# HORSHAM DISTRICT COUNCIL CONSULTATION

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| **TO:** | Development Control |
| **FROM:** | Environmental Health and Licencing |
| **REFERENCE:** | DC/24/0356 |
| **LOCATION:** | Staalcot Farm, Stall House Lane, North Heath, West Sussex, RH20 2HR |
| **DESCRIPTION:** | Use of land for the stationing of 4 static caravans and 4 touring caravans for residential purposes, together with the formation of hardstanding and associated landscaping. |
| **RECOMMENDATION:** | Objection – further information required |
| **SUMMARY OF COMMENTS & RECOMMENDATION:**<br>Comments relating to below documents:<br>Email from agent dated 12.04.24 | |

**MAIN COMMENTS:**

Proposed Water Supply

We have reviewed the email from the agent, dated 12.04.24, and we have the following comments to make.

1. We note that reference is made to Building Regulations, Building Regulations do not however apply to caravan sites, which is why the matters regarding cesspools and soakaways are raised at the planning stage. For all applications for caravan sites we request detail about the type and placement of the cesspools or sewage treatment tanks and the methods for disposing of the treated or collected sewage. These matters are fundamental to the decision about whether the site is suitable for residential use.
2. We do not have information about the extent or location of the Archaeological Notification Area. If the requested details are provided then the LPA, which presumably has this information, will be able to assess whether the ANA will be affected, or whether, as we stated, the methods for collection and disposal of sewage, rainwater storage and drilling of a borehole need to be changed to accommodate the requirements of this ANA. If the applicant or agent cannot provide this information this will affect the decision which the LPA makes.
3. It is also important to consider sewage disposal in relation to boreholes, so a plan of the proposed positions of all of these facilities would permit a proper assessment of the interaction and feasibility of each. We also note that since our comments dated 08.04.24 the Environment Agency have now also provided formal comments in relation to this matter.
4. In relation to comments made in relation to groundwater quality and the proposed borehole – the underlying geology at this location is the Weald Clay and, in our experience, the groundwater quality of this geological strata can vary significantly.
5. We note the comments from the agent in relation the proposed treatment, however with the above comments in mind the chemical and mineral content of the groundwater will affect the effectiveness of the treatment system. In our professional opinion it is crucial therefore that the chemical quality of the underlying groundwater is determined prior to determination and we have sufficient confidence that the treatment of the groundwater to a potable standard can be achieved through planning conditions, as required by the National Planning Policy Framework.
6. The above is consistent with our position on similar planning applications where a borehole or boreholes are proposed to supply potable water to a development.
7. We also note the comment '*The borehole prognosis report has confirmed that the site is not hydrologically linked to the Hardham site and thus a development which draws water from such a borehole would not have an impact on the Arun Valley site'.* Environmental Health are not qualified to comment on this matter – the LPA should seek independent technical advice on this and whether abstracting from the aquifer at this site will not have an impact on the Arun Valley site.
8. We have re-visited the information submitted in relation to the rainwater harvesting system and the amount of detail is welcomed, in our view some further detail is however required in this supporting information.
9. Finally, we note that reference is made to planning appeal APP/Z3825/C/23/3318225 in relation to planning application DC/21/1796. To clarify – similar to application currently under discission, Environmental Health formally objected to this application due to lack of supporting information in relation to water quality and proposed treatment. This application was however looking to source water from an on-site spring and not a rainwater harvesting system and so, in our view, is materially different to the current application under discission.

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| Given the above we remain of the view that the application is insufficiently detailed to be determined. We would however welcome dialogue with the applicant and/or their consultants on the above matters. | |
| **NAME:** | Kevin Beer and Penny Marsh |
| **DEPARTMENT:** | Environmental Health and Licensing |
| **DATE:** | 18/04/24 |