

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

Our ref: HA/2022/124474/01
Your ref: EIA/22/0003
Date: 22 September 2022

Dear Planning Team (FAO: Jason Hawkes),

**EIA SCOPING FOR PROPOSED DEVELOPMENT FOR APPROXIMATELY 700-800
NEW HOMES AND NEW SPORTS, LEISURE AND COMMUNITY FACILITIES.**

HORSHAM GOLF PARK, DENNE PARK, HORSHAM, WEST SUSSEX, RH13 0AX.

Thank you for consulting the Environment Agency on the above EIA Scoping.

We have reviewed the submitted EIA Scoping Report (prepared by Trium Environmental Consulting LLP, dated August 2022). Overall we are generally pleased with the scope of the report and the range of topics that have been proposed to be included within the Environmental Statement (ES).

We have a few comments which are set out below:

Deep bore soakaways

We note that deep bore soakaways are proposed to be utilised for this site to facilitate aquifer recharge and contribute to water neutrality (sections 22 & 23 of the Water Resources, Flood Risk and Drainage Topic Sheet).

The discharge of treated grey water to ground via boreholes will require an environmental permit from us under the Environmental Permitting (England and Wales) Regulations 2016. It should be noted that a permit is separate to and in addition to any planning permission granted. The granting of planning permission does not necessarily lead to the granting of a permit. To enquire about the permit application process, the applicant should contact our National Customer Contact Centre on **03708 506 506** (Monday to Friday 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk. We would advise the Applicant to contact us at the earliest opportunity. If a permit cannot be obtained for the proposed discharge to ground via boreholes, than an alternative method of disposal will be required.

We will only agree to the use of deep infiltration system for surface water or sewage effluent disposal if an applicant can show that all of the following apply:

- The discharge to groundwater is indirect (with the exception of clean

uncontaminated roof water to ground.

- There are no other feasible disposal options, such as shallow infiltration systems or drainage fields/mounds, that can be operated in accordance with the appropriate current British Standard 6297:2007 A1:2008.
- The system is no deeper than required to achieve sufficient soakage.
- Acceptable pollution control measures are in place.
- Risk assessment demonstrates that no unacceptable discharge to groundwater will take place – in particular that inputs of hazardous substances to groundwater will be prevented.
- There are sufficient mitigating factors or measures to compensate for the increased risk arising from the use of deep structures.

With regards to clean roof water, we have no objection to this being discharged to ground. However, surface water drainage from car parking areas and roads has the potential to contain pollutants and hazardous substances. We would expect a risk assessment to be carried out to determine the level of treatment required prior to the water from these areas being discharged to ground. We would like to direct the applicant to the Ciria SuDs manual C753 where industry best practice is provided. It provides further information and guidance on risk assessment and the likely level of treatment needed for such sites. This can be found at <http://www.susdrain.org/>.

Culverts

The applicant should consider whether there is any possibility of opening up or 'daylighting' existing culverts on site. Daylighting culverts provides multiple benefits in terms of biodiversity net gain and reducing flood risk.

Pollution prevention

All precautions must be taken to avoid discharges and spills to the ground both during and after construction. Guidance on pollution prevention for businesses can be found on the gov.uk website here –

<https://www.gov.uk/guidance/pollution-prevention-for-businesses>.

The applicant should note that in the event of a pollution incident, works should cease immediately and the Environment Agency should be contacted via our incident hotline **0800 80 70 60** (24-hour service).

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: [REDACTED]

[REDACTED]

[REDACTED]

End