



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0934
LOCATION:	Watermead, Henfield Road, Cowfold, Horsham, West Sussex, RH13 8DT
DESCRIPTION:	Demolition of existing vacant storage buildings and erection of 9no. residential units, provision of open space and retention of pond.
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Geotechnical and Ground Contamination Risk Assessment Report Parts 1-4, prepared by Ashdown Site Investigation, dated July 2025	

MAIN COMMENTS:

Environmental health have reviewed the risk assessment report for this site and I have the following comments:

While I appreciate that a Phase 1 Risk Assessment and preliminary investigation have been performed, the locations sampled do not adequately cover all potential sources of contamination across the site. I visited the site on 28th August 2026 and my observations confirmed that further investigation is required.

In particular, the below areas need to be targeted for sampling:

- South-western corner of the site, beneath what are currently several derelict buildings. There is significant made ground in this area, including raised ground levels indicating possible historic movement or deposition of soil. Review of the block plans indicates that this area will form the gardens of Plots 1 to 4, resulting in a potentially complete pollutant linkage.
- There is a red diamond-shaped access cover immediately north of the derelict buildings. Further information should be provided regarding its purpose, as there is potential for it to be associated with a former fuel storage installation. The surrounding area should be targeted for investigation.
- Given the site's former use as a mechanical yard, the extensive areas of made ground may have been used for vehicle parking and maintenance activities, with associated risks from historic oil or fuel leaks. The two large areas of made ground immediately north and south of the main buildings should therefore be sampled.
- I was unable to inspect the interior of the main buildings during my site visit; however, I have reviewed the photographs provided within the report. The sampling undertaken to date does not adequately cover the majority of the building footprint. The suspected infilled inspection pit should be specifically targeted, together with sufficient sampling coverage across the remainder of the building footprint. This area is proposed to form residential gardens as part of the development and should therefore be appropriately investigated.
- The mound of earth adjacent to the pond was more extensive during the site inspection than was apparent from the report. The mound is several feet high and occupies a substantial area of the upper part of the site. While it is understood that this material may be removed from site, the underlying ground has not been investigated.
- The pond in the northern part of the site has dried out but has not been infilled. It should be established whether the material present within the pond comprises natural deposits or imported fill material.
- North-western corner of the site. Whilst this area appears to be greenfield in nature, additional sampling would still be expected given that it is proposed to form the gardens of Plots 8 and 9.

I am satisfied that these additional investigations can be secured by condition and undertaken following demolition of the existing buildings. However, given the extensive presence of ACMs across the site, an appropriate asbestos survey and assessment should be completed prior to demolition works commencing.

SUGGESTED CONDITIONS

Pre-commencement Condition: Prior to the commencement of any works of demolition or refurbishment all asbestos containing materials shall be identified in accordance with the guidance given in HSG264 Asbestos: The Survey Guide.

All confirmed or suspected asbestos containing materials shall be removed by an appropriately licensed and competent contractor. A written report detailing these works shall be submitted to and approved in writing by the local planning authority. The report shall include details of validation measures undertaken to ensure that all areas where works have been undertaken are free from asbestos, including copies of waste consignment notes.

And

Pre-Commencement Condition: 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. An updated 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

Pre-Occupation Condition: 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

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:	01/09/2026