoil samples (2No. from the stockpile and 1No. from Plot 35) were tested for the LEAP Standard Soil Suite, which includes heavy metals, asbestos, pH, total organic carbon, and polycyclic aromatic hydrocarbons. The laboratory results were compared to the soil assessment criteria outlined in the RMS, as shown in the Screening Table in **Appendix D**. The analysis shows that the subsoil samples complied with the assessment criteria for all contaminants of concern. No asbestos was identified. The laboratory test certificates are included in **Appendix E**.

Therefore, it was concluded that both the subsoil in the stockpile and within Plot 35 was clean and suitable for use. It was understood that the stockpile would be utilised in Plots 3-5, Plot 3 POS and Plot 34.

Given the Topsoil in Plot 35 was previously tested and passed, given the correct clean cover was noted and the subsoil testing was also found to be clean, Plot 35 was considered compliant as per the RMS.

4.4 3 December 2025

LEAP attended site on the 3 December 2025 to carry out clean cover inspection pits in Plots 3-5, Plot 34 and the POS adjacent to Plot 3. A plan showing the location of the inspection pits can be found in drawing ref LW-222-XX-D-G-22205-C01 in **Appendix B**.

Table 1 below summaries the recorded thickness of subsoil and topsoil.

Table 1: Summary of Final Topsoil & Subsoil Thicknesses

Plot Number / Location ID	Topsoil Thickness (mm)	Subsoil Thickness (mm)	Total Clean Cover Thickness (mm)	Membrane Confirmed (Y/N)
Plot 4	150	500	650	Y*
Plot 34	150	510	660	Y*

*Established using client provided photograph

Plot 3 was slightly shy of the full capping requirement of 600 mm, however it was still without turf which was expected to bring up the clean cover to the correct level.

Photographs showing the above clean cover thickness and membranes can be seen in **Appendix C**. Trial hole logs can be seen in **Appendix G**.

Therefore, following this visit, it was concluded that the clean cover within Plots 3-5, Plot 34 and the POS was compliant with the requirements of the RMS.

5. Gas Membrane Verification

An independent party installed the gas membranes as per the RMS requirements. LEAP were sent these certificates and can be seen in Appendix H. The membrane certificates for Plots 3,4,5, 34 and 35 confirm that the membranes installed by MB Membranes Ltd for these plots met the required specification for the project and the latest industry guidance.

6. Conclusion

Following the visits carried out by LEAP, the chemical analysis revealed that all imported subsoil and topsoil that was used in Plots 3-5, 34-35 and the Plot 3 POS was found to be clean and suitable for use.

The photographic evidence obtained from site also showed that the geo-textile membrane and sufficient clean cover was installed in Plots 3-5, 34-35 and the Plot 3 POS was as per the RMS requirements.

The gas membrane certification also showed that the membranes for these plots met the required specification for the project and the latest industry guidance.

It should be noted that an assessment of the soil for other properties, such as use as a growing medium, its aesthetic quality for use in gardens and its drainage properties, was outside the scope of LEAP 's commission. This should be considered by the developer prior to the reuse of the material, with due consideration to applicable guidance and standards (for example BS3882:2015¹ and BS8601:2013²).

If you have any questions, please do not hesitate to contact the undersigned.

[Redacted Signature Block]		
Alice Tettmar BSc FGS	Tim Thorpe MSci ARSM FGS	Terri Hocken
Principal Engineer	Principal Lead	Administrator

Enc.

Appendix A – Service Constraints

Appendix B – Figures

Appendix C – Photographic Record

Appendix D – Soil Screening Table

Appendix E – Laboratory Test Certificates

Appendix F – RMS Imported Soil GACs

Appendix G – Inspection Pit Logs

Appendix H – Gas Membrane Certificates

¹ BS3882: 2015. Specification for topsoil.

² BS8601: 2013. Specification for subsoil and requirements for use.

APPENDIX A – SERVICE CONSTRAINTS

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APPENDIX A

SERVICE CONSTRAINTS

1. Service Constraints

1.1. This Report (the "Report") and any study, inspection, investigation, sampling, testing and or interpretation carried out in connection with the Report (together the "Services") were compiled and carried out by RSK Environment Limited (RSK) trading as Leap Environmental or RSK Geosciences, for the Client named in the first paragraph of the Report (the "Client") in accordance with the terms of an RSK Fee Proposal including RSK Environment Standard Terms and Conditions (the "Appointment") between RSK and the Client, unless otherwise stated in the first paragraph of the Report. The Services were performed by RSK with the reasonable skill and care ordinarily exercised by a geo-environmental consultant at the time the Services were performed. Nothing in this Report shall be construed as imposing any fitness for purpose obligation. Further, and in particular, the Services were performed by RSK taking into account the limits of the scope of works required by the Client, the time scale involved and the resources, including financial and manpower resources, agreed between RSK and the Client.

1.2 Other than that, expressly contained in paragraph 1 above, RSK provides no other representation or warranty whether express or implied, in relation to the Services. RSK shall not be liable in respect of any action or proceedings arising out of or in connection with this Report whether in contract, in tort, for breach of statutory duty or otherwise after the expiry of six (6) years from either (i) the date of the Report or (ii) such earlier date as prescribed by law, unless varied in the terms of the Appointment.

1.3 Unless otherwise agreed in writing, the Services were performed by RSK exclusively for the purposes of the Client. RSK is not aware of any interest of or reliance by any party other than the Client in or on the Services. Unless expressly provided in writing, RSK does not authorise, consent, or condone any party, other than the Client relying upon the Services. Should this Report or any part of this Report, or details of the Services or any part of the Services, be made known to any such party, and such party relies thereon, that party does so wholly at its own and sole risk, and RSK disclaims any liability to such parties. Any such party would be well advised to seek independent advice from a competent geo-environmental consultant and/or lawyer.

1.4 The Client shall not, without the prior written consent of RSK, assign, transfer, charge, mortgage, subcontract, or deal in any other manner with all or any of the benefits provided in this Report. Unless specified in the Appointment, RSK shall not be obliged to assign the benefit of the Report whether by collateral warranty, third party rights pursuant to the Contracts (Rights of Third Parties) Act 1999, letter of reliance or otherwise. If RSK agrees to any assignment of the benefit of this Report, in whatever form, benefits to third parties through collateral warranties, third party rights or letters of reliance shall not be provided unless a fee for each right, warranty or letter is agreed. The form of wording used in the warranty or letter shall be provided by RSK for agreement by the Client. Any reasonable changes to the form of wording will be implemented by mutual agreement, however the terms in the warranty or letter cannot offer the third party any greater benefit than the Appointment offered to the Client.

1.5 It is the understanding of RSK that this Report is to be used for the purpose described in the introduction to the Report. That purpose was a significant factor in determining the scope and level of the Services. Should the purpose for which the Report is used, or the proposed use of the site change, this Report may no longer be valid and any further use of or reliance upon the Report in those circumstances by the Client without the review and advice of RSK shall be at the Client's sole and own risk. RSK shall not be liable for any use of this Report for any purpose other than that for which it was provided.

1.6 The passage of time may result in changes in site conditions, regulatory or other legal provisions, technology or economic conditions which could render the Report inaccurate or unreliable. The information and conclusions contained in this Report should not be relied upon in the future without the written advice of RSK. In the absence of such written advice of RSK, reliance on the Report in the future shall be at the Client's own and sole risk.

1.7 The observations and conclusions described in this Report are based solely upon the Services which were provided pursuant to the agreement between the Client and RSK. RSK has not performed any observations, investigations, studies or testing not specifically set out, or required by the Appointment between the Client and RSK. RSK is not liable for the existence of any condition, the discovery of which would require performance of services not otherwise contained in the Services. For the avoidance of doubt, unless otherwise expressly referred to in the introduction to this Report, RSK did not seek to evaluate the presence on or off site of asbestos, invasive plants, electromagnetic fields, lead paint, heavy metals, radon gas, fuel storage, persistent bio-accumulative or toxic chemicals (including PFAS and related compounds) or other radioactive or hazardous materials, unless specifically identified in the Services.

1.8 The Services are based upon RSK's observations of existing physical conditions at the Site gained from a visual inspection of the site together with RSK's interpretation of desk based publicly available information, including documentation, obtained from third parties and from the Client on the history and usage of the site, unless specifically identified in the Services and the limitations below:

- a. The Services were based on information and/or analysis provided by independent testing and information services or laboratories upon which RSK was reasonably entitled to rely.
- b. The Services were limited by the accuracy of the information, including documentation, reviewed by RSK and the observations possible at the time of the visual inspection.
- c. The Services did not attempt to independently verify the accuracy or completeness of information, documentation or materials received from the Client or third parties, including laboratories and information services, during the performance of the Services.
- d. The Client has identified in writing to RSK, the information, reports, findings, surveys and preliminary works RSK may not rely upon when providing the Services.

RSK is not liable for any inaccurate information or conclusions, the discovery of which inaccuracies required the doing of any act including the gathering of any information which was not reasonably available to RSK, and including the doing of any independent investigation of the information provided to RSK, save as otherwise provided in the terms of the Appointment between the Client and RSK.

1.9 Any site drawing(s) provided in this Report is (are) not meant to be an accurate base plan for scale measurement but is (are) used to present the general relative locations of features on, and surrounding, the site. Features (intrusive and sample locations etc) annotated on site plans are not drawn to scale but are centred over the approximate location. Such features should not be used for accurate setting out and should be considered indicative only.

1.10 Should RSK be requested to review the Report after the date of issue of this Report, RSK shall be entitled to additional payment at the existing rates, or such other terms as agreed between RSK and the Client.

2. Service Constraints where the Report provides an intrusive assessment of ground conditions:

2.1 The intrusive environmental ground investigation aspects of the Services are a limited sampling of soil from the site, at pre-determined locations based on the known historic / operational configuration of the site. The conclusions given in this Report are based on information gathered at the specific test locations and can only be extrapolated to an undefined limited area around those locations. The extent

of the limited area depends on the properties of the materials adjacent and local conditions, together with the position of any current structures and underground utilities and facilities, and natural and other activities on site. In addition, chemical analysis was carried out for a limited number of parameters (as stipulated in the scope agreed between the Client and RSK, based on an understanding of the available operational and historical information) and it should not be inferred that other chemical species (not tested) are not present.

2.2 The comments given in this Report and the opinions expressed are based on the ground conditions encountered during the site work and on the results of tests made in the field and in the laboratory. The extent of the exploratory holes, laboratory testing and monitoring undertaken may have been restricted due to a number of factors including accessibility, the presence of buried or overhead services, current development, site usage, timescales or the Client's specification. The exploratory holes only assess a small proportion of the site area with respect to the site as a whole, and as such may only provide an indicative assessment of ground conditions on site. There may be conditions pertaining to the site that have not been disclosed by the investigation and therefore could not be taken into account. In particular, it should be noted that there may be areas of made ground not detected due to the limited nature of the investigation or the thickness and quality of made ground across the site may be variable. In addition, groundwater levels and ground gas concentrations and flows, may vary from those reported due to seasonal, or other, effects and the limitations stated in the data should be recognised. The presence of hotspots of undisclosed contamination or exceptional and unforeseen ground conditions cannot be discounted.

2.3 Where the Services include Investigation of an exploratory nature or relating to physical ground works, any costings and prices provided in the Report are estimated and provided for guidance purposes only. The actual cost and time quantities shall be remeasured and shall be dependent upon the ground or other conditions, constraints present, and number and depth of the investigation locations, which shall influence the number of samples and tests required, and the quantities of soil being classified.

2.4 Asbestos is often observed to be present in soils in discrete areas. Whilst asbestos-containing materials may have been locally encountered during the fieldworks or supporting laboratory analysis, the history of brownfield and demolition sites indicates that asbestos fibres may be present more widely in soils and aggregates, which could be encountered during more extensive ground works. However, this Report does not constitute an asbestos survey. On this basis, the presence of asbestos on site cannot be discounted and a full asbestos survey should be undertaken.

2.5 Unless stated otherwise, only preliminary geotechnical recommendations are presented in this Report and these should be verified in a Geotechnical Design Report, once proposed construction and structural design proposals are confirmed. Eurocode 7 gives guidance on the type of sampling, sample quality, number and spacing of intrusive investigations, and number of laboratory tests required. It is intended that the Geotechnical Information section of this Report will fulfil the general requirements of the Ground Investigation Report as set out in section 6 of Eurocode7, although this is subject to the restrictions imposed on the investigation, as listed above. For geotechnical design, Eurocode 7 requires the Geotechnical Design Report to address both the geotechnical and structural aspects of the geotechnical design for both the limit and serviceability states. The Geotechnical Appraisal section of this Report will not meet the requirements of a Geotechnical Design Report (GDR) and should therefore be used for preliminary guidance only.

3. Service Constraints where the Report relates to Surface Water Management:

3.1 The Surface Water Management Inspection (SWMI) Report, documents provided, observations, actions, and recommendations, with respect to the management of potential pollution issues to surface waters, made during the site Inspection visit, are those present at the time of the visit, and may not represent those recorded by others on the same day.

3.2 The comments given in this Report and the opinions expressed are based on the weather, ground and ground water conditions encountered during the site work and on the results of tests made in the field and in the laboratory. However, there may be conditions pertaining to the site that have not been disclosed by the inspection and therefore could not be taken into account. In addition, groundwater levels and flows, may vary from those Reported due to seasonal, or other, effects and the limitations stated in the data should be recognised.

3.3 RSK places a degree of dependence upon oral information provided by site representatives, which is not readily verifiable through visual inspection, or supported by any available written documentation. RSK shall not be held responsible for conditions or consequences arising from relevant facts that were not fully disclosed by facility or site representatives at the time this Report was prepared.

3.4 This Report is a live document, to be continually reviewed and updated as the development progresses or other changes occur on site. RSK can only maintain the currency of this Report through the Client requesting support with supplementary site visits or attendance at meetings ahead of key stages of the development in relation to surface water management. Our risk rating assesses a number of risk factors in line with the source-pathway- receptor model and is therefore subject to constant change.

3.5 Standard design drawings are indicative. Material types, dimensions and construction details will need to be adjusted by the Client to suit the specific conditions / flows on Site.

3.6 The full responsibility for implementing the site-specific protection and maintenance measures to protect the surface water system as stated in this Report, remains with the Client and their site management team. Additional control measures may be required to achieve the objectives set out in the Surface Water Management Plan to be implemented and financed by the Client.

4. Service Constraints where the Report relates to Waste Management:

4.1 In accordance with the definition provided in the Waste Framework Directive (WFD), materials are only considered waste if 'they are discarded, intended to be discarded or required to be discarded, by the holder'. Naturally occurring soils are not considered waste if re-used on the site of origin for the purposes of development. Soils such as made ground that are not of clean and natural origin (irrespective of whether they are contaminated or not) and other materials such as recycled aggregate, do not necessarily become waste until the criteria above are met. Excavation arisings from the development may therefore be classified as waste if surplus to requirements and/or unsuitable for re-use.

4.2 It is the duty of the waste producer, to ensure that all waste is accurately classified prior to waste disposal. Technical Guidance WM3 (EA, 2018) sets out in its Appendix D requirements for waste sampling. It is a legal requirement to correctly assess and classify waste. The level of sampling should be proportionate to the volume of waste and its heterogeneity. Unless otherwise stated, the waste assessment presented in this Report should be considered as preliminary and further testing and assessment of the waste under the provisions of a Waste Sampling Plan may be required to obtain the necessary level of data required for basic characterisation of the waste in support of disposal.

4.3 Unless stated otherwise in the Report, information relating to historical operations at the site was not reviewed as part of the assessment by RSK. In addition, unless otherwise stated in the Services, RSK was not present during the collection of the samples nor had any input on the chemical testing suite. Therefore, the waste assessment and classification detailed in this Report are based solely on any information that were provided to RSK (e.g., laboratory chemical data, exploratory hole records) and were completed without prejudice for our Client.

4.4 RSK's assumes that any ground investigation data, chemical testing results etc., that were provided by the Client to inform the waste assessment and supporting review were carried out in accordance with current best practice and relevant guidance/ standards, where applicable. Thus, the

comments given in this Report and the opinions expressed are based solely on the information provided by the Client. However, it is noted that there may be conditions pertaining to the site that have not been disclosed by the investigation and therefore could not be taken into account as part of the RSK assessment.

5. Service Constraints for Construction Environmental Management Plan Reports:

5.1 This Report should be considered in the light of any changes in legislation, statutory requirement or industry practices that may have occurred subsequent to the date of issue.

5.2 The measures and comments outlined in this Report and any opinions expressed are based on the plans provided at the time and discussions with relevant parties. However, there may be conditions pertaining to the site that have not been disclosed by investigations and therefore could not be taken into account.

5.3 This CEMP is a live document and is subject to change throughout the project, as and when necessary, to ensure management of environmental aspects remains relevant, and to ensure continued compliance with legislation and commitments as they may change. RSK understands that this CEMP will be reviewed by the Client every six months and updated as and when necessary.

5.4 It is the full responsibility of the Principal Contractor/ Client to ensure that their works do not contravene legal requirements, and adherence to this CEMP alone cannot be a full defence regarding legal action against the Principal Contractor.

6. Service Constraints where the Report relates to Ground Gas Membrane Verification:

6.1 This Report is limited to the verification of the gas resistant membrane/vapour membrane/radon barrier after installation and no inspections were undertaken of the substrate (i.e. prepared ground). The Report therefore does not constitute as a full verification of ground gas protection system.

6.2 The comments given in this Report and the opinions expressed, are based on the condition of the ground gas membrane as encountered at the time of inspection by suitably qualified personnel. RSK cannot accept liability for any subsequent change to the status of the gas membrane by follow-on trades or other construction activity.

6.3 Where not designed by RSK, the verification of protection measures is carried out with reference to the gas protection design provided by the Client. RSK assume the scope of gas protection measures as determined by third parties to be correct and to have achieved any required approval from authorities.

6.4 The Ground Gas Design Report/Remediation Strategy and Verification Plan contains details of the procedures to be adopted for inspection and validation of the works. However, it should be noted that responsibility for the correct implementation of the strategy lies with the appointed contractor. RSK cannot be held responsible for any remedial works that are carried out without the agreed procedures involving either direct supervision by RSK, or inspection and validation of the works by a representative from RSK.

7. Service Constraints for Environmental Due Diligence (EDD) Reports:

7.1 The comments given in this Report and the opinions expressed are based on the information obtained and reviewed as part of the desk-based assessment. However, there may be conditions pertaining to the Site that have not been disclosed by the assessment and therefore could not be taken into account. Furthermore, no intrusive investigations, monitoring or sampling have been undertaken to confirm the environmental status of the site, therefore any comments relating to ground conditions and subsurface contamination are based solely on a review of desk-based information.

7.2 This Report describes the results of the EDD exercise. The scope of this EDD Report, where appropriate, covers legal or regulatory compliance with respect to UK or international regulations associated with environmental matters.

7.3 As with any EDD exercise, there is a certain degree of dependence upon information provided by the target company. The EDD does not include a site walkover / visit or liaison with site representatives unless identified in the Services. Therefore, the assessment is based on the available desk study information. Also, there is a certain degree of dependence upon oral information provided by site representatives, which is not readily verifiable through visual inspection, or supported by any available written documentation. RSK shall not be held responsible for conditions or consequences arising from relevant facts that were not fully disclosed by facility or site representatives at the time this EDD exercise was performed.

7.4 This Report, including all supporting data and notes (collectively referred to hereinafter as "information"), was prepared or collected by RSK for the benefit of its Client.

7.5 The comments given in this Report and the opinions expressed are based on the information obtained and reviewed as part of the desk-based assessment and the site inspection visit. However, there may be conditions pertaining to the Site that have not been disclosed by the assessment and therefore could not be taken into account. Furthermore, no intrusive investigations, monitoring or sampling have been undertaken to confirm the environmental status of the Site therefore any comments relating to ground conditions and subsurface contamination are based solely on a review of desk-based information and observations collected during the site inspection visit.

8. Service Constraints for Ground source heat energy Reports:

8.1 It is understood that this is a desktop survey only and that there are no requirements for a site walkover, service utility survey, or provision of service plans. These services can be provided upon request if required.

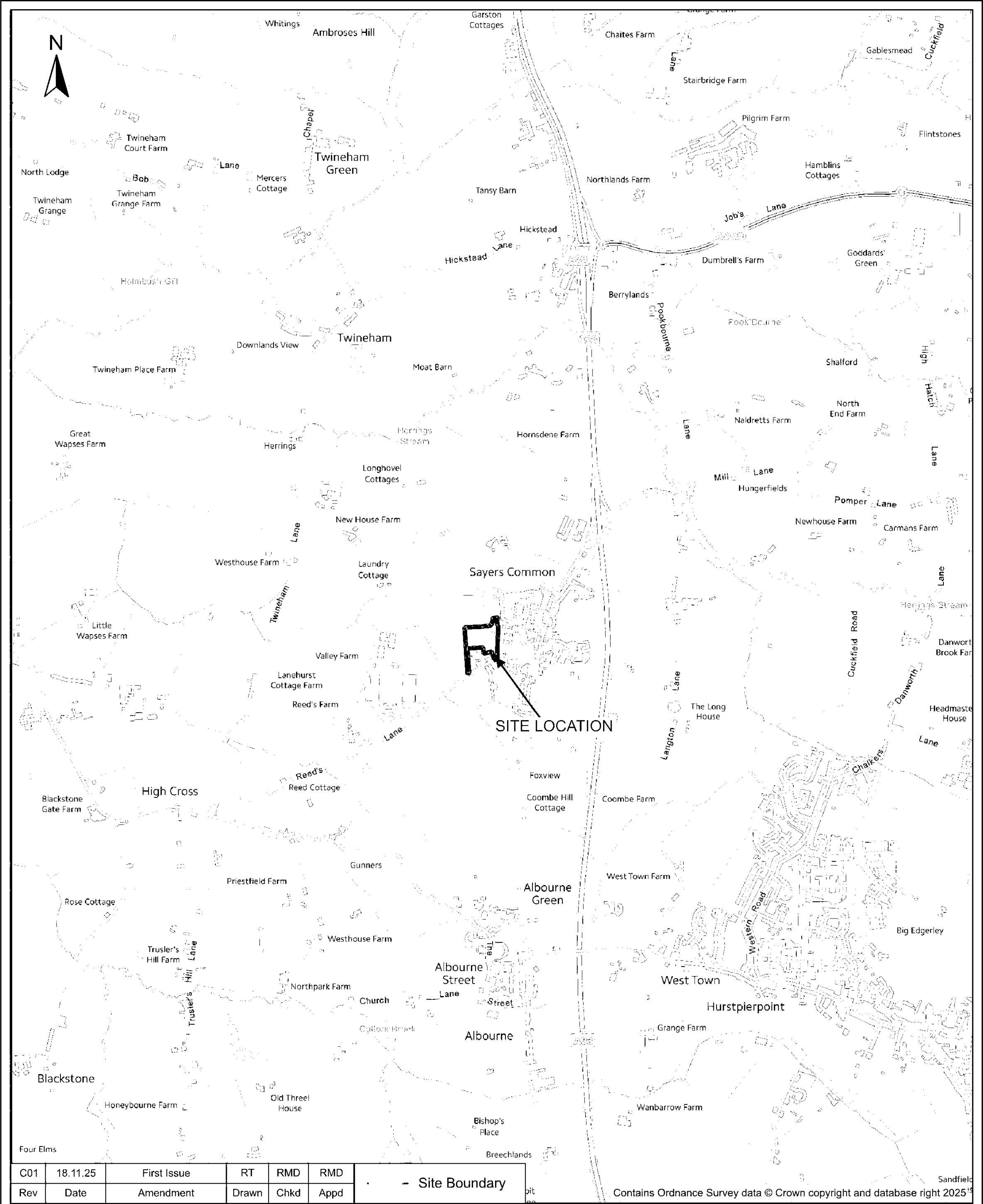
8.2 At a later stage, it is possible that a thermal response test (TRT) will need to be completed, for which a test borehole will have to be drilled, and these would be costed at the time. RSK can provide all aspects of subsequent site work for a GSHP system if required.

9. Service Constraints for Water Abstraction Borehole Reports:

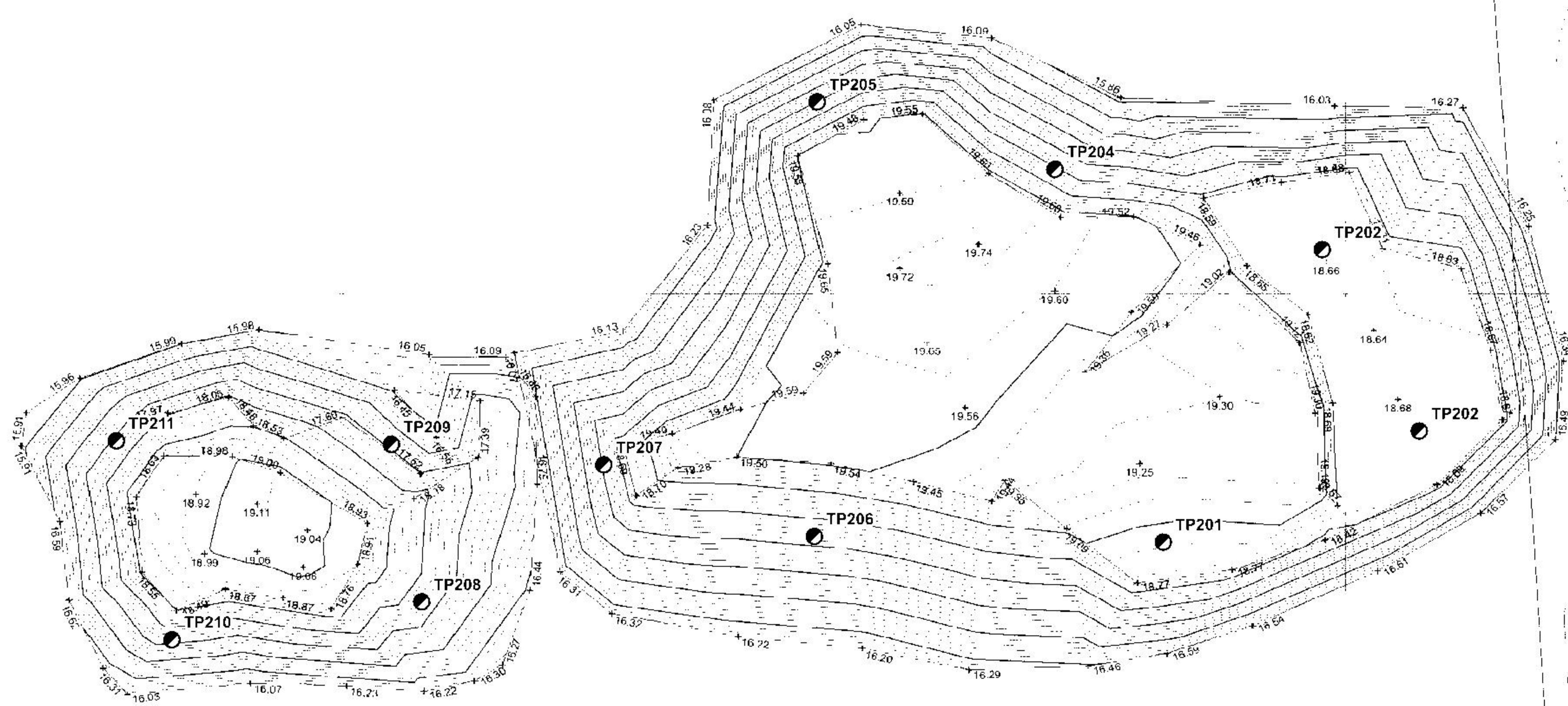
9.1 The Report aims principally to only identify and assess the suitability of the site for a water abstraction borehole. This Report should be considered in the light of any changes in legislation, statutory requirements, and industry practices, that have occurred subsequent to the date of the Report.

9.2 Unless stated in the Report, the opinions expressed in this Report including all comments and recommendations provided are on the basis of the information obtained from a desk-based assessment.

APPENDIX B – FIGURES AND DRAWINGS



Client			
Elivia Homes Ltd			
Project Name			
Furze Field, Sayers Common			
Description			
Site Location Plan			
Project ID	Drawing no	Rev	File name
3751022	11101	C01	3751022-LW-111-XX-D-G-11101-C01



LEGEND

 Sample Location

Notes:
Base plan provided by the client.
Drawing Ref: ELI0005 01 'Subsoil and Topsoil Stockpile'

C01	12.12.25	First Issue	RT	LS	LS
Rev	Date	Amendment	Drawn	Chkd	Appd

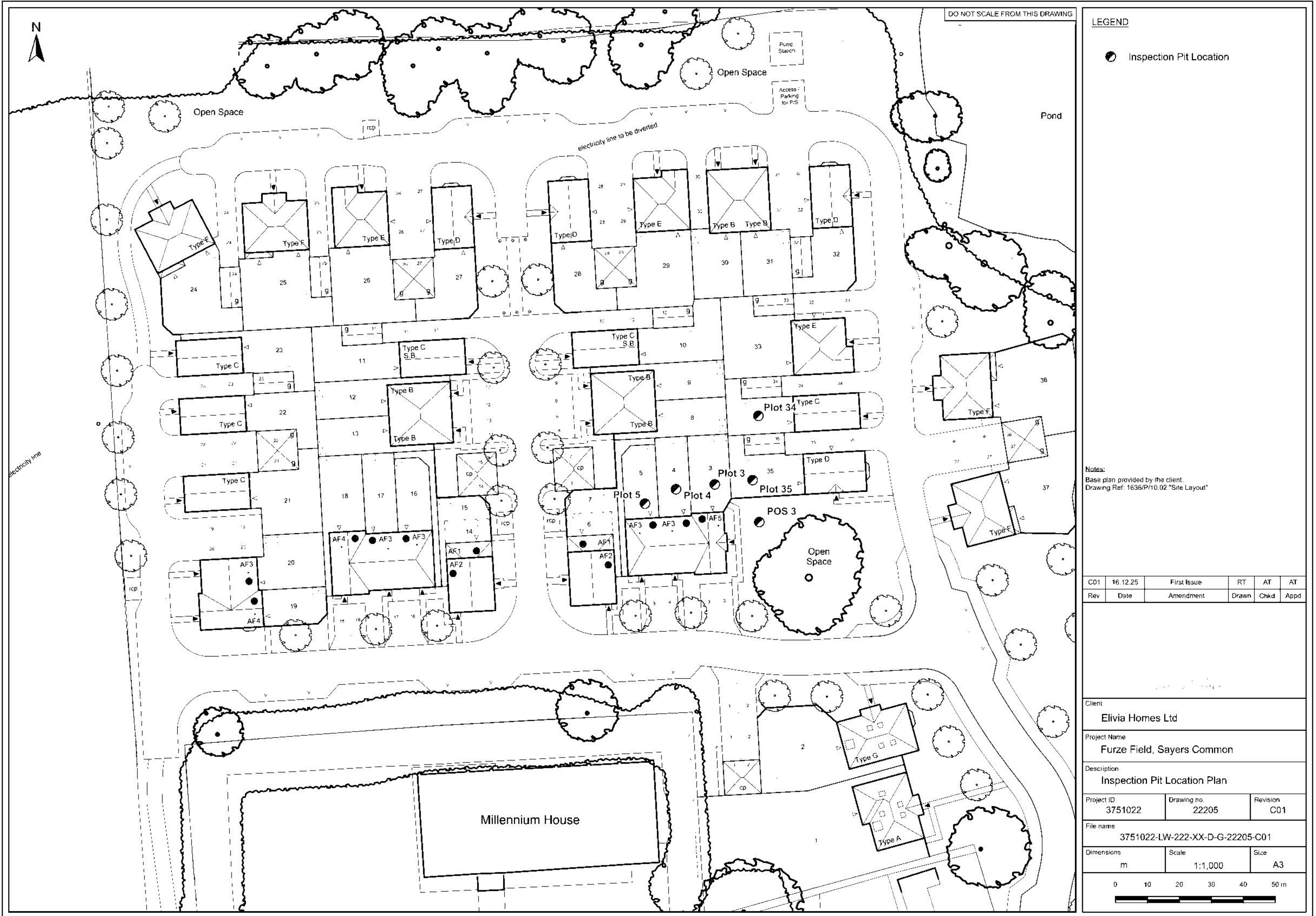
Client	Elivia Homes Ltd
Project Name	Furze Field, Sayers Common

Project ID 3751022	Drawing no. 22203	Revision C01
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File name	3751022-IW-222-XX-D-G-22203-C01
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Dimensions	Scale	Size
m	1:300	A3





LEGEND

● Inspection Pit Location

Notes:
Base plan provided by the client.
Drawing Ref: 1636/P/10.02 "Site Layout"

Rev	Date	Amendment	Drawn	Chkd	Appd
C01	16.12.25	First Issue	RT	AT	AT

Client
Elivia Homes Ltd

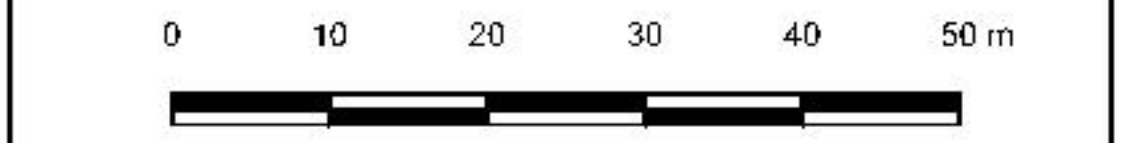
Project Name
Furze Field, Sayers Common

Description
Inspection Pit Location Plan

Project ID 3751022	Drawing no. 22205	Revision C01
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File name
3751022-LW-222-XX-D-G-22205-C01

Dimensions m	Scale 1:1,000	Size A3
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APPENDIX C – SITE PHOTOGRAPHS



Plate 1 – Overview of topsoil stockpile TSP1 (Dated 05.11.2025)



Plate 2 – Sampling of topsoil stockpile TSP1 (Dated 05.11.2025)



Plate 3 – Overview of topsoil stockpile TSP1 (Dated 05.11.2025)



Plate 4 – Sampling of topsoil stockpile TSP1 (Dated 05.11.2025)



Plate 5 - Overview of subsoil stockpile SSP1 (Dated 21.11.2025)



Plate 6 - Overview of subsoil stockpile SSP1 after additional subsoil placed (Dated 21.11.2025)



Plate 7 – Overview of rear private garden for Plot 35 (Dated 21.11.2025)



Plate 8 – Overview of Plot 35 inspection pit (Dated 21.11.2025)



Plate 9 – Plot 35 rear garden clean cover thickness recorded as 700mm (Dated 21.11.2025)

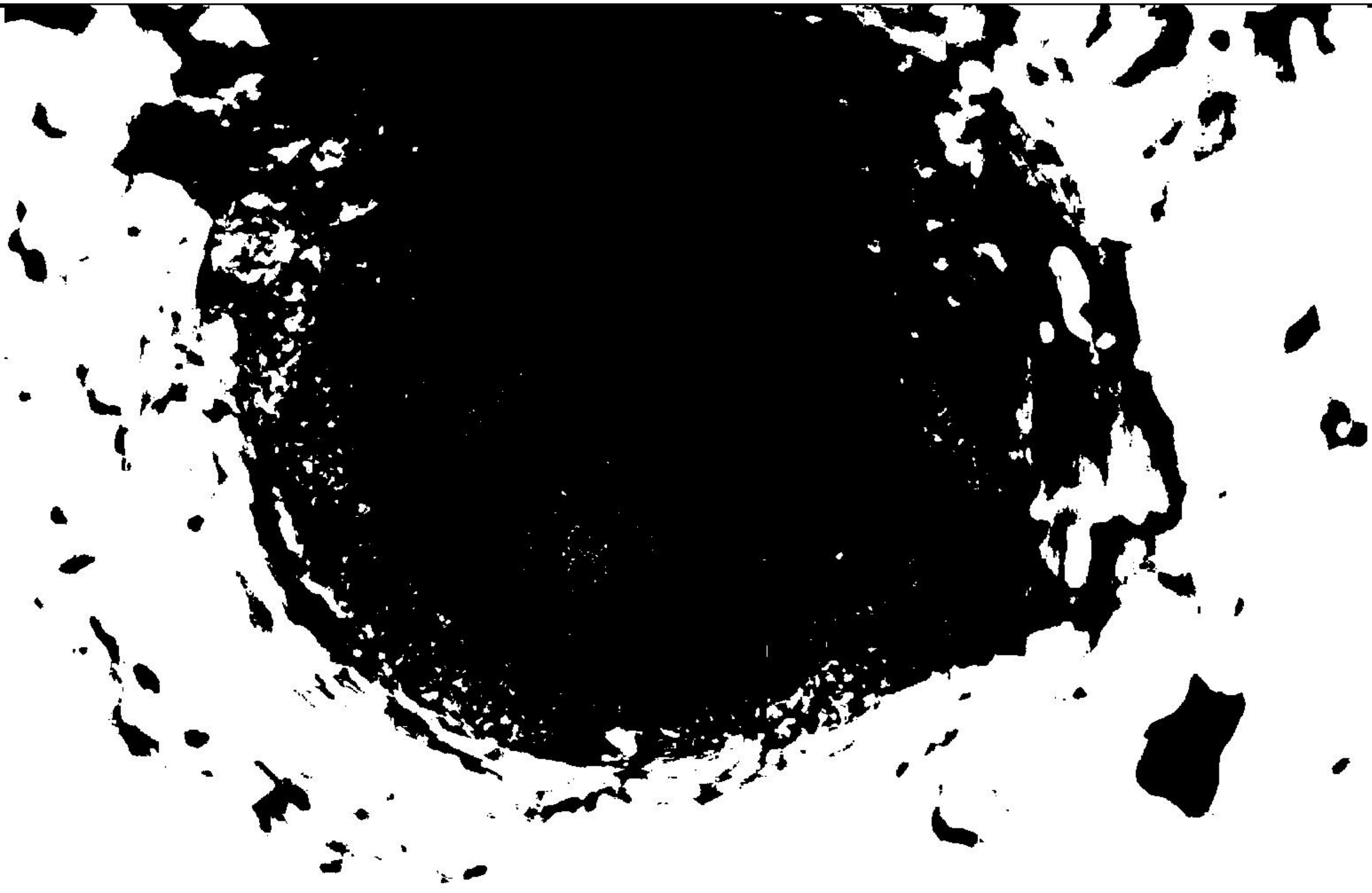


Plate 10 – Overview of Plot 35 rear garden inspection pit showing geotextile membrane at the base of the pit (Dated 21.11.2025)



Plate 11 – Overview of topsoil being placed in Plots 3, 4, and 5 (Dated 03.12.2025)



Plate 12 – Overview of Plots 3, 4, and 5 (Dated 03.12.2025)