



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing – Pollution Team
REFERENCE:	DC/23/0189
LOCATION:	Sandgate Nursery, West End Lane, Henfield, West Sussex, BN5 9RD
DESCRIPTION:	Outline application for erection of a continuing care retirement community of up to 72 units of accommodation (Use Class C2) and up to 10 starter homes (Use Class C3) with associated community facilities including medical centre and on-site laundry and catering facilities, with access, infrastructure, open space, landscaping and associated works (all matters reserved except for access).
RECOMMENDATION:	Objection
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below documents: Aviron Associates Limited Preliminary Risk Assessment dated January 2023 Redmore Environmental Air Quality Assessment, dated 31 January 2023 Price and Myers Flood Risk, Drainage Strategy and Water Neutrality Report dated April 2032 Application is insufficiently detailed to be determined.	

MAIN COMMENTS:

Proposed Water Harvesting Scheme

Environmental Health have reviewed the Price and Myers Flood Risk Assessment & Water Neutrality Assessment dated April 2023, and we have the following comments to make.

1. We note the comments in sections 6.1.2 and 9 of the above-mentioned document that rainwater harvesting systems are proposed to supply water for the development, including potable water.
2. Rainwater harvesting schemes can be highly contaminated, to provide the LPA with sufficient confidence that the rainwater harvesting scheme 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 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.

Contaminated Land

We have reviewed the Aviron Preliminary Assessment dated January 2023 and we have the following comments to make.

1. As detailed in current guidance a preliminary risk assessment should include a review of previous site investigation reports and, with this in mind, we note that a Phase 1 Preliminary Assessment and Phase 2 Site Investigation Report (May 2015, RPS) was submitted in support of a previous planning application on this site, the latter of which detected elevated levels of chemical contamination. A review and summary of these reports, in particular the Phase 2 Site Investigation, should therefore form part of the current preliminary risk assessment
2. The Historical Maps and Envirocheck Report have not been included in the appendices of the report.
3. We ask that a full and updated version of the report, including the above information, is provided to the LPA.

Air Quality

We have reviewed the Redmore Environmental Air Quality Assessment, dated 31 January 2023, and we have the following comments to make.

Construction Impacts

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, which should incorporate Table 17 presented in the Air Quality Assessment.

Mitigation

All measures proposed should be costed. In addition, the *Sussex Air quality guidance* aims to avoid the duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, we would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, we would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies.

Instead, we would highly recommend improvements to existing cycling paths, and including cycle paths that meet up with current paths in the development design. We would support measures such as contributions to measures included in the Action Plan, contributions to Local Energy Efficiency Improvement; support towards HDC's public building energy performance retrofit programme; support towards HDC's vehicle replacement programme; promotion of public transport to residents through financial incentives.

Revise Emissions calculation according to 'Table1: Example emissions calculation' on *Sussex Air quality guidance*.

Road Transport Rural can be used for the Damage cost calculation.

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.

Summary

Given the above we are of the view that the application is currently insufficiently detailed to be determined. We would however welcome dialogue with the applicant and/or their consultants on the above matters.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	22/06/2023