

Horsham District Council - Development
Control
North Street, Horsham, RH12 1RL

Reference: PA-0008957/01
Customer reference: DISC/26/0217
10 August 2026

Application for Approval of Details Reserved by Condition 5 and 6 to approved application DC/25/1266.

Development at Hurst Road, Horsham, West Sussex.

Dear Planning Officer,

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

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

Environment Agency position

We have reviewed the submitted *Phase 1 Desk Study and Risk Assessment* (Compass Geotechnical, May 2026, J26-035-R01). We do not agree that the contamination conditions have been satisfied and **therefore object to the discharge of Conditions 5 and 6 at this stage.**

The submitted report is a Phase 1 Desk Study and Risk Assessment and does not provide sufficient evidence to demonstrate that contamination risks have been adequately characterised. The report identifies potential contaminant sources associated with the former fire station use, including heavy metals, PAHs, hydrocarbons, fuels and oils, asbestos, and potential PFAS contamination.

The report specifically acknowledges uncertainty regarding contamination associated with fire training activities and states that the extent of any potentially contaminative activities associated with the use of chemicals such as PFAS is unknown and cannot be wholly discounted. The report also concludes that the possible use of PFAS at the site cannot definitively be ruled out. Given the period during which the station was operational, and the widespread use of PFAS-containing firefighting foams since the mid to late 1970s, we consider there to be significant potential for PFAS to have been stored and used for training purposes at the site.

We have particular concerns regarding PFAS at this site given:

- Its strong association with firefighting foams and sites where these materials have been stored or used.
- Its known long-term persistence in the environment.
- Its ability to be retained within concrete surfaces and subsequently leach out over time.
- Its potential mobility in groundwater should it reach the water table.
- The very stringent environmental standards that apply to PFAS compounds (for example, the Environmental Quality Standard for PFOS in freshwater is 0.0004 µg/l).

Given the former fire station use and the recognised potential for PFAS contamination, we consider that PFAS must be included within the scope of any future site investigation. The contamination conditions should not be discharged until sufficient evidence has been provided to demonstrate that PFAS risks to controlled waters have been appropriately assessed. This will almost certainly require suitably rigorous soil and groundwater testing.

The report further identifies groundwater beneath the site as a High Vulnerability Secondary Aquifer and assigns groundwater a sensitivity classification of H1 (Very High). We also can see that some of the photographs appear to show cracking within the concrete hardstanding, which could provide potential pathways for contamination, including PFAS.

The proposed development includes a groundwater abstraction borehole and the information submitted identifies that such a borehole has already been installed on site. The report does not adequately consider whether potential historic contamination associated with the former fire station use, including PFAS, could affect the quality of water abstracted from this borehole. This further reinforces the need for an appropriately scoped intrusive investigation, including PFAS analysis, before contamination risks can be considered to have been adequately characterised. We would highlight that if any borehole is proposed to be utilised for potable water, then this site will be designated as a Source Protection Zone 1 and significantly increase the risk profile.

We note that the report identifies two stormwater interceptors within the site. However, the submitted information does not adequately demonstrate where these interceptors discharge or whether soakaways are present, either in association with these interceptors or elsewhere on the site. Consequently, potential contaminant migration pathways to controlled waters remain uncertain and the conceptual site model has not been sufficiently verified. No information has been provided regarding the condition of the interceptors, maintenance history, whether they remain in use, or whether they

contain potentially contaminated sediments or residues. Given the historic use of the site as a fire station, the interceptors may represent potential secondary sources of contamination and should be appropriately investigated as part of any future intrusive works.

Importantly, the report recommends intrusive investigation works, including boreholes to establish the thickness and extent of Made Ground, assessment of the ground gas regime, and laboratory testing for contamination. The report also recommends laboratory analysis for heavy metals, speciated PAHs, total petroleum hydrocarbons and asbestos, and notes that groundwater sampling may be required where groundwater is encountered. The report further advises that additional drilling and testing may be required should contamination be identified. We support these recommendations. However, the scope must also include soil and groundwater testing for PFAS.

As the submitted report itself recommends further investigation and identifies unresolved uncertainties relating to contamination sources, PFAS, groundwater and contaminant pathways, we consider that the contamination risk assessment remains incomplete. Accordingly, we recommend that the Local Planning Authority does not discharge any part of contamination condition(s) until a site investigation has been undertaken, the identified uncertainties discussed above have been resolved, and the findings have been submitted in a subsequent interpretative risk assessment for review by us.

Demolition works may be required to adequately undertake any ground investigation. If required, we would support rewording any pre-commencement condition to allow associated demolition work required to gain access to relevant areas of the site.

If you have any questions regarding our response, please contact planningssd@environment-agency.gov.uk.

Yours sincerely,

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