

Lee Goosens
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Dear Lee,

Site Investigation Proposal: Jacksons Farm (Lot 9), Hammerpond Road, Lower Beeding, West Sussex

This issue of the proposal ("Issue 2") reflects comments made by the Local Authority Environmental Health Officer following a meeting on the 9th April 2026. Their subsequent comments provided by the Planning Officer State:

Lot 9

- 1. We note the proposals for this lot include a significant reduction in ground levels and, based on the site investigation information to date, we accept that this is likely to remove the majority of the made ground soils on this part of the site. However, as detailed in previous comments, there are unproven areas of made ground, in particular along the southern boundary of the site, and areas beneath existing buildings which have not been subject to any investigation. With this in mind we have revisited the latest site investigation report for this lot and undertaken a recent site visit and we remain of the view that a condition to ensure that these investigations are undertaken is required – the below condition is therefore re-recommended.*
- 2. Before the commencement of works to satisfy this condition we would however welcome dialogue with applicants environmental consultant so that exact scope of the investigation can be agreed.*

The purpose of this proposal is to set out the scope of works that will be carried out following the demolition and stripping of the site, for agreement by the Environmental Health Officer.

Proposed Development

The proposed development at Jacksons Farm will comprise the demolition of the existing barns and construction of 3 no. houses, with associated access driveways, parking and areas of garden.

To facilitate the agreed maximum ridge height of the development, it is proposed to reduce ground levels across the site. An average of 1260mm of soil needs to be excavated across the site, except for within root protection zones covering the trees along the northern boundary of the site.

Figure 1 below shows a comparison of existing (red) and proposed site levels.

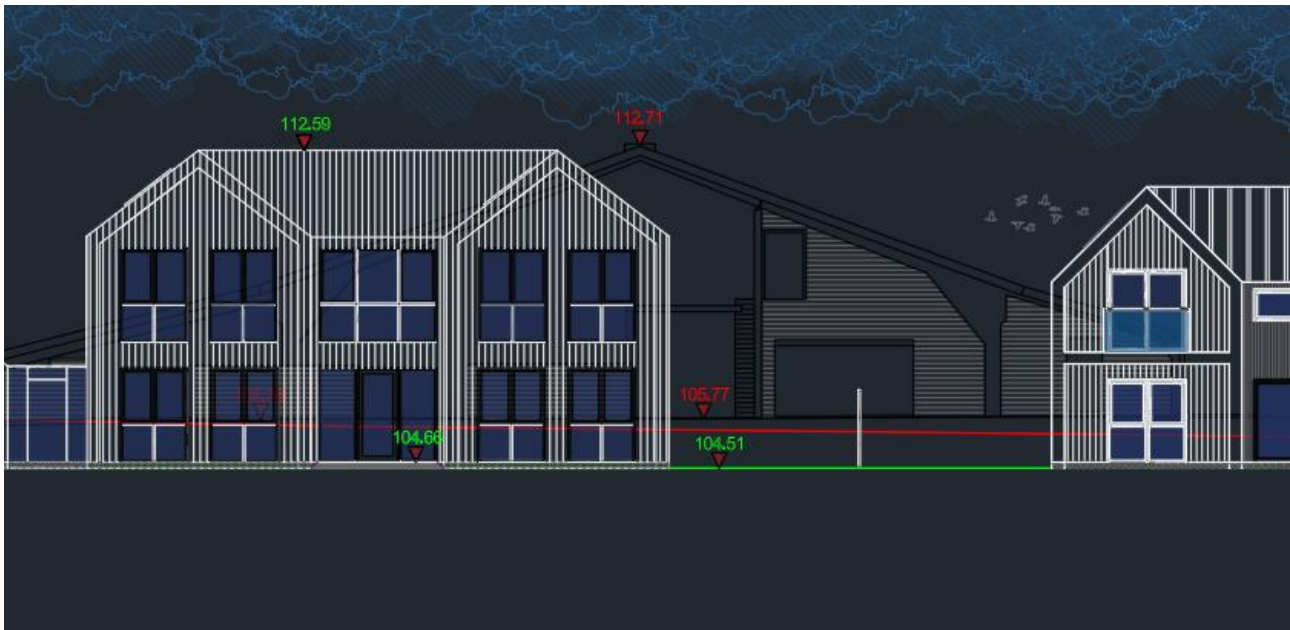
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Figure 1. Existing and Proposed Site Level



This removal of soils from the site is expected to result in the removal of most of the made ground, which the previously undertaken ground contamination risk assessment report¹ identified as a source of contamination requiring remediation.

Proposed Works

Background

The boreholes in the northern half of the site (WS01 to WS08), which include boreholes drilled through the footprints of the two large barns, recorded the made ground to extend to depths of less than 0.4m below existing ground level.

The reduction in ground level is therefore expected to remove all of the made ground from this area and expose the undisturbed soils of the Upper Tunbridge Wells Sand Formation.

The boreholes around the slurry pit (WS09 to WS11), recorded made ground to depths of up to 1.7m, and therefore some made ground may be expected to remain following the reduced level excavation. The concrete base and sides of the slurry pit are expected to be broken out and the resulting excavation filled with inert material. This will then need to be capped with suitable cover soils, as set out within the remediation strategy for the site², as it lies within the area of the proposed rear gardens.

¹ Ashdown Site Investigation Ltd., Project Ref: P17132, Report Ref: R16640, dated 8th May 2025

² Ashdown Site Investigation Ltd., Project Ref: C17195, Report Ref: R16689, dated 16th May 2025

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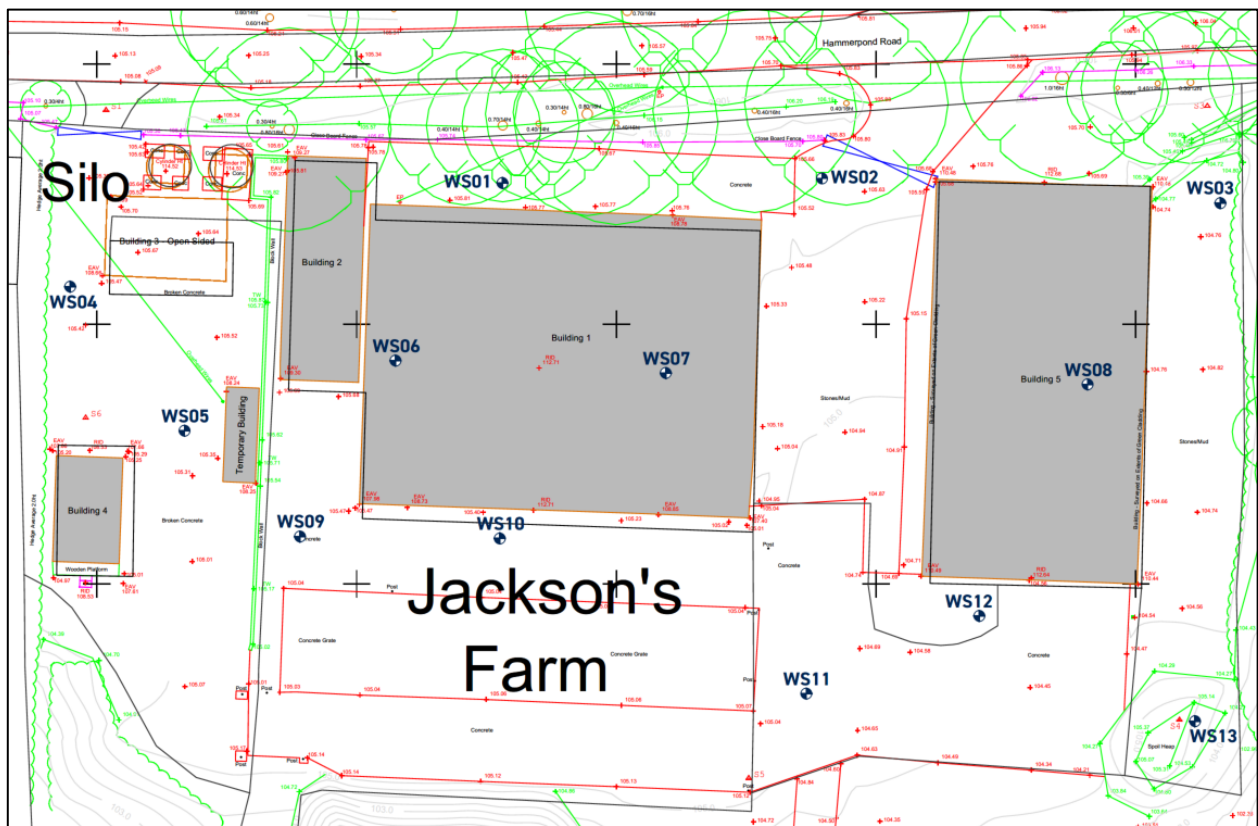
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The soil stockpile at the location of WS13 will be completely removed, and the underlying ground level reduced.

A copy of the borehole location plan from the previous phase of investigation is presented below.

Figure 2. Previous Borehole Location Plan



Further Works

As noted above, the reduction in the site level will result in the complete removal of the source of contamination from the majority of the site. The removal of slurry from the pit, it's breaking out and subsequent backfilling with gravel will eliminate any potential remaining source of ground gases.

Following the level reduction, the formation level will be inspected for any visual or olfactory evidence of made ground, or any other suspected contamination. Should no evidence of suspected contamination be observed at the formation level, then samples of the undisturbed Tunbridge Wells Sand will be taken from six locations (denoted HA101 to HA106).

Positions HA101 to HA105 are located beneath the footprints of the former buildings, while HA106 is located beneath the above ground stockpile previously targeted by WS13 to confirm the removal of all contamination spoil.

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In the event that suspected contamination is observed at the formation level, then additional boreholes will be drilled targeting those locations. These boreholes (if required) will be drilled to a depth sufficient to prove the depth of any made ground or suspected contamination, subject to the ground conditions present.

Four boreholes (designated as WS101 to WS104) will be drilled around the outline of the slurry pit. The target depth of these boreholes will be 2.0m below the formation level, or to a depth sufficient to prove the base of the made ground soils.

A fifth borehole (WS05) will be drilled at the location of WS12 to a depth sufficient to prove the made ground.

As the site strip will not extend into the root protection area of the trees along the northern boundary or a heavily vegetated area along the eastern boundary, some made ground is expected to remain, though this area will end up forming a relatively steep bank. The results of the previous testing within boreholes WS01 to WS03 suggest that the made ground in the north of the site **may** not contain significantly elevated concentrations of heavy metals or PAH compounds.

To determine whether the made ground that remains along the northern and eastern boundaries poses an unacceptable risk to the end users, a further ten shallow samples will be taken from positions designated HA201 to HA210.

Because of the presence of tree roots and the bank, and as the area is covered by a root protection zone, it is considered very unlikely that future end users will excavate into this area to any significant depth. As such it is proposed that the samples will be taken using hand tools from within pits dug to a maximum depth of 0.3m, to provide representative samples of the soils which end users could conceivably come into contact with, or that may generate dust. These pits will **not** prove the total depth of made ground.

A copy of the proposed exploratory hole location plan is included as Figure 3 below, with a larger version presented in Appendix A.

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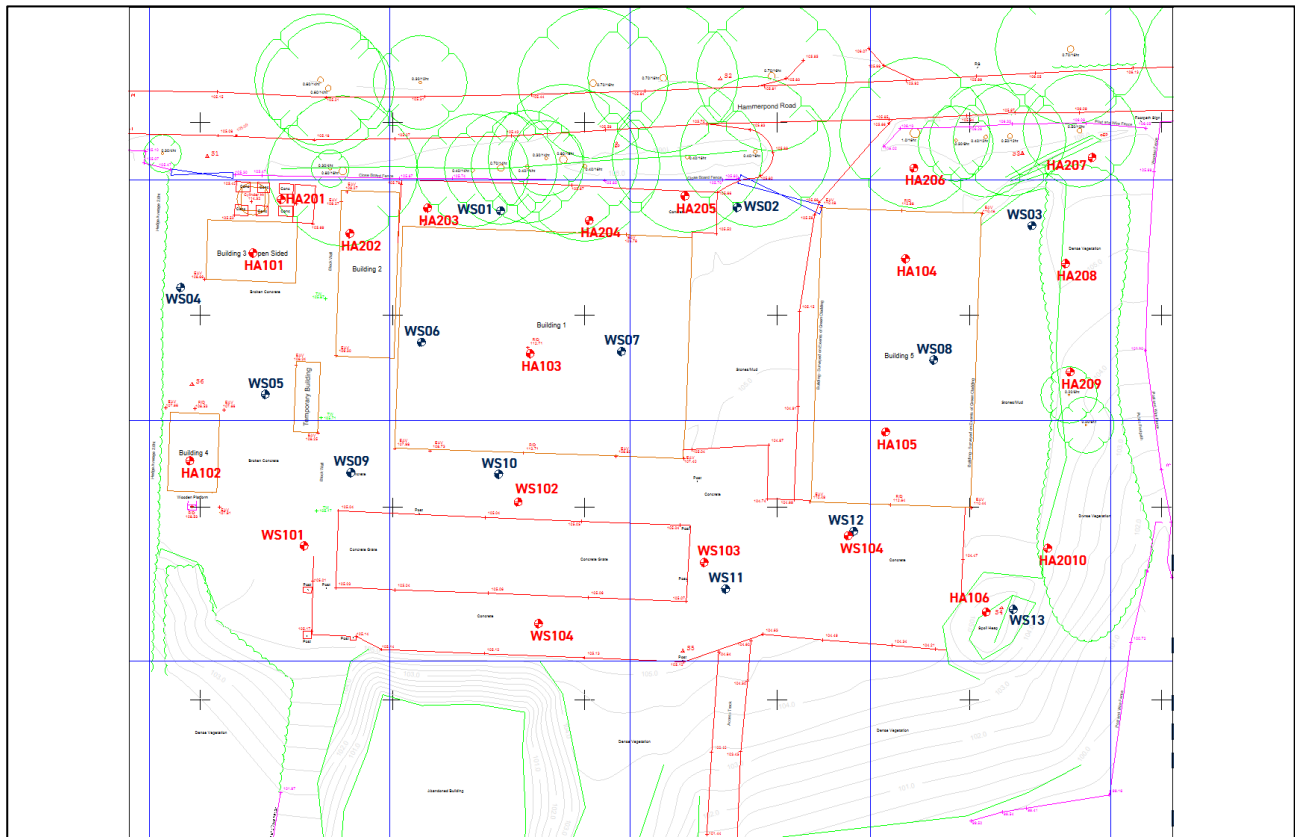
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Figure 3. Proposed Exploratory Hole Location Plan



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Sampling and Testing

If no visual or olfactory evidence of contamination is identified at the formation level, then samples of the undisturbed Tunbridge Wells Sand from HA101 to HA106 will be taken from depths of between ground level and 0.2m. These samples will be tested for heavy metals, PAH compounds, petroleum hydrocarbons and BTEX compounds.

In addition, should suspected contamination be identified at the formation level of the undisturbed Tunbridge Wells Sand, then samples of the contaminated soils will be obtained and tested for the above range of contaminants. Samples will also be taken from each position from the soil stratum below the suspected contamination.

As the made ground at the locations of WS101 to WS105 has already been shown to contain concentrations of heavy metals and PAH compounds above soil screening values, no further testing of these soils is proposed.

As heavy metals and PAH compounds are effectively immobile in the soil matrix, the risk of downward migration to the undisturbed soils is negligible.

To confirm the findings of the previous investigation that no significant contamination is present around the slurry tank, samples from approximately 0.5m intervals throughout the boreholes (intercepting both any remaining made ground and the undisturbed soils below) will be tested for the presence of petroleum hydrocarbons.

However, if any evidence of staining or odours are noted, that could indicate localised contamination with petroleum hydrocarbons, then samples of the stained stratum will be tested for the presence of petroleum hydrocarbons. Further samples from below any stained soils will also be taken and tested for the presence of petroleum hydrocarbons.

The samples of made ground recovered from HA201 to HA210 will be tested for the presence of heavy metals and PAH compounds.

Assessment of Results

The results of the laboratory testing from HA101 to HA106 and WS101 to WS105 will be compared with published soil screening values (SSV) comprising either the S4Uls or C4SL calculated for a generic "Residential" end use.

For the area of the root protection zone, the results of the testing HA201 to HA210 will be assessed against the SSV calculated for the generic residential land use **without** plant uptake, as it will not be possible to grow any significant volumes of fruit or vegetables within the narrow banked area.

The assessment report will include an updated conceptual model.

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In the event that the updated assessment does not identify any further complete pollutant linkages beyond those already identified by the previous investigation works, then no additional remedial works, beyond those already recommended would be considered to be required.

Regulatory Approval

It is recommended that this proposal is submitted to the Local Authority prior to any further works being undertaken.

Yours sincerely,

Alex Bewick
Ashdown Site Investigation Ltd.

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Appendix A

Proposed Exploratory Hole Location Plan

