HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/24/1268
LOCATION:	High Barn, Crays Lane, Goose Green, RH20 2LR
DESCRIPTION:	Variation of Condition 1 of previously approved application reference DC/21/2144 (Demolition of 2No. agricultural buildings and the erection of 3No. dwellings). Variation to allow amendments to siting, design and form of Plots 1, 2 and 3 and layout of car parking.
SUMMARY OF COMMENTS & RECOMMENDATION: Objection – further information required	

MAIN COMMENTS:

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. We note that a geotechnical report has been provided, comments on which are provided below, in our view a groundwater investigation report should be based on the format of this geotechnical report.
3. Although there are concerns with the information on the groundwater investigation, as detailed above, from reviewing the South East Water 1274019-2 analytical report 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 06.08.24, 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 'Single Pass RO Projection' 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 may not be permitted within a zone 1 (inner zone) 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 Your Environment Phase 1: Desktop Study and Preliminary Risk Assessment, dated April 2021, and we have the following comments to make.

1. The appendices have not been provided, we are therefore unable to fully review and comment on this report.

Environmental Health have also reviewed the Your Environment Geotechnical Investigation, dated May 2021, and have the following comments to make.

1. From reviewing the proposed site layout in Appendix A this report is based on a previous scheme/application. It therefore cannot be used to support this current application.
2. Whilst information on ground conditions is welcomed, none of the locations targeted areas of the site that will become soft landscaped/garden areas.
3. 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 not been provided.
4. In our view, given our experience with similar sites, there is also the potential for contaminated soils to be present underneath the existing concrete hardstanding on the site – these areas have not however been subject to any investigations.
5. 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

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	05/11/2024