From: Kevin.Beer
Sent: 13 June 2024 16:24
To: Amanda.Wilkes
Cc: Adrian.Smith; Madeleine.Hartley
Subject: DISC/23/0218 - Sumners Ponds

Importance: High

Dear Amanda

Environmental Health have reviewed the LEAP Environmental – Addendum Site Investigation, dated 07.06.24, and we have the following comments to make.

1. We are satisfied with the addition investigation and chemical testing of soils as detailed in the above report.

2. We note that elevated levels of lead and benzo(a)pyrene along with asbestos have been detected on the site during this most recent investigation. Whilst we are satisfied with the principle of the proposed cover system, as detailed in the current remediation method statement (RMS), in our view the current RMS needs to be revised with detail on the most recent investigation and the contamination that has been found.

3. We also note that the existing RMS cover both the northern and southern areas of the site. Given that further site investigation works are required in the southern part of the site, and taking into account the fact that the remedial requirements in the southern area may be different, we are of the view that the revised RMS should only make reference to the northern area and omit the southern part of the site. An RMS for the southern area will be required once sufficient testing has been undertaken in the southern area of the site.

4. From the reviewing the current RMS we also note that there is some inconsistency in the proposed testing of imported soils. The following is stated section 5:
   The test frequency will be as follows (to be advised by LEAP on a source by source basis depending on the quality of data provided prior to importation). Subsoil – I sample per 150-300m3 Topsoil – 1 sample per 100-150m3
   With the below stated in section 12:
   Once a source has been approved for importation the verification engineer will complete onsite inspection and verification testing. Imported topsoil and subsoil will be tested at a frequency of a minimum of one sample per 150m3 of imported soil with a minimum of three samples per source of material. Testing will be undertaken at a UKAS and MCERTS accredited laboratory.

   Whilst a sample frequency of one sample per 150m3 with a minimum of three samples per source of material is acceptable for a greenfield/manufactured source this testing frequency would not be acceptable to Environmental Health should the material come from a brownfield or unknown source. For material imported from a brownfield or unknown source it is our expectation that the material be subject to a sample frequency one sample per 50m3 with a minimum of six samples per source material.

5. We would be grateful if the above comments can be addressed in a standalone RMS for the northern part of the site.

Given the above and the requirements for a revised RMS Environmental Health are not in a position where we can recommend the part discharge of condition 12 for the northern part of the site.

Kind regards

Kevin

Kevin Beer
Environmental Protection Officer

[redacted]

Horsham District Council 50 YEARS



Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton