



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/0446
<b>LOCATION:</b>	Crays Barn, Crays Lane, Goose Green, Pulborough, West Sussex, RH20 2LR
<b>DESCRIPTION:</b>	Demolition of 2no. agricultural buildings and the erection of 3no. dwellings.
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b>	
Objection – further information required	

**MAIN COMMENTS:****Noise and Odour**

An Environmental Health Officer has recently visited the site and it was noted that another agricultural building is located to the immediate north of application site. We appreciate that this building to the north is subject to another live planning application, we understand however that the building has previously been used to house livestock.

Given the above we therefore have concerns regarding the potential impact on amenity from noise and odour should this application be granted and this building to the north be used for more intensive and/or intrusive agricultural activities again in the future.

**Proposed Water Supply**

Environmental Health have reviewed the submitted information and we have the following comments to make.

1. For planning applications within the jurisdiction of HDC where a borehole or boreholes are proposed to supply potable water to a proposed development, or to offset at an offsite location, we request that the application is supported by a groundwater investigation report, produced by a suitably competent and qualified consultant and undertaken in accordance with appropriate British Standards and technical guidance, containing the below information:
  - Detailed commentary on the site investigation and the sampling of the boreholes with reference to current British Standards and technical guidance.
  - Detailed commentary on the sampling results and comparison to UK assessment criteria.
  - Should elevated levels of parameters be detected then sufficient detail on proposed treatment system or systems, including a schematic of the treatment system.
  - Site location plan and site plan showing location of the boreholes on the application site.
  - Borehole logs in accordance with current British Standards
2. Whilst some level of detail has been provided, which is welcomed, in our view a groundwater investigation report in accordance with the above has not been provided.
3. Although there are concerns with the information on the groundwater investigation, as detailed above, from reviewing the South East Water 1274019-2 we note that ten parameters have been detected in the groundwater underlying the site in concentrations that exceed the maximum allowable level. Of particular concern are the below parameters:  
Turbidity – 74 times over the maximum allowable level  
Aluminium – nearly 37 times over the maximum allowable level  
Iron – 78 times over the maximum allowable level  
The above is a significant concern to Environmental Health.
4. From reviewing the Invicta Water Treatment letter report, dated 31.01.25, we note the comment on page 4 '*The treatment train will be similar to that for the Brook Hill Development, recently accepted by HDC and reported on by HDC consultant Dr. G. Pearce; and also, Lime Kiln Farm, Copsale*'. Given the difference in groundwater chemistry we do not feel it is appropriate to compare this site with other sites where reverse osmosis treatment has been accepted.
5. We note that the treatment proposals are detailed in the remaining part of the above mentioned document and a 'Permeate Throttling (Variable), Concentrate Recirculation' in a separate document. Environmental Health are however not qualified to comment on this level of technical detail and on the suitability of the proposed treatment as a groundwater treatment option at this site.

6. It is Environmental Health's professional opinion that the LPA will need to obtain sufficient confidence prior to determination that the proposed treatment system will be able to reduce elevated parameters to within acceptable levels and is a viable treatment option for the lifetime of the development.
7. Once we have received sufficient information on the groundwater investigation, which Environmental Health can review, the LPA will need to seek independent technical advice on the above-mentioned Invicta Water Treatment report.

Additional Comments:

1. Given the agricultural use of the site there is the potential for the landuse history to have impacted local groundwater. It is however not clear if the applicants consultants have taken this into account when they have undertaken the groundwater monitoring.
2. Given the size of the proposed site the two boreholes, as proposed, could lead to each borehole impacting the other so potentially reducing yield.
3. We also note that the sewage treatment plants are proposed on the site. It is our understanding that sewage treatment plants are not permitted within zone 1 (inner zones) of a borehole. Given the proposals include boreholes, as detailed above, the fact that both boreholes and sewage treatment plants are proposed on the same site is therefore a concern to Environmental Health.
4. The LPA should seek further technical advice from the Environment Agency (EA) on the above matters, in particular the close proximity of the boreholes to one another and the fact that the proposals include sewage treatment plants in close proximity to the boreholes.

### **Land Contamination**

Environmental Health have reviewed the supporting information in relation to land contamination and we have the following comments to make.

#### Your Environment Phase 1: Desktop Study and Preliminary Risk Assessment, dated April 2021

1. The appendices have now been provided, we are now satisfied with the preliminary assessment of the risks to future site users.

#### Your Environment Geotechnical Investigation, dated May 2021

1. We note the comments in section 8.3 'The results of the chemical laboratory testing and subsequent discussion and recommendations are included in a separate report issued under separate cover'. As far as we are aware this information has still not been provided.

#### H Fraser Consulting Ltd Phase II Site Investigation, dated January 2025

1. The logs are insufficiently detailed and do not provide sufficient detail on ground conditions encountered, sampling depths, visual/olfactory evidence of contamination etc.
2. From reviewing the sampling depths on the laboratory certificates and comparing these to the logs in the report it has not been possible to form a view on what strata has been sampled as the sample depths appear to straddle different depths. To give one example – in TP4 topsoil was found to 0.1m, made ground was found to 0.4m and material logged as 'brown mottled clay with roots' was present from 0.4m to 1.2m. From reviewing the laboratory certificates the soil samples were collected from between 0.00m and 0.50m, it is therefore not clear if the samples were collected from the topsoil, the made ground or the material logged as brown mottled clay.

3. No photos of the trial pits and arisings have been provided.
4. Given the fact that the logs have been produced by CK Drilling and there are no photos we have formed the view that the consultant wasn't on site for the site investigation which given the potentially complex land use history of this site is a concern.
5. We note the comments in the conclusions 'No remediation works are deemed necessary with regards to contamination; the site is considered suitable for the proposed future use'. Unfortunately we are not currently in agreement with this statement.
6. Given the above further site investigations are required on the site. We are however to request this information through conditions, once sufficient information on water quality has been provided as detailed above.

### **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 happy that the above matters have been addressed.

### **Summary**

Given our comments in relation to the proposed private water supply we are of the view that the application is currently insufficiently detailed to be determined.

### **ANY RECOMMENDED CONDITIONS:**

N/A

<b>NAME:</b>	Kevin Beer
<b>DEPARTMENT:</b>	Environmental Health and Licensing
<b>DATE:</b>	07/05/2025