



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0703
LOCATION:	St Johns Farm Trout Lane Brooks Green West Sussex RH13 0JN
DESCRIPTION:	Demolition of existing buildings. Erection of 4no dwelling houses with associated parking and landscaping
SUMMARY OF COMMENTS & RECOMMENDATION: Environmental Health has reviewed the Preliminary Contamination Risk Assessment prepared by Chidhurst Limited, dated September 2025, and provides the following comments.	

MAIN COMMENTS:

1. Regarding the risk assessment presented within Table 4.1, whilst potential contaminant sources have been identified and assigned risk ratings, the methodology used to derive these ratings is not clearly explained. For clarity and transparency, the report should include an appropriate risk assessment framework, such as a risk matrix, demonstrating how the assigned risk levels have been determined with reference to the likelihood and consequence of identified pollutant linkages. This would provide suitable justification for the conclusions reached and assist in the assessment of potential risks associated with the site.
2. Environmental Protection Officers undertook a site visit on 30th June 2026 and make the following additional observations:
3. Given the historic use of the site, much of the site is understood to comprise made ground. The extent and nature of this material should be adequately characterised through a comprehensive programme of intrusive investigation and sampling to determine whether contamination is present and to assess any associated risks to future site users.
4. We concur with the findings of the Preliminary Contamination Risk Assessment that asbestos-containing materials (ACMs) are likely to be present in several areas across the site. As the existing buildings are proposed for demolition, an appropriate asbestos survey should be undertaken prior to any demolition works. Details of a suitable scheme for the identification, removal, handling and disposal of ACMs should be submitted and agreed. Any asbestos removal and disposal works should be undertaken by suitably qualified and competent contractors in accordance with relevant health and safety and waste management legislation.
5. During the site visit, two areas of raised ground were identified on either side of the building along the western boundary of the site. Based on the established vegetation cover, these deposits appear to have been present for a prolonged period. The origin and composition of this material are currently unknown and should therefore be included within any site clearance works and investigated as part of the intrusive ground investigation.
6. Four tanks were observed on site, some of which appeared to be disconnected. As acknowledged in paragraph 7.5 of the report, there is potential for historical fuel spills associated with the storage tanks and former mechanical and agricultural activities undertaken at the site. Evidence of staining was also observed within the northern barn. These areas represent potential sources of contamination and should be specifically targeted during the intrusive investigation, including appropriate soil sampling and analysis for petroleum hydrocarbons and any other contaminants associated with the site's historical use.
7. In light of the above, Environmental Health recommends that the intrusive investigation is designed to specifically assess the identified areas of potential concern and sufficiently characterise the nature and extent of any contamination present on the site.
8. If there is opportunity for the Preliminary Contamination Risk Assessment to be revised before determination that would be welcomed. However, this can be conditioned if not. We also welcome dialogue on the planned sampling strategy before the Phase 2 investigation is performed.

SUGGESTED CONDITIONS

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination, including asbestos contamination, of the site and extant structures shall each be submitted to and approved, in writing, by the local planning authority:
 - a. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
 - b. A site investigation scheme, based on (a) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. The site investigation shall be designed and implemented in accordance with BS10175:2026 Investigation of potentially contaminated sites – Code of practice.
 - c. The site investigation results and the detailed risk assessment (b) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: As this matter is fundamental to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works and to ensure that any pollution is dealt with in accordance with Policies 24 and 33 of the Horsham District Planning Framework (2015).

And

2. The development hereby permitted shall not be occupied/brought into use until there has been submitted to the Local Planning Authority verification that the remediation scheme required and approved under the provisions of condition X(b) has been implemented fully in accordance with the approved details (unless varied with the written agreement of the Local Planning Authority in advance of implementation). Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition X(b), unless otherwise agreed in writing by the Local Planning Authority.

Reason: As this matter is fundamental to ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works and to ensure that any pollution is dealt with in accordance with Policies 24 and 33 of the Horsham District Planning Framework (2015).

And

3. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that no unacceptable risks are caused to humans, controlled waters or the wider environment during and following the development works and to ensure that any pollution is dealt with in accordance with Policies 24 and 33 of the Horsham District Planning Framework (2015).

NAME:	Georgina Hermitage
DEPARTMENT:	Environmental Health and Licensing
DATE:	16/07/2026