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**Sent:** 10 February 2026 11:10  
**To:** Planning  
**Subject:** DC/25/2114

**Categories:** Comments Received

Dear Mr Holmes

I am writing to raise serious concerns regarding the Flood Risk and Drainage Assessment submitted in support of planning application DC/25/2114, and the associated risk of pollution to the water environment.

The Assessment confirms that the site is classed as having high groundwater vulnerability, indicating a limited capacity for natural attenuation of pollutants. Given the sloping nature of the site, this creates a clear and realistic pathway for contaminated water despite the inclusion including grey water arising from leaks, misconnections, or surface runoff, to migrate downslope via shallow subsurface flow and discharge into the stream located at the bottom of the site.

This stream is a tributary of a chalk stream, a habitat type recognised as internationally rare, ecologically sensitive, and effectively irreplaceable. Despite this, the application fails to adequately address the risk that everyday household pollutants — including detergents, cleaning chemicals, car-wash residues, pesticides, herbicides, fuels, oils and other hydrocarbons — could enter the watercourse either through surface runoff or groundwater pathways.

While the proposal refers to the use of a swale to manage surface water, a swale is not a sealed or fail-safe system. It is designed to slow and filter runoff, not to provide complete containment of pollutants. During heavy rainfall, overflow events, or in the event of leaks or misconnections, contaminated water can still pass through or beyond the swale and enter adjacent land or watercourses. As such, the presence of a swale cannot provide 100% assurance that polluted runoff would be prevented from reaching the nearby stream or sensitive wetland habitat.

Amongst a diverse assemblage of dragonflies associated with the watercourse, a Common Snipe (*Gallinago gallinago*), a species protected under the Wildlife and Countryside Act 1981, was recorded on Saturday 7 February. This provides further

evidence of the value and vulnerability of the habitat and reinforces the need for a precautionary approach.

A Common Snipe that is protected under the Wildlife and Countryside Act 1981 was recorded at the water's edge within this wetland area on Saturday 7 February using the Merlin bird identification application, supported by a date- and location-specific audio recording. While I recognise that a Merlin record does not replace a professional ecological survey, it nonetheless constitutes credible evidence of likely presence, particularly when considered alongside the clearly suitable wet grassland and wetland habitat present on site.

Common Snipe are strongly associated with damp and marshy ground and are highly sensitive to disturbance, drainage and habitat degradation.

The presence of a record at the lower end of the proposed development is therefore entirely consistent with known habitat preferences and demonstrates at least a reasonable likelihood of use of the site, which is sufficient in planning terms to trigger the requirement for further survey and a precautionary approach.

In the absence of site-specific breeding bird surveys and clear avoidance measures, the application fails to demonstrate that works would not result in disturbance or harm to a protected species or its habitat. Proceeding without adequately addressing this evidence risks non-compliance with wildlife legislation and national planning policy.

In the absence of clear, enforceable measures demonstrating that polluted runoff and grey water cannot enter this chalk stream tributary, the proposal fails to show that it would not give rise to unacceptable environmental harm or conflict with Water Framework Directive objectives.

Below is a diagram of Chalk Stream tributaries shown by Defra in blue with my wavy lines showing surrounding wetlands ....the red showing proposed site and yellow line showing slope.

Regards



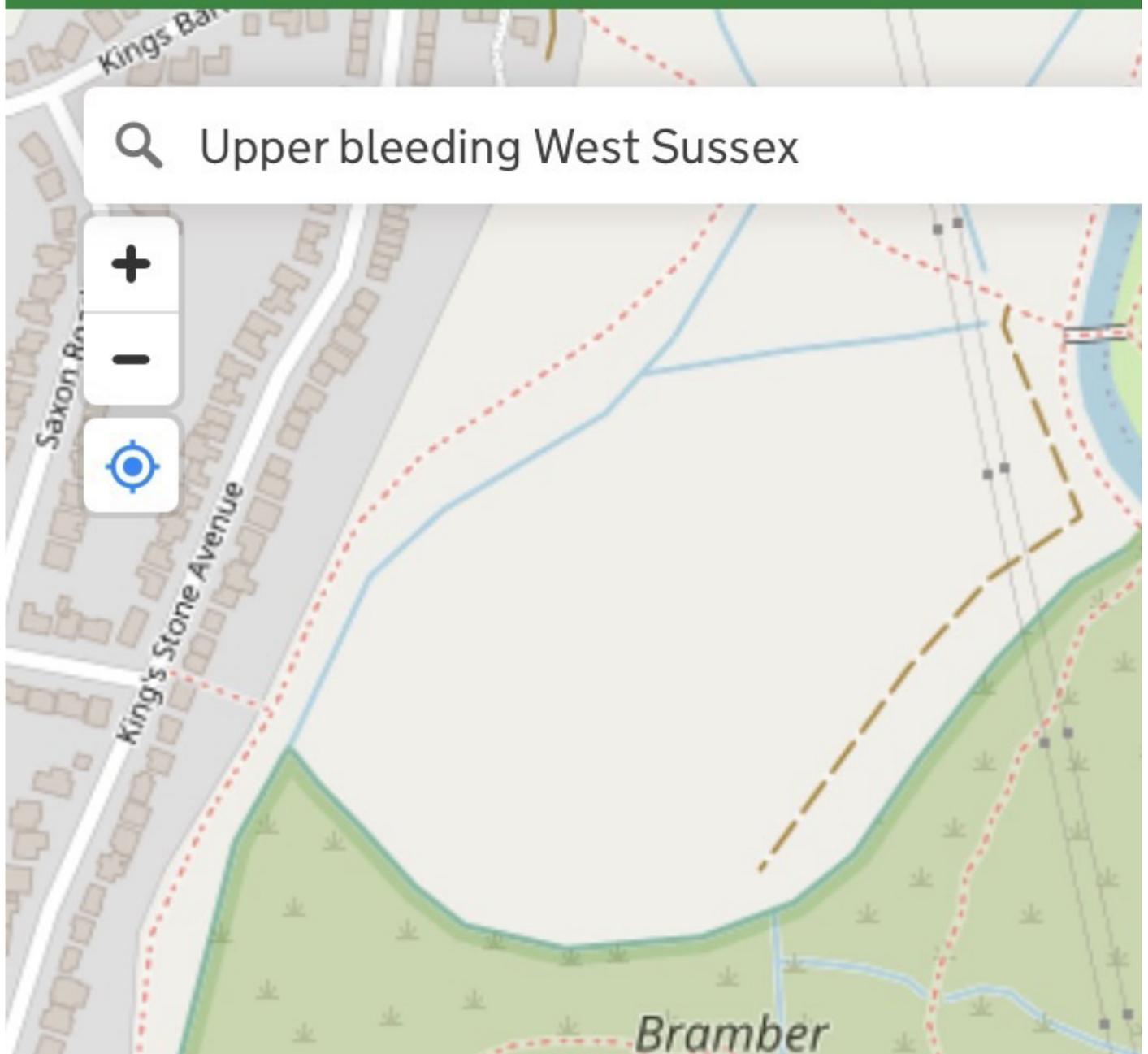
Oxcroft

Church Farm Walk

Upper Beeding



# Defra OGC preview



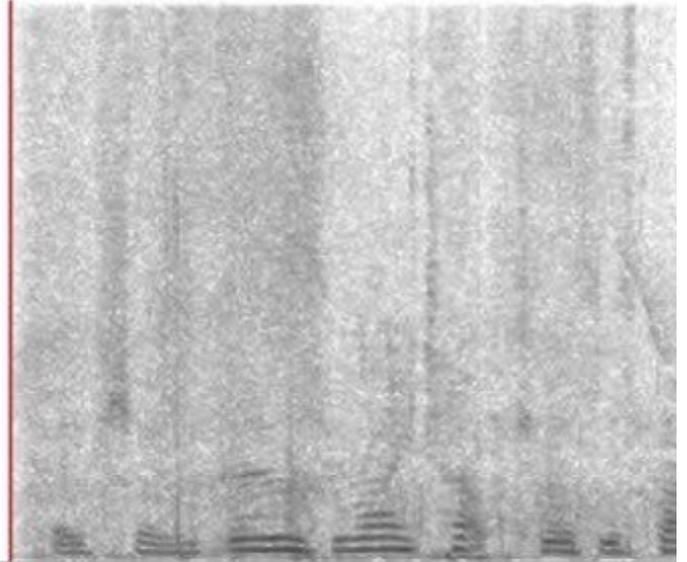
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Common Snipe 🌑



Carrion Crow



Eurasian Blackbird



Song Thrush



Sent from my iPad