



MEMORANDUM

To: Catherine Howe
Norman Kwan

Date: 21 September 2018

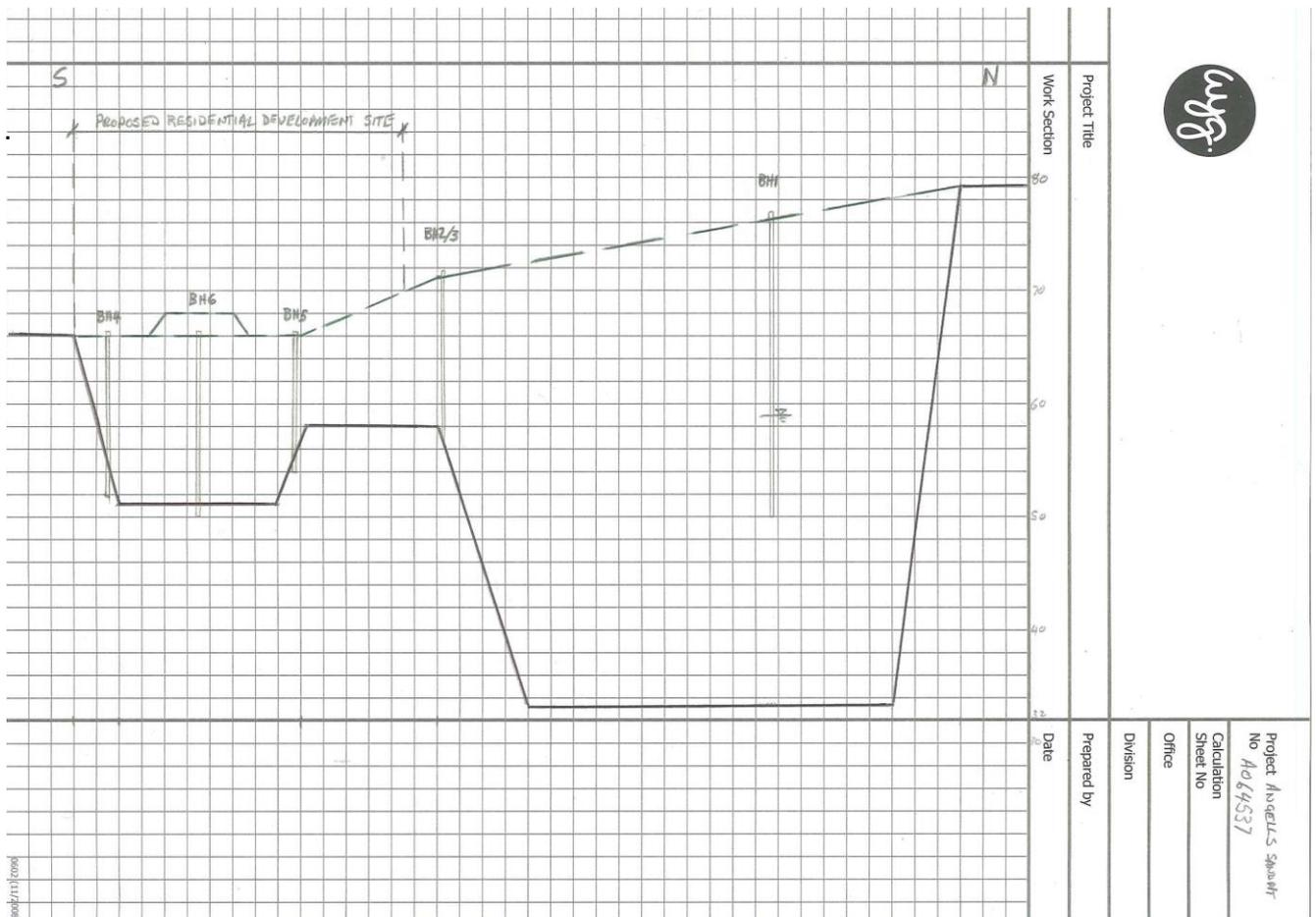
From: Lee Money
Environmental Health & Licensing

Your ref:

**Storrington Sullington Neighbourhood Plan
Proposed Allocation of Angell's Pit Water Lane Sullington**

Thank you for your request to provide further comments on the proposed allocation of Angell's Sandpit former landfill site

Development on the southern part of the landfill now occupied by the Angell's Sands development was considered acceptable due to the relatively shallow depth of infilling in this area. The conceptual model for the site showed that this area of the landfill was separated from the main body of the landfill to the north by an unquarried out crop of natural geology. This is illustrated in the figure below:



The investigation reports prepared ahead of the proposed surrender of the waste management licence determined that the potential for gas production was low enough in shallower part of the landfill to allow residential development. However the reports also determined the presence of high levels of methane (approximately 40%) in the main body of the landfill, although recorded flows were not considered high enough to offer significant risk of gas migration off site.

It was considered that development of the southern part of land fill was acceptable subject to adoption of the highest levels of gas protection (Amber (ii) in the NHBC “traffic light classification”) for the dwellings.

The principal concern that the Horsham District Council Environmental Health Officers have in relation to the allocation of this site is therefore principally due to the depth of the fill and documented potential for ground gas generation. The depth of filled material is known to be in excess of 13m and conventional construction techniques would significantly disrupt the capping and structure of the landfill.

The Desk Study Report provided in support of the allocation makes a number of key observations relating to development of the site:

- *Section 2.17*

“..this area should be considered to represent a potential source of degrading materials and ground gases and vapours until proven otherwise.”

- *Section 3.4*

“Where foundations are required in areas of Made Ground or infilled ground, which is likely to be present to depth beneath areas of the site a deeper or piled foundation solution may be required.”

“the use of soakaways would also only be acceptable in areas remote from any contamination and infilled/Made Ground that are identified on the site. Such areas are likely to be rare given the sites historical use, and may require the use of deeper borehole soakaways.”

- *Section 4.2*

“It may be necessary to undertake remediation/risk mitigation measures on this site to break pollutant linkages and thus protect key receptors such as human health, controlled waters, built environment, soft landscaping and the like. The requirement and extent of any such remediation cannot be determined until such time as an intrusive investigation and associated testing has been completed”

Taking into account these comments, the Environmental Health Officer view is that it is likely that there will be major technical challenges to be overcome in developing the site. It would need to be demonstrated as to how the costs of mitigating risks from contamination at the site together with the necessary engineering and drainage solutions would not significantly impact the viability of any development.

It is inappropriate to rely on conditions to manage the development of such a complex and potentially hazardous site. This is because Planning Authorities must ensure that land cannot be determined as contaminated land under Part IIA of the Environmental Protection Act 1990.