Our Reference: 4046-G-L045 Rev A

Date: 29th June 2026

Mr Matt Davis
Engineering Manager
Story Homes
Story House, Lords Way,
Kingmoor Business Park,
Carlisle,
CA6 4SL

iD GeoEnvironmental Limited

Head Office
Dane Mill Business Centre,
Broadhurst Lane,
Congleton,
Cheshire,
CW12 1LA
t: 01565 755557
www.id-geo.co.uk

Dear Mr Davis,

Land to the West of Valley View Road, Whitehaven - Delineation of ACM and Remediation Options Appraisal

We are pleased to present the findings of our investigation to assess the significance of ACM fragments identified during site preparatory works. The works were undertaken in accordance with the Hotspot Protocol presented in Section 10.2 (Contingency for Previously Unidentified Contamination) of the following approved document:

- Remediation Strategy for Phase 5, 6 and School Land at Edgehill Park, Whitehaven reference 4046-G-R022 Rev B dated January 2026.

It is understood that the above report has been submitted and approved in accordance with Planning Permission. Ref. 4/26/2089/DOC.

Background
On 26th May 2026 during excavation to install dranage near plots 98, 99 and 130, which included part of the former site haul road, fragments of corrugated cement sheet which were considered likely to contain asbestos fibres (ACM), were locally observed in the eastern base of the haul road embankment. The location of the excavation is depicted on Drawing 4046-G-D097 in Appendix A. All excavation work was therefore suspended until further investigation could be undertaken to assess the significance of the suspected ACM. IDG provided Cumberland Council on the 26th May 2026 with a detailed email description of our findings and proposed action to investigate, delineate and excavate the suspected ACM. Cumberland Council Public Health and Protection confirmed these proposed actions were satisfactory on 27th May 2026.

Initial Investigation, Delineation & Investigation
Approximately 250m^3 of made ground containing suspected ACM and dark brown sandy gravel (soil matrix) was removed and placed upon visqueen sheeting and covered with visqueen prior to receipt of chemical laboratory results and offsite disposal. Six samples were obtained from the vicinity of the investigation: one sample HRS1 comprised a sample of ACM for bulk asbestos analysis and samples HRS2-HRS6 were obtained at approximately 5m centre radius from the ACM location which were submitted for laboratory asbestos screening to establish whether asbestos fibres were present within the soil matrix. Sample locations are depicted on drawing 4046-G-D0097 in Appendix A.

It was noted that samples HRS2 & HRS3 obtained from the west of the haul road principally comprised light grey sandy gravel of brick, concrete and limestone aggregate (6F2 type material) whereas samples HRS4, HRS5 & HRS6 obtained from beneath the eastern base of the haul road contained dark brown slightly clayey gravelly silty sand with brick and concrete cobbles (Granular Made Ground). The Granular Made Ground east of the haul road is overlain by a thin ~100m thick layer of reworked natural clay.

It was concluded that clean 6F2 material had been placed over the remains of a larger historical stockpile of made ground which formerly extended eastwards across a zone historically used (by Marchon during the late 20th Century) for Phosphorite Storage. Investigation coupled with high frequency chemical testing of this larger stockpile during 2022 to inform waste assessment and offsite disposal (letter report 4046-G-L024 dated 16th August 2022) identified elevated PAH's with significant pH and sulphate concentrations due to the presence of concrete and anhydrite. However, no evidence of asbestos fibres was detected. The majority of the larger stockpile was removed from site during 2023, although it is apparent from recent excavations that a thin layer remains east of the haul road. It is understood that Story Homes retain waste transfer records relating to the larger stockpiles disposal.

Laboratory results dated 19th June 2026 presented in Appendix B confirm that the suspected ACM (fragment of cement bonded sheet) contains chrysotile asbestos fibres. In addition, soil matrix samples HRS4, HRS5 & HRS6 contain loose amosite and anthophyllite fibres. Quantification testing has been scheduled and results are awaited. However, results to date indicate that asbestos fibre contamination is present within Granular Made Ground beneath the east of the haul road and further delineation, excavation and an appropriate remediation strategy will be required to protect site workers, local residents and ultimately, end users of the site.

Other than a marginally elevated concentration of dibenzo(ah)anthracene, no other significant concentrations of metal or PAH contamination were detected.

Current Risk to Site Workers and Local Residents

The surface and western half of the haul road comprise crushed concrete (6F2) placed during current site works. Testing indicates this does not contain any ACM or asbestos fibres and consequently dust generated by traffic which until recently used this haul road is not anticipated to have contained any fibres.

Dark brown slightly clayey gravelly silty sand (Granular Made Ground) proven beneath 6F2 in the east of the former haul road contains asbestos fibres and is not suitable to remain beneath proposed gardens. The majority of this material is not currently exposed to the elements and is not being tracked over; the current risk of mobilisation of asbestos fibres is therefore negligible. Further sampling to assess fibre concentrations within the Granular Made Ground deposit was undertaken on 22nd June 2026. Results are awaited.

At this stage it is estimated that approximately 800m^3 of potentially contaminated Granular Made Ground remains which it will be necessary to remediate. The contaminated Granular Made Ground is located beneath relatively clean 6F2 material or a thin layer of reworked clay and consequently the current risk to site workers and local residents from dust is extremely low.

Remediation Options

At this stage there are two potential remediation options to mitigate against future risks of exposure to airborne fibres:

- Delineation, excavation and offsite disposal
- Delineation, excavation and placement beneath hardstanding or highway or beneath a minimum of 600mm of clean soil cover in POS.

Delineation and offsite disposal provides a rapid and effective solution. However, based upon the volume of material it will be necessary to excavate the cost is likely to be excessive. Furthermore, transportation will result in a significant number of vehicle movements (estimated ~90), with potential to release dust to adjacent environments.

Quantification results are awaited, although these may not demonstrate that the Granular Made Ground contains <0.001% fibres by volume which (subject to the removal of visible ACM) will enable retention beneath onsite highways or hardstanding (Table 4.1, Remediation Strategy 4046-G-R022 Rev B).

Proposed Remediation Strategy

The current development has permission to remodel and landscape an anhydrite stockpile in the southwest of the site. The coarse anhydrite sandy gravel and cobbles are to be permanently retained beneath a geotextile layer and 450mm of clean clay cover and topsoil forming an engineered layer designed to prevent surface water ingress and potential for both gypsification of the anhydrite and leachable contamination migration.

The landscaped anhydrite is designed to remain undisturbed in perpetuity and will be maintained and managed by a site management company with legal restrictions registered against the land title to prevent future excavation or disturbance of the encapsulated material. These restrictions will be binding upon any future landowners.

Given that the anhydrite stockpile is intended to remain undisturbed for perpetuity, it is concluded that the most appropriate remediation option would be to place the asbestos fibre contaminated Granular Made Ground within/beneath the anhydrite and the protective engineered clean cover soils. This represents a significantly safer long-term option than isolation beneath highways or hardstanding as it will be permanently isolated from end users or future maintenance workers. Relocation to within the landscaping would also minimise vehicle movements and risk of dust generation which would be anticipated as a consequence of offsite disposal.

Regulations

Excavation, delineation and movement of the Granular Made Ground should be undertaken in accordance with the CL:AIRE/JIWG CARSOIL Control of Asbestos Regulations 2012. It is noted that mobilisation of fibres may be minimised by soil dampening: mist cannons and water spraying during all soil exposure and soil movements will be required. Site operatives will require P3 masks and appropriate PPE during excavation and replacement. The contractor shall provide a method statement describing the measures necessary to excavate and move the contaminated Granular Made Ground whilst minimising risks to site workers and local residents.

Verification

Verification of the movement of the contaminated Granular Made Ground shall be presented in the final Verification Report. Verification will be in accordance with the protocols stated in Section 11 of the Remediation Strategy ref: 4046-G-R022 Rev B.

MMP

Material movements shall be carried out in accordance with the CL:AIRE DoWCoP. Consequently the current MMP will require updating and a new declaration subject to the written approval of the LPA (and Environment Agency if contacted by the LPA) to the above proposals.

We trust that our findings and proposed remediation action is satisfactory for Cumberland Council Planning Authority.

Yours faithfully,

Nick Ward BSc (Hons), FGS.
for and on behalf of
iD GEOENVIRONMENTAL LIMITED

Enclosed:
Appendix A: Drawing No. 4046-G-D097
Appendix B: Laboratory Results

Appendix A

KEY

- P6 Site Boundary
- Former Phosphorite Storage Area
- Haul Road Drain Excavation
- HRS — Haul Road Sample Pit 2026
- TP1100 — IDG Trial Pit 2022
- WS — IDG Window Sample 2025
- PH300 — IDG Probehole 2016
- TP700 — IDG Trial Pit 2020
- TP — Integra Trial Pit (2009-11)

Revision	Description	Date

iD GeoEnvironmental Limited

North West & Midlands:
Caledonian House
Tatton Street
Knutsford, Cheshire
WA16 6AG
Tel: 01565 755557
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North East & Yorkshire:
The Stables, Aske Hall
Aske, Richmond
Yorkshire, DL10 5HG
Tel: 01748 889015
Fax: 01565 740263

CLIENT: Story Homes

JOB TITLE: Phase 3B, Edgehill Park

DRAWING TITLE: Haul Road ACM Sampling

STATUS: FINAL

DRAWN BY	SIGNATURE	DATE
NW		25-6-26
APPROVED	SIGNATURE	DATE
LM		25-6-26

SCALE: 1:250@A2

DRG No.: 4046-G-D097

A2 border: 460 X 392

Appendix B

envirolab
Hattersley Science & Technology Park
Stockport Road, Hattersley, SK14 3QU

FINAL ANALYTICAL TEST REPORT

Envirolab Job Number: 26/06938
Issue Number: 1 **Date:** 19 June, 2026

Client: iD GeoEnvironmental Ltd (Congleton)
Dane Mill Business Centre
Broadhurst Lane
Congleton
CW12 1LA

Project Manager: Nick Ward
Project Name: Edgehill Park, Whitehaven
Project Ref: 4046
Order No: N/A
Date Samples Received: 04/06/26
Date Instructions Received: 05/06/26
Date Analysis Completed: 19/06/26

Approved by:

Gemma Berrisford
Deputy Client Services Supervisor

Envirolab Job Number: 26/06938

Client Project Name: Edgehill Park, Whitehaven

Client Project Ref: 4046

Lab Sample ID	26/06938/1	26/06938/2	26/06938/3	26/06938/4	26/06938/5	26/06938/6		Units	Limit of Detection	Method ref
Client Sample No										
Client Sample ID	HRS1	HRS2	HRS3	HRS4	HRS5	HRS6				
Depth to Top	1.50	1.50	1.50	1.50	1.50	1.50				
Depth To Bottom										
Date Sampled	29-May-26	29-May-26	29-May-26	29-May-26	29-May-26	29-May-26				
Sample Type	SOLID - BULK	SOIL	SOIL	SOIL	SOIL	SOIL				
Sample Matrix Code	8	4AE	4AE	4AE	4A	4AE				
% Stones >10mm$_A$	-	23.8	12.8	<0.1	<0.1	<0.1		% w/w	0.1	A-T-044
pH$_D$$^{M\#}$	-	7.92	8.84	8.93	8.91	8.85		pH	0.01	A-T-031s
Total Organic Carbon$_D$$^{M\#}$	-	5.55	-	7.47	-	1.59		% w/w	0.08	A-T-032s
Arsenic$_D$$^{M\#}$	-	18	-	16	-	7		mg/kg	1	A-T-024s
Cadmium$_D$$^{M\#}$	-	<1.0	-	<1.0	-	<1.0		mg/kg	1	A-T-024s
Copper$_D$$^{M\#}$	-	24	-	45	-	15		mg/kg	1	A-T-024s
Chromium$_D$$^{M\#}$	-	14	-	17	-	11		mg/kg	1	A-T-024s
Lead$_D$$^{M\#}$	-	38	-	37	-	14		mg/kg	1	A-T-024s
Mercury$_D$	-	<0.17	-	<0.17	-	<0.17		mg/kg	0.17	A-T-024s
Nickel$_D$$^{M\#}$	-	24	-	32	-	12		mg/kg	1	A-T-024s
Selenium$_D$$^{M\#}$	-	4	-	2	-	<1		mg/kg	1	A-T-024s
Zinc$_D$$^{M\#}$	-	52	-	60	-	29		mg/kg	1	A-T-024s

Envirolab Job Number: 26/06938

Client Project Name: Edgehill Park, Whitehaven

Client Project Ref: 4046

Lab Sample ID	26/06938/1	26/06938/2	26/06938/3	26/06938/4	26/06938/5	26/06938/6		Units	Limit of Detection	Method ref
Client Sample No										
Client Sample ID	HRS1	HRS2	HRS3	HRS4	HRS5	HRS6				
Depth to Top	1.50	1.50	1.50	1.50	1.50	1.50				
Depth To Bottom										
Date Sampled	29-May-26	29-May-26	29-May-26	29-May-26	29-May-26	29-May-26				
Sample Type	SOLID - BULK	SOIL	SOIL	SOIL	SOIL	SOIL				
Sample Matrix Code	8	4AE	4AE	4AE	4A	4AE				
Asbestos in Soil (inc. matrix)										
Asbestos in soil$_{D}^{\#}$	-	NAD	NAD	Anthophyllite	Amosite	Amosite				A-T-045
Asbestos Matrix (visual)$_{D}$	-	-	-	-	-	-				A-T-045
Asbestos Matrix (microscope)$_{D}$	-	-	-	Loose Fibres	Loose Fibres	Loose Fibres				A-T-045
Asbestos ACM - Suitable for Water Absorption Test?$_{D}$	-	N/A	N/A	N/A	N/A	N/A				A-T-045
Bulk Fibre ID (inc. matrix)										
Bulk Fibre Identification$_{D}^{\#}$	Chrysotile	-	-	-	-	-				A-T-045
Bulk Fibre Identification Matrix (visual)$_{D}$	Cement	-	-	-	-	-				A-T-045
Bulk Fibre Identification - Suitable for Water Absorption Test?$_{D}$	Yes	-	-	-	-	-				A-T-045

Envirolab Job Number: 26/06938

Client Project Name: Edgehill Park, Whitehaven

Client Project Ref: 4046

Lab Sample ID	26/06938/1	26/06938/2	26/06938/3	26/06938/4	26/06938/5	26/06938/6		Units	Limit of Detection	Method ref
Client Sample No										
Client Sample ID	HRS1	HRS2	HRS3	HRS4	HRS5	HRS6				
Depth to Top	1.50	1.50	1.50	1.50	1.50	1.50				
Depth To Bottom										
Date Sampled	29-May-26	29-May-26	29-May-26	29-May-26	29-May-26	29-May-26				
Sample Type	SOLID - BULK	SOIL	SOIL	SOIL	SOIL	SOIL				
Sample Matrix Code	8	4AE	4AE	4AE	4A	4AE				
PAH-16MS										
Acenaphthene$_A^{M\#}$	-	0.04	-	0.16	-	0.06		mg/kg	0.01	A-T-019s
Acenaphthylene$_A^{M\#}$	-	0.03	-	0.02	-	<0.01		mg/kg	0.01	A-T-019s
Anthracene$_A^{M\#}$	-	0.17	-	0.43	-	0.14		mg/kg	0.02	A-T-019s
Benzo(a)anthracene$_A^{M\#}$	-	0.75	-	2.00	-	0.63		mg/kg	0.04	A-T-019s
Benzo(a)pyrene$_A^{M\#}$	-	0.61	-	1.62	-	0.48		mg/kg	0.04	A-T-019s
Benzo(b)fluoranthene$_A^{M\#}$	-	0.78	-	1.92	-	0.61		mg/kg	0.05	A-T-019s
Benzo(ghi)perylene$_A^{M\#}$	-	0.37^U	-	1.09^U	-	0.31^U		mg/kg	0.05	A-T-019s
Benzo(k)fluoranthene$_A^{M\#}$	-	0.33	-	0.82	-	0.24		mg/kg	0.07	A-T-019s
Chrysene$_A^{M\#}$	-	0.78	-	1.98	-	0.66		mg/kg	0.06	A-T-019s
Dibenzo(ah)anthracene$_A^{M\#}$	-	0.09	-	0.31	-	0.07		mg/kg	0.04	A-T-019s
Fluoranthene$_A^{M\#}$	-	1.52	-	4.10	-	1.38		mg/kg	0.08	A-T-019s
Fluorene$_A^{M\#}$	-	0.08	-	0.17	-	0.07		mg/kg	0.01	A-T-019s
Indeno(123-cd)pyrene$_A^{M\#}$	-	0.37	-	0.97	-	0.32		mg/kg	0.03	A-T-019s
Naphthalene $_A^{M\#}$	-	0.06	-	0.16	-	<0.03		mg/kg	0.03	A-T-019s
Phenanthrene$_A^{M\#}$	-	0.78	-	1.90	-	0.59		mg/kg	0.03	A-T-019s
Pyrene$_A^{M\#}$	-	1.21	-	3.50	-	1.18		mg/kg	0.07	A-T-019s
Total PAH-16MS$_A^{M\#}$	-	7.97	-	21.1	-	6.74		mg/kg	0.01	A-T-019s

Report Notes

General

•This report shall not be reproduced, except in full, without written approval from Envirolab.
•The client Sample No, Client Sample ID, Depth to top, Depth to Bottom and Date Sampled are all provided by the client and can affect the validity of results.
•The results reported herein relate only to the material supplied to the laboratory.
•The residue of any samples contained within this report, and any received within the same delivery, will be disposed of **four weeks** after the initial scheduling. For samples tested for Asbestos we will retain a portion of the dried sample for a minimum of **six months** after the initial Asbestos testing is completed.
•Analytical results reflect the quality of the sample at the time of analysis only.
•Opinions and Interpretations expressed are outside our scope of accreditation.
•A deviating sample report is appended and will indicate if samples or tests have been found to be deviating. Any test results affected may not be an accurate record of the concentration at the time of sampling and, as a result, may be invalid.
•If a sample is outside of the calibration range or affected by interferences then it may need diluting. This will result in the limit of detection (LOD) being raised.
•Subcontracted Analysis: Please see the appended report for any deviations, current LODs and accreditation status of the test.

Key

Superscript "#"	Accredited to ISO 17025
Superscript "M"	Accredited to MCertS
Superscript "U"	Individual result not accredited
None of the above symbols	Analysis unaccredited
Subscript "A"	Analysis performed on as-received Sample
Subscript "D"	Analysis performed on the dried sample, crushed to pass 2mm sieve.
Subscript "D" on Asbestos	Analysis performed on a dried aliquot of sample provided.
Subscript "^"	Analysis has dependant options against results. Details appear in the comments of your Sample receipt
Subscript "@"	Result is an opinion
IS	Insufficient Sample for analysis
US	Unsuitable Sample for analysis
NDP	No Determination Possible
NAD	No Asbestos Detected
Trace	Asbestos found not suitable for Gravimetric Quantification – not enough to accurately weigh.
N/A	Not applicable

Asbestos

Identification: Asbestos in soil analysis is performed on a dried aliquot of the submitted sample and cannot guarantee to identify asbestos if only present in small numbers as discrete fibres/fragments in the original sample.
Stones etc. are not removed from the sample prior to analysis
"Trace Asbestos Identified" will be reported if there is not enough present to verify the type.

Assigned Matrix Codes

1	SAND	6	CLAY/LOAM	A	Contains Stones
2	LOAM	7	OTHER	B	Contains Construction Rubble
3	CLAY	8	Asbestos Bulk (Only Asbestos ID accredited)	C	Contains visible hydrocarbons
4	LOAM/SAND	9	Incinerator Ash (some Metals accredited)	D	Contains glass / metal
5	SAND/CLAY			E	Contains roots / twigs
Note: 7,8,9 matrices are not covered by our ISO 17025 or MCertS accreditation, unless stated above.					

Soil Chemical Analysis:
All results are reported as dry weight (<40°C).
For samples with Matrix Codes 1 - 6 natural stones, brick and concrete fragments >10mm and any extraneous material (visible glass, metal or twigs) are removed and excluded from the sample prior to analysis and reported results corrected to a whole sample basis. This is reported as '% stones >10mm'.
For samples with Matrix Code 7 the whole sample is dried and crushed prior to analysis and this supersedes any "A" subscripts
All analysis is performed on the sample as received for soil samples which are positive for asbestos or the client has informed asbestos may be present and/or if they are from outside the European Union and this supersedes any "D" subscripts.

TPH by method A-T-007:
For waters, free and visible oils are excluded from the sample used for analysis, so the reported result represents the dissolved phase only.
Results "with Clean up" indicates samples cleaned up with Silica during extraction.

EPH CWG (method A-T-055) from TPH CWG:
EPH CWG results have humics mathematically subtracted through instrument calculation.
Where these humic substances have been identified in any IDs from "TPH CWG with clean up" please note that the concentration is **NOT** included in the quantified results but present in the ID for information.

Electrical Conductivity of water by method A-T-037:
Results greater than 12900µS/cm @ 25^0C / 11550µS/cm @ 20^0C fall outside the calibration range and as such are unaccredited.

Please contact your client manager if you require any further information.

Envirolab Deviating Samples Report

Hattersley Science & Technology Park, Stockport Road, Hattersley, SK14 3QU
Tel. 0161 368 4921 email. ask@envlab.co.uk

Client: iD GeoEnvironmental Ltd (Congleton), Dane Mill Business Centre, Broadhurst Lane, Congleton, CW12 1LA

Project: Edgehill Park, Whitehaven

Clients Project No: 4046

Project No: 26/06938

Date Received: 05/06/2026 (am)

Cool Box Temperatures (°C): 15.1

Lab Sample ID	26/06938/2	26/06938/4	26/06938/6
Client Sample No			
Client Sample ID/Depth	HRS2 1.50m	HRS4 1.50m	HRS6 1.50m
Date Sampled	29/05/26	29/05/26	29/05/26
Deviation Code			
F	✓	✓	✓

Key
F *Maximum holding time exceeded between sampling date and analysis for analytes listed below*

HOLDING TIME EXCEEDANCES

Lab Sample ID	26/06938/2	26/06938/4	26/06938/6
Client Sample No			
Client Sample ID/Depth	HRS2 1.50m	HRS4 1.50m	HRS6 1.50m
Date Sampled	29/05/26	29/05/26	29/05/26
PAH-16MS	✓	✓	✓

If, at any point before reaching the laboratory, the temperature of the samples has breached those set in published standards, e.g. BS-EN 5667-3, ISO 18400-102:2017, then the concentration of any affected analytes may differ from that at the time of sampling.

Envirolab Analysis Dates

Lab Sample ID	26/06938/1	26/06938/2	26/06938/3	26/06938/4	26/06938/5	26/06938/6
Client Sample No						
Client Sample ID/Depth	HRS1 1.50m	HRS2 1.50m	HRS3 1.50m	HRS4 1.50m	HRS5 1.50m	HRS6 1.50m
Date Sampled	29/05/26	29/05/26	29/05/26	29/05/26	29/05/26	29/05/26
A-T-019s		16/06/2026		16/06/2026		16/06/2026
A-T-024s		19/06/2026		19/06/2026		19/06/2026
A-T-031s		19/06/2026	19/06/2026	19/06/2026	19/06/2026	19/06/2026
A-T-032s		19/06/2026		19/06/2026		19/06/2026
A-T-044		19/06/2026	19/06/2026	19/06/2026	19/06/2026	19/06/2026
A-T-045	08/06/2026	09/06/2026	09/06/2026	09/06/2026	09/06/2026	09/06/2026

The above dates are the analysis completion dates, please note that these are not necessarily the date that the analysis was weighed/extracted.

End of Report