

This application process has felt like a small village battle against a big corporate company.

The balance of the 3 key planning objectives (Economic, Social and Environmental) have not in our view met by this application.

Economic

Firstly the high cost of £20K / Staplefield resident is not value for money or justifiable to the Staplefield resident . There is a planned 91% increase in water bills (Southern Water were the highest in the UK) according to recent figures submitted to Ofwat. As a private company the costs are inevitably passed on to customers at some stage. The fact that Southern Water has not shown evidence of having undertaken a detailed evaluation of alternatives , nor shared a business case outlining value for money with residents in spite of residents many requests, suggests other alternatives have not been adequately assessed.

Social

The social capital of this application for Staplefield residents includes poor communication of a scheme riddled with errors with no consultation, evasive communication and no specific benefits to Staplefield residents that could not be achieved by other methods on the existing site. These would not affect the setting of listed buildings, affect the context of the historic forge and WW11 pill box , alter the profile and sense of place of AONB, destroy habitats of existing wildlife e.g. dormice and great crested newts amongst many. It seems to be a needless sacrifice of a special place that we should be protecting.

Environment

Whilst the presence of water and intense planting will always attract an increase in biodiversity this is at a cost of destroying existing wildlife and habitat, altering both the profile and context of the AONB which is highly visible from its roadside location.










The planning committee decision will change our special rural rolling patchwork field landscape forever when other options are available. 99% of




the other 7078 UK sewage treatment works have implemented alternatives to reach the improved phosphate levels to be introduced in December 2024. This scheme does not protect our environment. It destroys all existing wildlife to create a manmade highly engineered landscape that does not reflect the character of this rural area with hard landscaped wide pathways that give an urban look in a rural setting. These should be removed as a condition of planning permission at the very least, as the farmer has full legal access to his fields 100 m away and Southern Water have indicated that there is no requirement for this feature beyond the Farmer's preference.

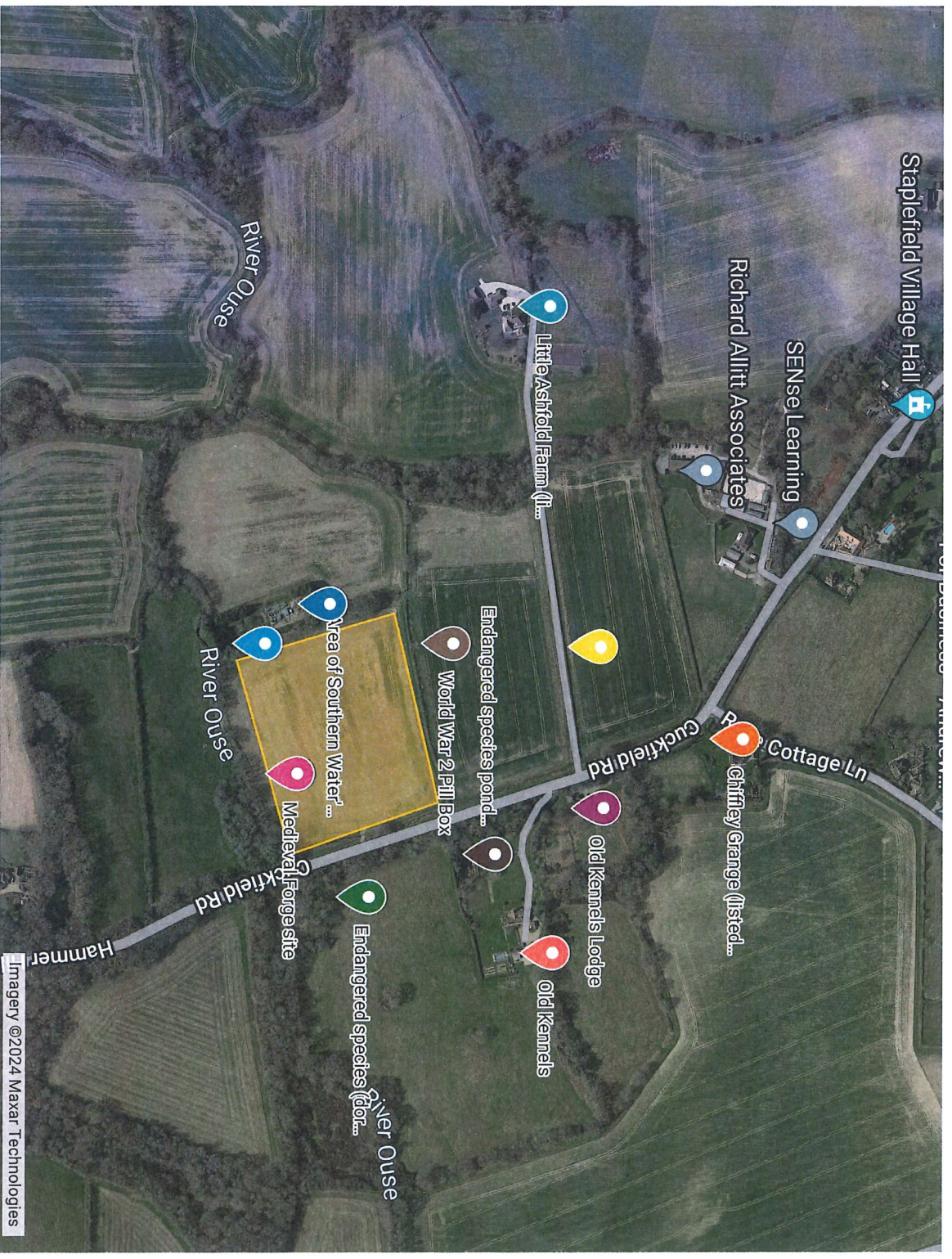
For these reasons we ask the Planning Committee to please defend the little person and the unique character of the Staplefield rural environment - its gentle sloping patchwork of fields so characteristic of the High Weald AONB. There are other schemes to achieve the same outcome.

Staplefield map of proposed engineered wetland

Impact points for Staplefield engineered wetland

-  Little Ashfold Farm (listed building)
-  Chiffley Grange (listed building)
-  Old Kennels
-  Alternate Access to fields (Farmer has full legal access rights)
-  Old Kennels Lodge
-  Existing Wastewater Treatment Plant
-  Existing car parking for minimum 6 cars
-  Endangered species pond (great crested newts)
-  Endangered species (dormice & bats)

-  World War 2 Pill Box
-  Medieval Forge site
-  Area of Southern Water's proposed engineered wetland



Proposed engineered wetland with impacts on adjoining land

WSSC/007/24 Staplefield Wetland

Objections summary:

We have **3 major** objections and a set of comments against this application and they are:

Objections

1. We believe that **this site is not suitable** site given the area that it is an Area of Outstanding Natural Beauty, contains endangered species, contains archaeological sites and is close to a listed buildings
2. We believe **Southern Water have not conducted the planning process correctly in line with regulations**. Under WD6 there is no data or evidence of alternatives despite multiple requests and engagement from Southern Water has been limited to late in the process. This is the same for the Biodiversity claims for which there is also no data submitted. This data should be time-framed to show that the site will be adversely affected for three years and then start to recover once the planting starts coming to fruition. We request an extension for 1-2 months for further engagement with the village on data relating to alternatives and to provide further time for residents to input to the design.
3. We believe that **the roadway in the plan is unnecessary** and inappropriate to the proposal as there is currently alternative access for the farmer less than 100m away which may not have been made clear to the applicant. It gives an urban feel to a rural environment. We believe that removing the roadway from the design would very meaningfully improve residents perception of the development, and would view the proposed development much more positively as a result.

Comments should this application be, unfortunately, accepted:

- (i) **Please ensure that size of works does not exceed** the maximum requirement for the number of residents in Staplefield.
- (ii) **Please ensure** that there is **No signage** to the site **as now**. Identification of the site for deliveries can be by Sat Nav and What3words.
- (iii) **Please ensure that all gaps in the hedging are filled** in with full height hedging of a similar type.
- (iv) **Please ensure that nothing is visible above the hedge height.**
- (v) **Please ensure the correct planting** (it is not correct in the application) to **ensure that only plants native to Sussex** are planted.
- (vi) **Please ensure that there is time limited working** – only 8 to 5 Monday to Friday with completion to be within 6 months of application being approved.

Southern Water Errors and Omissions to Planning Application

1. **Southern Water:** Front page states NO parking and No endangered species nearby.

The Truth: There is parking for 7 cars in the existing waste water works and Great Crested Newts and Palmate Newts are present 30 m away.

2. **Southern Water:** Planning consideration page 12 of 23 states NO suitable alternative is available.

The Truth: This is simply not true. Cecile Stanford project Manager Southern Water told us Southern Water had shortlisted several sites to try this wetland approach and Staplefield was the most suitable. This application is not on the basis that “ no suitable alternative site are available” - the existing site can be upgraded to achieve the required phosphate level water quality requirement. See attached comparison information between engineered wetland and Soneco P system which is not experimental in Sussex, carries less risks than the wetland and is considerably cheaper for all bill payers. As of 8th May 2024, Southern Water haven't even contacted Power & Water, but have issued untrue and inaccurate comments about why they don't want to use it.

3. **Southern Water:** Desk based study reports sparse wildlife.

The Truth: In reality 30 m away we have Great Crested Newts, Palmate Newts, Dormice, 3 owl species, grass snakes, badgers, foxes, frogs, toads, orchids, etc. This makes any improvement from the desk based study look more extreme than the reality.

4. Visual Impact **Southern Water:** Old Kennels (wrongly referred to as Bridge House) visual impact shown from 200 m away. Old Kennels Lodge (nearest property to the site completely missed off plan)

The Truth: Reality is there is a clear 6 window diagonal view across the site **from both buildings**

5. Planting details **do not include filling large roadside gaps.**

This will be a brown hillock site of 4 cells which will take 2 growing seasons (2024 – 2027 – planting not possible until May 2025) to establish and become greener. Profile from busy road will be 2m high brown hills which is a visibly very different landscape to High Weald ANOB landscape.

Also **some tree species not suitable for wetland conditions.** Seed mix **not the best choice** .

6. Forge and WW2 **historically sensitive sites scoped out of the plan** and yet a special feature of the area. Also ancient pathways are not shown .

7. **Southern Water:** Landscape roadways. We are told the farmer needs access to his land and needs a wide track.

The Truth: This is not necessary as farmer has full legal access on alternative track 100m away.

8. **Southern Water:** “Midges and mosquitoes are inherent in any water body “(quote Southern Water) and remain a possible risk to health and safety of nearby residents that does not exist at present.

The Truth: The Soneco P system installed on current water treatment site does not have this risk to local residents’ Health & Safety not just from air borne disease and other issues, but also from the potential of people or animals falling into the pools. Similarly Southern Water have not carried out a robust, detailed and costed analysis of the alternative options (Soneco P and Biological Nutrient Removal) and shared these details with the Planning Officer, the Planning Committee and the residents of Staplefield.

Comments highlighting all the breaches of Planning Regulations from the West Sussex County Plan in the Southern Water application for planning permission for an engineered wetland in Staplefield

W3 – Location of Built Waste Management Facilities

a. Proposals for built waste management facilities, on unallocated sites, to enable to transfer, recycling, and recovery of waste will be permitted provided that:

i. It can be demonstrated that they cannot be delivered on permitted sites for built waste management facilities or on the sites allocated for that purpose in Policy W10; and

ii. They are located in the Areas of Search along the coast and in the north and east of the County as identified on the Key Diagram; or

iii. Outside the Areas of Search identified on the Key Diagram, they are only small-scale facilities to serve a local need.

b. Proposals that accord with part (a) must:

i. Be located within built-up areas, or on suitable previously developed land outside built-up areas; or o

ii. Be located on a site in agricultural use where it involves the treatment of waste for reuse within that unit; or

iii. Only be located on a greenfield site, if it can be demonstrated that no suitable alternative sites are available; and

iv. Where transportation by rail or water is not practicable or viable, be wellrelated to the Lorry Route Network; large-scale facilities must have good access to the Strategic Lorry Route.

c. Proposals for new facilities within the boundaries of existing waste management sites to enable the transfer, recycling, and recovery of waste, will be permitted unless:

i. The current use is temporary and the site is unsuitable for continued waste use; or

ii. Continued use of the site for waste management purposes would be unacceptable in terms of its impact on local communities and/or the environment.

It can clearly be demonstrated that the existing wastewater treatment works in Staplefield can be used for alternative options, if Southern Water had fully clearly and transparently explored the alternative options with the suppliers of those systems. Southern Water have not done this and despite many requests over 3 months have not supplied any evidence that a robust, detailed and costed approach has been carried out.

W6 – Management of Wastewater and Sewage

a. Proposals for the management of wastewater and sewage sludge will be permitted provided that:

i. Where possible, new facilities are accommodated within existing wastewater treatment sites; or ii. Where new facilities cannot be accommodated within existing sites, they are located on suitable previously developed land or on existing, permitted, or allocated sites for built waste management facilities or general industrial uses.

b. Where location of the proposal in accordance with part (a) of this policy is not feasible in operational terms or is inappropriate for other reasons, proposals for the management of wastewater and sewage sludge will be permitted provided that: i. The proposal is necessary to support new development; or

ii. It is required to meet environmental standards or regulatory provisions.

This can be clearly demonstrated but Southern Water have not fully, clearly and transparently assessed the alternative options with the suppliers of those systems and have supplied no evidence that a robust, detailed and costed approach has been carried out.

W11 – Character Proposals for waste development will be permitted provided that they would not have an unacceptable impact on:

- a. The character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics); and
- b. The separate identity of settlements and distinctive character of towns and villages (including specific areas or neighbourhoods) and development would not lead to their actual or perceived coalescence.

This proposal is in an ANOB and is also near to listed buildings and is out of character with the patchwork of gentle rolling fields that is a feature of the High Weald.

W12 – High Quality Development Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) take into account the need to:

- a. Integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities;
- b. Have regard to the local context including:
 - i. The varied traditions and character of the different parts of West Sussex;
 - ii. The characteristics of the site in terms of topography, and natural man-made features;
 - iii. The topography, landscape, townscape, streetscape and skyline of the surrounding area;
 - iv. Views into and out of the site; and v. The use of materials and building styles;
- c. Includes measures to maximise water efficiency;
- d. Include measures to minimise greenhouse gas emissions, to minimise the use of non-renewable energy, and to maximise the use of lower-carbon energy generation (including heat recovery and the recovery of energy from gas); and
- e. Include measures to ensure resilience and enable adaptation to a changing climate.

The topography and landscape are altered by the highly engineered alien landscape proposed.

W13 – Protected Landscapes

a. Proposals for waste development within protected landscapes (the South Downs National Park, the Chichester Harbour Area of Outstanding Natural Beauty (AONB), and the High Weald AONB) will not be permitted unless:

- i. the site is allocated for that purpose in an adopted plan; or
- ii. the proposal is for a small-scale facility to meet local needs that can be accommodated without undermining the objectives of the designation; or
- iii. the proposal is for major waste development that accords with part (c) of this Policy.

b. Proposals for waste development located outside protected landscapes will be permitted provided that they do not undermine the objectives of the designation.

c. Proposals for major waste development within protected landscapes will not be permitted unless:

- i. there is an overriding need for the development within the designated area; and
- ii. the need cannot be met in some other way or met outside the designated area; and
- iii. any adverse impacts on the environment, landscape, and recreational opportunities can be satisfactorily mitigated.

The site is not allocated for the purpose of development in an adopted plan

There is no overriding need with alternative better, cheaper and more efficient solutions available

W14 – Biodiversity and Geodiversity Proposals for waste development will be permitted provided that:

a. areas or sites of international biodiversity importance are protected unless there are no appropriate alternative solutions and there are overriding reasons which outweigh the need to safeguard the value of sites or features, and provided that favourable conservation status is maintained;

- b.** there are no adverse impacts on areas or sites of national biodiversity or geological conservation importance unless the benefits of the development clearly outweigh the impact on the objectives of the designation and on the wider network of such designated areas or sites;
- c.** there are no adverse impacts on areas, sites or features of regional or local biodiversity or geological conservation importance unless the benefits of the development clearly outweigh the impact on the objectives of the designation;
- d.** where development would result in the loss of or adversely affect an important area, site or feature, the harm is minimised, mitigated, or compensated for, including, where practicable, the provision of a new resource elsewhere which is of at least equivalent value;
- e.** where appropriate, the creation, enhancement, and management of habitats, ecological networks, and ecosystem services is secured consistent with wider environmental objectives including Biodiversity Opportunity Areas and the South Downs Way Ahead Nature Improvement Area; and
- f.** where necessary, the investigation, evaluation, and recording of important sites and features is undertaken and, where appropriate, representative features are preserved.

The proposal cannot be accommodated without undermining the objectives of the Area of Outstanding Natural Beauty (ANOB)

There are viable, cheaper and more effective alternatives, but Southern Water have not provided any evidence of any of the alternatives, but have in fact provided some false and misleading information

W15 – Historic Environment Proposals for waste development will be permitted provided that:

- a.** known features of historic or archaeological importance are conserved and, where possible, enhanced unless there are no alternative solutions and there are overriding reasons which outweigh the need to safeguard the value of sites or features;
- b.** it would not adversely affect currently unknown heritage assets with significant archaeological interest; and where appropriate, the further investigation and recording of any heritage assets to be lost (in whole or in part) is undertaken and the results made publicly available.

This application would adversely affect currently known heritage assets specifically a Medieval Forge that is in the middle of the proposed engineered wetland and a WW11 pill box less than 50 m away

W16 – Air, Soil and Water Proposals for waste development will be permitted provided that:

- a. There are no unacceptable impacts on the intrinsic quality of, and where appropriate the quantity of, air, soil, and water resources (including ground, surface, transitional, and coastal waters);
- b. There are no unacceptable impacts on the management and protection of such resources, including any adverse impacts on Air Quality Management Areas and Source Protection Zones;
- c. The quality of rivers and other watercourses is protected and, where possible, enhanced (including within built-up areas); and
- d. They are not located in areas subject to land instability, unless problems can be satisfactorily resolved.

This is an experimental proposal and therefore the potential impacts on air, soil and water in the West Sussex climate and environment are unknown

W17 - Flooding

- a. Proposals for waste development will be permitted provided that:
 - i. Mitigation measures are provided to an appropriate standard so that there would not be an increased risk of flooding on the site or elsewhere;
 - ii. They are compatible with Shoreline Management Plans and/or Catchment Flood Management Plans and the integrity of functional floodplains is maintained;
 - iii. Appropriate measures are used to manage surface water run-off including, where appropriate, the use of sustainable drainage systems (SUDS); and
 - iv. They would not have an unacceptable impact on the integrity of sea, tidal, or fluvial flood defences, or impede access for future maintenance and improvements of such defences.
- b. Proposals for waste development in 'areas at risk of flooding' will not be permitted unless they pass the Sequential Test and, where applicable, the Exception Test set out in national policy.

Southern Water have an increasingly poor record in pouring raw sewage overflows into the River Ouse. There are NO measures to combat that in any way in this application.

W18 - Transport Proposals for waste development will be permitted provided that:

- a. Where practicable and viable, the proposal makes use of rail or water for the transportation of materials to and from the site;
- b. Transport links are adequate to serve the development or can be improved to an appropriate standard without an unacceptable impact on amenity, character, or the environment; and
- c. Where the need for road transport can be demonstrated:
 - i. Materials are capable of being transported using the Lorry Route Network with minimal use of local roads, unless special justification can be shown;
 - ii. Vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network;
 - iii. There is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of all road users;
 - iv. Satisfactory provision is made for vehicle turning and parking, manoeuvring, loading, and, where appropriate, wheel cleaning facilities; and
 - v. Vehicle movements are minimised by the optimal use of the vehicle fleet.

There is a long term legally binding alternative access for the farmer to access fields behind this development and so there is NO NEED for any hard landscaped roadway across the site giving an urban feel to a rural landscape

W19 – Public Health and Amenity Proposals for waste development will be permitted provided that:

- a. Lighting, noise, dust, odours and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity;
- b. The routes and amenities of public rights of way are safeguarded, or where temporary or permanent re-routing can be justified, replacement routes of comparable or enhanced amenity value are provided; and

c. Where necessary, a site liaison group is established by the operator to address issues arising from the operation of a major waste management site or facility.

This is an experimental proposal and the first of its kind in West Sussex it is currently impossible to say that there will not be unacceptable emissions from the site.

However there will definitely be unacceptable Noise, Dust, Odours and other unhealthy emissions during the construction of the engineered wetland

W23 – Waste Management within Development Proposals for development will be permitted provided that:

a. The waste generated during construction, demolition and excavation is minimised and that opportunities for re-using and recycling of waste are maximised; and

b. Waste management facilities of an appropriate type and scale are an integral part of the development

There are already waste management facilities of an appropriate scale alongside the site for this proposed development which should be upgraded to meet Government Phosphate reduction targets.

Southern Water comparison of options for the

	"Wet land"
Tried & Tested	No
Maintains AONB	No
Changes landscape	Yes
Destroys existing wildlife habitat	Yes
Destroys existing endangered species	Yes
Reduces Carbon Footprint	Yes
Increases traffic through village	Yes
Could lead to smells	Yes
Raw sewage overflows into the River	Unchanged
Archaeological site destruction	Yes
Historic buildings encroachment	Yes
Nesting season impact on trees & hedgerows	Yes
Major noise and disruption during works	Yes
Years to be completed with full planting	3 years
Cost	£4,300,000
Annual energy usage	£5,000

Why have Southern Water not fully investigate

Staplefield Treatment works

Biological Nutrient Removal	Soneco P
Yes	Yes
Yes	Yes
No	No
No	No
No	No
Yes	Yes
No	No
No	No
Unchanged	Unchanged
No	No
No	No
No	No
No	No
0 years	0 years
TBC	£300,000
TBC	£4,600

ed and reviewed these other system

