

Horsham District Council  
Planning team  
Park House  
North Street  
Horsham  
West Sussex  
RH12 1RL

**Our ref:** HA/2026/127395/01  
**Your ref:** DC/25/0486  
**Date:** 19 January 2026

Dear Planning team (FAO: Alice Johnson),

**OUTLINE APPLICATION FOR THE DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF 9NO SELF-BUILD / CUSTOM BUILD DWELLINGS WITH ALL MATTERS RESERVED.**

**OAKHURST CENTRE, WEST CHILTINGTON LANE, CONEYHURST, WEST SUSSEX, RH14 9DN.**

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

**Environment Agency position**

We **object** to the planning application, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 187 of the National Planning Policy Framework.

**Reasons**

Our approach to groundwater protection is set out in [The Environment Agency's approach to groundwater protection](#). In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater, especially where the risks of pollution are high and the groundwater asset is of high value. In this case position statement G5 (Connection to public foul sewer) and A5 (Supply of adequate information) applies. Groundwater is particularly sensitive in this location because the proposed development site is located upon Secondary Aquifer A in connection with the neighbouring River Adur.

We consider that the proposed development poses an unacceptable risk of causing a detrimental impact to groundwater quality because as no information has been supplied on the foul drainage, and it could present a risk to controlled waters if it proposes to

discharge sewage to ground.

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed. In this instance the applicant has failed to provide this information and we consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to groundwater quality because the proposed development has not specified a foul drainage solution. Therefore, we cannot assess the risks that any proposed solution may cause to the controlled waters of the River Adur via the Secondary Aquifer underlying the site.

This is supported by our position statements outlined in [The Environment Agency's approach to groundwater protection](#):

- A2 - Precautionary principle
- A4 - Responsibility for assessments
- A5 - Supply of adequate information
- G5 - Connection to public foul sewer
- J3 - Take responsibility and adopt good practice

### **Overcoming our objection**

In accordance with [The Environment Agency's approach to groundwater protection](#) we will maintain our objection until we receive a satisfactory risk assessment that demonstrates that the risks to groundwater posed by this development can be satisfactorily managed.

The applicant should submit a Preliminary Risk Assessment (PRA) or drainage strategy that includes but is not limited to a details of how the development will dispose of foul drainage, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for assumptions and details.

This information must demonstrate to the satisfaction of the LPA that the risks to groundwater have been fully understood and can be addressed through appropriate measures.

Please consult us on any further information submitted, and we will respond within 21 days of receiving it.

If you have any queries regarding the above information, please do not hesitate to contact the advisor identified below.

Yours faithfully,

### **Environment Agency – Solent & South Downs**

Sustainable Places Advisor: Anna Rabone

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