



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DISC/26/0059
LOCATION:	Denver Storage, Okehurst Lane, Billingshurst, West Sussex, RH14 9HR
DESCRIPTION:	Application for Approval of Details Reserved by Condition 3, 4, 5, 6, 7, 8, 9, 10, 11,12 to approved application DC/22/1458.
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Environmental Assessment Services (EAS) Ltd Contamination Risk Assessment dated December 2024 Crucial Environmental Asbestos Demolition Report, dated 03.07.25	

MAIN COMMENTS:Conditions 3 and 4

Environmental Health has reviewed the EAS Contamination Risk Assessment and we have the following comments to make.

1. We note that a benzo(a)pyrene concentration of 380mg/kg was detected in TP3, it is however not clear what generic assessment criteria is being used for this site – we would be grateful if this can be clarified.
2. A lower concentration of Benzo (a) Pyrene was detected in the other sample from this location, from reviewing the laboratory certificate the depths states 'unknown', it is therefore not clear from which strata this sample was taken from.
3. From undertaking a site visit and discussing the above with the applicant we understand that this area in the vicinity TP3 will become soft landscaping. To delineate the lateral extent of this PAH contamination some further site investigation works may be required in this part of the site.
4. The logs provided are insufficiently detailed, it has therefore not been possible to form a view on what material is made/reworked ground and what is natural soils.
5. From undertaking a site visit we also note that the southern part of the site appears higher than surrounding areas of the site and whilst we appreciate that location TP9 found limited made ground soils we are entirely convinced that the made ground soils in this part of the site have been adequately characterised.
6. During the above-mentioned site visit it was also apparent that the ground to the south of building still in situ appeared higher than surround areas of land. Similar to the above we note that location TP11 found limited made ground, it is however not entirely clear if the made ground soils in this part of the site have been adequately characterised.

Given the above we are unable to recommend the discharge of these conditions at this time, we would however welcome dialogue with the applicants and/or their consultant on the above.

Condition 5

1. We have reviewed the above-mentioned asbestos report and we note the comment in section 6.3 'A programme for the removal, encapsulation or monitoring of asbestos materials should be identified in the Asbestos Management Plan. This work is beyond the scope of our current commission, though technical assistance can be provided to assist clients if required'.
2. In our view the asbestos report does therefore not constitute a 'method statement for the safe removal and disposal of asbestos containing materials', as required by this condition.

Given the above we therefore unable to recommend this condition for discharge.

Condition 11

1. We note that a documents in relation the proposed rainwater harvesting system have been provided. When we visited site we were informed however that, given

the removal of water neutrality requirements, that the applicant was no longer proceeding with a rainwater harvesting system.

2. We would therefore welcome written clarity on this from the applicant.

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	16/04/2026