

Dear Neighbourhood Planning Team,

Thank you for consulting us on the Billingshurst Neighbourhood Plan.

Based on the environmental constraints within the area, we have no detailed comments to make in relation to the Plan.

However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>.

We have two advisory comments to make on the Plan, as set out below. It is not necessary to incorporate this information into the Plan, rather these comments contain guidance to be aware of:

- We note that Policy Bill 3 'Energy Efficiency in Design' refers to the use of ground source heat pumps as an option for utilising renewable energy. This is a commendable aim and can be supported. The only point to note in regard to ground source heat pumps is that ideally, they should be closed-loop systems.

We regulate open loop ground source heating and cooling schemes. Closed loop systems do not require any regulation by us. Any development that is proposing an open loop system will need the following:

- A groundwater investigation consent (under section 32(3) of the Water Resources Act 1991 (as amended)) to drill and test pumps;
- A full abstraction licence (under the Water Resources Act 1991 (as amended)) if the volume of groundwater abstracted is greater than 20 cubic metres a day; and
- An environmental permit (under the Environmental Permitting (England and Wales) Regulations 2016) to discharge water from the system, or an exemption if the criteria are met for the activity to be considered as low risk activity.

Further guidance can be found at: <https://www.gov.uk/government/collections/ground-source-heating-and-cooling-forms-and-guidance-notes>.

The Environment Agency Good Practice Guide relating to the installation and operation of open and closed loop ground source heating and cooling systems can be found on the Ground Source Heat Pump Association website at - [http://www.gshp.org.uk/pdf/EA\\_GSHC\\_Good\\_Practice\\_Guide.pdf](http://www.gshp.org.uk/pdf/EA_GSHC_Good_Practice_Guide.pdf).

- We fully support the aim in Policy Bill 5 'Burial Space' that any new burial space should have "no adverse impact on groundwater and surface water." For information, our guidance on cemeteries and burial space can be found here - <https://www.gov.uk/guidance/cemeteries-and-burials-prevent-groundwater-pollution>.

We will continue to work with partners to influence the Development Plan Documents in your area.

If you have any queries regarding the above, please do not hesitate to contact me.

*Kind regards,*

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