Tamara.Dale

From: Tamara.Dale
Sent: 01 August 2025 14:58
To: Tamara.Dale
Subject: FW: DISC/24/0263 - Former Arun Feedmills

From: Kevin.Beer <[redacted]>
Sent: 01 August 2025 12:36
To: Oliver Hicks <[redacted]>
Cc: Roger Atkinson - Forays <[redacted]>; Tamara.Dale <Tamara.Dale@horsham.gov.uk>
Subject: DISC/24/0263 - Former Arun Feedmills

Dear Oliver,

Environmental Health have reviewed the Ground and Water Phase II Site Investigation Report, dated July 2025, and the comments in the email from Ground and Water, dated 24.07.25, and we have the following comments to make.

1. The additional logs and plans provided in the updated report are welcomed. On the assumption that the site boundary has been accurately plotted on all the figures, when we compare the trial pit locations on Figures 3 and 5 with the locations on Figure 7 there would appear to be some significant inconsistencies in the trial pit locations between the plans. To give one example – Figures 3 and 5 show that north eastern part of the site have been subject to good coverage, however from reviewing Figure 7 it now appears that a significant part of the north eastern part of the site have been subject to very limited investigation and given this area will become soft landscaped/garden areas this is a concern. We appreciate that the locations may not have been surveyed in and that they will be a degree of uncertainty associated with this, there does however appear to be some large inconsistences between the plans with a general shift in the location of the positions towards the south west.
2. We note that S16 and S17 were advanced in an attempt to find an area where a tank had been removed from the ground and resultant void backfilled, we assume therefore that some significant depths of made ground are likely to be present in this part of the site. We note however that no significant depths of made ground were detected in S16 or S17 so it would appear that this former tank location has been not been found which is a concern.
3. When we have visited site in the past a bund has been present along the south eastern side of the side which we assume locations 'bund sample 2' and S20 have been taken from. We were not aware of the bund which samples 'bund sample 1' and S21 have been taken from – is this an historic feature or a stockpile/bund from the groundworks earlier in the year?
4. In addition to the above comment on the bunds we assume that significant depths of made ground are present in the bunds around the permitter of the site, the fact that there are no logs have been provided for the locations that were advanced into the bunds is a concern.
5. Comment 6 in the email from Ground and Water states – 'These four samples were two samples S18 and S19 from the stockpiled material that had fallen into the void and S20 and S21 were from the boundary bund. While no logs have been produced the soils are described in a standalone table in section 5.1 of the report'. We assume this is a typo as there is table in section 4.1 and not 5.1, we would be grateful if Ground and Water can confirm this.
6. Comment 8 in the email from Ground and Water has not addressed our previous comments. To clarify – we are trying to form a view as to whether hydrocarbon odours detected in Plot 3 and Plot 4 during a previous investigation phase are from the same area of hydrocarbon impacted soils or two different areas.

7. We note the comment that no further sampling could not be undertaken from the large void towards the southern part of the site due to ground conditions, it is however still not clear if sufficient sampling of this void has been undertaken.
8. The photos provided in Appendix C are welcomed, they are however of of the one part of the site, photos of all locations have not been provided.
9. The topographical survey provided by Forays Homes appears to show a structure called 'IC' on the plan. We assume this refers to an interceptor, it is however not clear if this is still present or has been removed from the ground.
10. We fully appreciate that Environmental Health were consulted on this latest investigation back in April/May. As far as we can tell the information provided to us at the time did not indicate the tank near the site entrance, this appears to have come to light more recently, the discussions were also based on a trial pit location plan which, as detailed above, may not be accurate.

In summary – the additional site investigation works on the site are welcomed, there does however appear to be some significant information gaps/inconsistencies which need to addressed. Unfortunately Environmental Health are therefore not currently in a position where we can recommend the discharge of condition 4.

From previous email correspondence we appreciate the commercial pressures of this development and that you intend to start works on Monday 11th August, I have been advised to make Forays Homes aware that if ground works do start on Monday 11th August and the above-mentioned condition has not been discharged then the matter will be referred to our Planning Compliance team.

Regards

Kevin

Kevin Beer
Environmental Protection Officer (Pollution)

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Horsham District Council