

Guildford Borough Council
Development Control
Millmead House Millmead
Guildford
Surrey
GU2 4BB

Our ref: WA/2025/132766/01-L01
Your ref: 25/P/01521
Date: 05 December 2025

Dear Sir/Madam

Outline Planning Application With All Matters Except For The Accesses From Guildford Road And Wyke Lane Reserved, For Subsequent Approval For The Demolition Of The Existing Buildings And Hardstanding And The Erection Of Up To 200 Residential Dwellings Including Affordable Housing And Plots Of Self-Build Plots (Class C3); Green And Blue Infrastructure And Associated Service And Utility Structures.

Shortlands Farm, Guildford Road, Ash, Guildford, GU12 6DF

Thank you for consulting us on the above application on 4th December 2025.

Environment Agency position

The current or previous use(s) of the development site relating to a former piggery and animal processing suggest that the land may be affected by contamination. Land contamination can harm human health, soils, ecosystems, property, drinking waters supplies, groundwater and surface water.

Land contamination is a material planning consideration. The planning decision should ensure that the site is suitable for its proposed use, considering any risks from contamination and any proposed land remediation. The planning application should therefore be supported by adequate site investigation information, prepared by a competent person. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. This approach is supported by paragraph 196 of the National Planning Policy Framework.

The previous use(s) of the site may present an unacceptable risk of contamination that could be mobilised during site works and construction, potentially leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A.

On 25 March 2025, we published updated Flood Zones alongside other datasets for use in development. Planners and flood risk professionals – find out more at [Development planning \(including Flood Map for Planning\)](#). Guidance for developers is available through the Town and Country Planning Association [New national flood and coastal erosion risk information - Town and Country Planning Association](#)

The proposed development will be acceptable, if a planning condition is included requiring the submission and validation of a detailed land contamination management strategy for unsuspected contamination during the enabling, construction and/or development works. By cleaning up land contamination, it will be helping to protect and improve the groundwater quality that supports existing drinking water supply, future supply of drinking water and other environmental uses.

Without this condition we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate or will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason

This condition seeks to ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraphs 187 and 196 of the National Planning Policy Framework.

Informative

Where a site is affected by contamination responsibility for securing a safe development rests with the developer and/or landowner. Developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the contaminated land pages on gov.uk for more information

Other Consents – advice to applicant

As you are aware we also have a regulatory role in issuing legally required consents, permits or licences for various activities. We have not assessed whether consent will be required under our regulatory role and therefore this letter does not indicate that permission will be given by the Environment Agency as a regulatory body.

The applicant should contact 03708 506 506 or consult our website to establish if consent will be required for the works they are proposing.

Final Comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us.

As you are aware, the discharge and enforcement of planning conditions rests with your authority. You must therefore be satisfied that the proposed condition meets the requirements of the 6 tests in paragraph 57 of the NPPF.

Please notify us immediately if you are unable to apply our suggested condition, to allow further consideration and advice.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me. Please quote our reference number in any future correspondence.

Yours faithfully

Miss Chloe Alma-Daykin
Planning Advisor

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