



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/25/0403
LOCATION:	Stonehouse Farm, Handcross Road, Plummers Plain, West Sussex, RH13 6NZ
DESCRIPTION:	Full Planning Application to form a comprehensive masterplan including: 1. Rationalisation and enhancement of existing commercial facilities (Use Classes E(g) B2 and B8 at Stonehouse Business Park including demolition of two buildings and their replacement with new Class E(g), B2 and B8 facilities. Extension of existing building to form a new office and wardens' accommodation. Existing mobile home removed. 2. Decommissioning of the Anaerobic Digester and re-use of the existing 2no buildings for storage and office uses (Class E (g) and B8) and the diversion of a public footpath. 3. Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3no. dwellings with access, parking, and landscaping.
RECOMMENDATION:	Further information required

MAIN COMMENTS:**Proposed Water Supply**

We have reviewed the Daedalus Environmental Ltd Water Neutrality Statement, dated August 2025, and we have the following comments to make.

1. We note that the following is stated in section 3.1.2 'The three new residential dwellings on site at Jacksons Farm will be fitted out with fixtures and fittings and rainwater harvesting systems that also deliver a Part G calculated demand level of 85l per person per day'.
2. Rainwater harvesting systems (RHS) can be highly contaminated. In order to provide the LPA with sufficient confidence that the above mentioned RHS will be maintained and managed for the lifetime of the development a detailed private water supply management and maintenance plan will need to be submitted in support of the application. This document should be provided by a suitably competent and qualified consultant who specialises in private water supplies and include, but not necessarily be limited to, the following information.
 - Detail on the likely contaminants associated with the rainwater harvesting system, including contaminants associated with the components of the proposed system.
 - Detail on what type of treatment that will be installed on the supply with information clearly indicating that it is appropriate for the amount of water being used and the likely contaminants.
 - Detail on the proposed sampling and testing regime, undertaken in accordance with Private Water Supplies (England) Regulations 2016 (or subsequent superseding equivalent), and taking into account the likely contaminants, as detailed above, along with detail on how any failure of any samples will be investigated and managed.
 - Detail on the maintenance, servicing and cleaning of the tanks, water treatment equipment, pumps, all pipework etc for the lifetime of the development along with regularity of servicing/maintenance and clarification what steps will be taken in the event of equipment failure. This should include any re-activation of the system after it has been out of use due to lack of rainfall/use.
 - Details, including a plan or schematic, showing the supply – storage tanks, treatment etc, and means to record the total water consumption of each unit.
 - Detail on the continuity of supply during dry periods extending beyond 35 days.
 - Arrangements for keeping written records of all sampling, results of analysis, inspection, cleaning, and maintenance.
3. From undertaking a recent site visit we also note that a rainwater harvesting is already in place at the area known as Lot 8. It is however not clear from the supporting information if the proposals for this part of the site will utilise this existing private water supply.

Land Contamination

Ashdown Site Investigation Ground Contamination Risk Assessment Report dated 08.05.25

1. The report provides detail on an investigation on the parcel of land known as Jacksons Farm.
2. Thirteen window which found made ground soils up to 1.70mbgl. We note however that made ground soils were not proven in WS12 or WS13 which is a concern.
3. From comparing the sample depths on the laboratory certificates with the borehole logs the sampling would appear to be quite limited – in some locations

just the made ground has been sampled and in other locations just the underlying natural soils has been sampled. Whilst information on both is welcomed we would like to see sampling of both made ground and underlying natural strata.

4. We also note that there was significant variation of made ground soils in WS09 yet samples were only collected from two depths – 0.10m and 1.30m.
5. We also note that the response zone for WS09 was between approximately 2.00m and 2.90m with material at this depth described as light grey, yellow brown, orange brown and light brown gravelly clay. The fact that a monitoring well has been advanced in close proximity to the slurry pit is welcomed and we note that elevated levels of ground gases have been detected. However, given that the response zone is located in material that is predominantly clay our concern is that more elevated levels of ground gases could be present in the made ground soils present above this clay material and the way that the borehole has been installed means that these aren't being detected.
6. To summarise the above – in our view the investigation undertaken is an exploratory investigation and a more detailed main investigation, as detailed in 'BS10175 Investigation of potentially contaminated sites – Code of practice' is required.

Ashdown Site Investigation Remediation Strategy dated 16.05.25

1. Whilst the fact that a report of this nature has been provided in support of this application until we are satisfied that sufficient site investigation works have been undertaken on land referred to as Jacksons Farm we are unable to review this report in detail.

Ashdown Site Investigation Executive Summary Report dated 16.05.25

1. We note that the following is stated in section 3 'several phases of investigation works were carried out in 2024 to assess the made ground and these have found that the made ground does not contain concentrations of contaminants that would pose an unacceptable risk to end users of a commercial/light industrial development, or to controlled waters' and 'As such, no potential sources of contamination are considered to be present at the site'.
2. We have provided further comment on the reports for this area of the site but we are not currently in a position where we can agree with this conclusion – the significant depths of made ground present potential on and off-site sources of ground gas and this requires further assessment.
3. From reviewing section 4.2 it would appear that the only further works recommended in the area known as Jacksons Farm is some further ground gas monitoring. Whilst we accept this is required this should be undertaken as part of a wider and more detailed main investigation – more detailed comments on this area are provided below.

Southern Testing letter report dated 29.01.24 – Geoenvironmental Investigation at Stonehouse Farm

1. The report provides detail on an investigation on land to the north/north east of the barn located at Stonehouse.
2. Six trial pits were excavated, and significant depths of made ground/fill were detected. Of particular concern are the ground conditions in vicinity of TP1 and TP2 which found made ground from ground level to 3.50mbgl. The made ground soils at these locations were not proven however, made ground soils between 3.50m and the natural soils below have therefore not been investigated.
3. We note the conclusion in the report 'The intrusive investigation works, and subsequent laboratory analysis of selected samples undertaken to date, have not identified any significant contamination within this material. However, it should be noted that given the significant volume of material, and its unknown origin, it is possible that more onerous contamination could be present in discreet

pockets'. The fact that no significant elevated levels of contamination have been found is welcomed, however, as detailed above, given the amount of waste material present and the fact that not all the trial pits have proven the depths of made ground soils there is the potential for undetected contamination to be present.

4. In our view, given the depths of made ground present, this material also presents a potential source of ground gas, there is however no assessment in the report on the risk from ground gases on proposed buildings or future site users.

Southern Testing letter report dated 20.11.24 – Land to the West and South West Side of Stonehouse Farm

1. The report provides detail on an investigation on land to the west/south west side of Stonehouse Farm barn.
2. Six trial pits were advanced and up to 2.20m of made ground, proven at all locations.
3. We note that when compared to generic assessment criteria (commercial) no significant elevated levels of contamination were found which is welcomed. However, given the depths of made ground present, this material also presents a potential source of ground gas, there is however no assessment in the report on the risks from ground gases on proposed buildings or future site users.
4. We note that when compared to generic assessment criteria (commercial) no significant elevated levels of contamination were found which is welcomed. However, given the depths of made ground present, this material also presents a potential source of ground gas, there is however no assessment in the report on the risks from ground gases on proposed buildings or future site users.

Southern Testing letter report dated 20.11.24 – Land to the East Side of Stonehouse Farm Barn

1. The report provides detail on an investigation on land to the east side Stonehouse Farm barn.
2. Four trial pits were advanced and up to 2.10m of made ground was detected, proven at all locations.
3. We note that when compared to generic assessment criteria (commercial) no significant elevated levels of contamination were found which is welcomed. However, given the depths of made ground present, this material also presents a potential source of ground gas, there is however no assessment in the report on the risks from ground gases on proposed buildings or future site users.

Southern Testing letter report dated 20.11.24 – Bund to the South Side of Stonehouse Farm Barn

1. The report provides detail on an investigation of the bund to the south side of Stonehouse Farm Barn.
2. Three trial pits were advanced and although ground conditions have been summarised in section 4.4 full trial pit logs in accordance with current industry guidance have not been provided which is a concern.
3. We note the investigation has not detected any significant within the bund which is welcomed. We appreciate the proposed commercial use of the site, however given the size of the bund and its likely variable composition we are not currently convinced that sampling in three locations provides the LPA with sufficient confidence that elevated levels of contamination are not present within the bund.

Summary

The fact the above reports have been provided in support of the application is welcomed. However, given our comments above we are of the view that further investigation is required in relevant parts of the site to fully address the risks from contamination to future site users.

If there is an opportunity to undertake some of these further assessments prior to determination then this would be welcomed, if not then we are happy to request these further investigations and assessments through suitably worded planning conditions, once we are happy that the above matter in relation to water neutrality has been addressed.

Construction Phase

During site clearance, preparation and construction there is the potential for local residents to experience adverse impacts from noise, dust and construction traffic movements. These should be minimised and controlled by the developer and a construction environmental management (CEMP) plan will be recommended as a condition, once we are satisfied that the above matters have been addressed.

Suggested Conditions

N/A

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	26/09/2025