

5<sup>th</sup> June 2024

Edward Anderson & Michael Elkington  
County Planning  
West Sussex County Council  
County Hall  
Chichester  
PO19 1RH

**Reference:** Planning Application Number WSCC/007/24 – Installation of Integrated Constructed Wetlands (ICW) and associated infrastructure at land adjacent to Staplefield Wastewater Treatment Works (WTW)’ ---- **Staplefield WTW - Further Information Submitted - Re-consultation’**.  
‘APPLICATION MADE UNDER WASTECOUNTY COUNCIL DEVELOPMENT APPLICATION – FURTHER INFORMATION’,

Dear Mr Anderson and Mr Elkington,

We write regarding the Southern Water’s update to their application WSCC/007/ dated 13<sup>th</sup> May 2024, which we object to. The objections are listed below in section C and are in addition to those we raised initially in our letter on 6<sup>th</sup> March 2024, now attached as an Appendix, which still apply. There are shortcomings in the planning application, and they must be addressed:

**C.1 - Impact on natural environment including animals, protected species and their habitat:  
The *Ecological Impact Assessment RevB.pdf* report**

- A proper detailed wildlife field survey is needed over a set period. This is not dealt with satisfactorily in the re-consultation. The development site is in an AONB and for millennia animals have been living here. It is incredibly disappointing that only a desk study has been carried out – this site deserves more than this. We need to know precisely what the protected species are in this area via monitoring e.g. camera traps. it’s our duty, enshrined in law, to protect them & other species (bats, barn owls, door mice) under the Wildlife & Countryside Act 1981. This needs to be addressed as all these animals call this area their home.
- On 3 May, I photographed the following Palmate Newt, after dark, on the road going to Little Ashfold Farm, directly above the development site:



**C.2 - Effect on historic features such as listed buildings/conservation areas:**

***Historic Environment Desk Based Assessment RevE Part 1.pdf* report**

A full historic environmental field survey is needed. This is not dealt with satisfactorily in the re-consultation. This is an area of outstanding ancient history as we outlined in our original feedback – see appendix. It must not be airbrushed away. For example, in preparation for D-Day 1944, Canadian soldiers were billeted in the Little Ashfold Farm area, potentially on the development site, so why hasn't a proper archaeological field study been done? This needs to be addressed. It's interesting to observe that the planning re-application closes on 6 June 2024, 80 years from the D-Day invasion!

**C.3 Layout/appearance/design of buildings:**

The new amended & proposed car park & track is not needed. Both don't exist now and are not required to service the five ponds. There is a sufficient access route and parking already. To put simply this is an AONB not an industrial landscape, which is what it would look like. This needs to be addressed.

**C.4. Health & Safety:**

Where is the component on the application that deals with the health & safety of five huge deep ponds of about 5.7 acre site? How can they be protected from a planning standpoint as there appears no safeguarding to them. This needs to be addressed.

**C.5 Untreated Sewage Spills:**

There is a confusion as the Southern Water Directors said on their video call that there would be no raw untreated sewage spillage into the ponds, however their design consultant from the company in the Republic of Ireland (Dunhill village site), who designed the wetland, said at the Staplefield village hall meeting it was possible and it was 'okay' because the sewage will fall to the bottom of the ponds. Clearly this would not be okay. Their opinions differ so must validated from a planning perspective. This needs to be addressed.

**C.6 Failure to adequately address Policy W6:**

Instead of looking at all options initially and presenting them, as is their obligation, Southern Water have presented a single choice only which is an ICW. They have been asked but shown no evidence of doing due diligences on the simpler easier solutions. We know they can upgrade the existing plant machinery to achieve the same result, without digging a ICW, because they are doing that at their Horsham / Southwater Sewage plant currently. To this stage, it has taken 18-24 months at least of work on application WSCC/007/24, and probably at huge cost with so may different contractors involved, none the less it does now feel that the planning application must be revisited from the start to deal with this key factor. This needs to be addressed.

We would be grateful if these matters could be taken into consideration in the determination of the application.

Yours sincerely,

Mr & Mrs N. Oakden,



## Appendix – Objections from letter date 6<sup>th</sup> March 2024

A.1, A2. & B. 1. to B.10 below.

The Staplefield WTW it is understood to process sewage for 200 to 230 people in the village, so this is truly a 'sledgehammer to crack a nut' project along with a £2.4 million price tag. Unless of course there is a bigger picture, and this is just the start. Could the project be any more ironic when on one hand it's aiming to keep the rivers clean but on the other achieving it by digging up nearly six acres of ancient green belt land.

It appears the application has been worked on for at least eighteen months prior to us being first notified on 12<sup>th</sup> February 2024.

### **A. 1 Comments:**

Mott MacDonald were commissioned to explore wastewater management options, but it is felt they did not mention or explore a valid third option in the *Construction Environment Management Plan.pdf*. This should be addressed and is outlined as an additional Option 3 below. Also, there are comments against Option 1:

**Option 1:** A chemical plant.

**Comment:** This would need two new units to process the water and the technology to do it is available right now. Southern Water are currently upgrading their *Southwater Bypass* site in Horsham – see link - using it, so why can't this be done to the much smaller Staplefield WTW, servicing 230 people? Horsham has a population of about 142,000 people: [www.southernwater.co.uk/the-news-room/the-media-centre/2022/december/work-starts-on-a-28-million-pound-upgrade-to-horsham-wastewater-treatment-works](http://www.southernwater.co.uk/the-news-room/the-media-centre/2022/december/work-starts-on-a-28-million-pound-upgrade-to-horsham-wastewater-treatment-works)

Southern Water admits it can add industrial equipment rather than impacting a green belt setting experiment. It is also 100% viable and seemingly the easiest choice and could have been acted on 18 months ago when the project started.

**Option 2:** An Integrated Constructed Wetland (ICW).

**Comment:** We object this proposal.

**Option 3:** Pump Sewage to other locations.

**Comment:** the third option, which Mott MacDonald did not include, is to shut the Staplefield WTW and pump the raw sewage to another works e.g. Balcombe, about 3 miles away. To a twenty-year horizon the total costs of this option might well be competitive. It's understood that there may also be a works at Handcross which will be nearer. Why has this other option not been explored? This must be addressed.

### **A.2**

**These are other shortcomings in the application and must be addressed:**

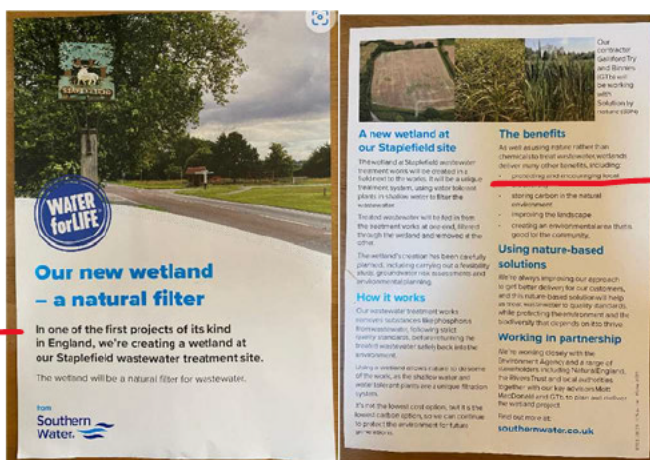
- There is a multitude of information largely based on the construction and long-term environmental impact, which is minimal. Everything is about the reed beds and the field. No information is available and can be found about the changes to the existing Staplefield WTW. Why not? What are they? There must be some needed. This needs to be addressed.
- There are no elevation or footprint details concerning the MCC and pump other than the flow is 4 l/s. Why not? It needs to be understood and what the impact is e.g. will there be a kiosk? This needs to be addressed.

- Southern Water should have commented about pump noise and any change of odour in their report. They have not, why not? This needs to be addressed.
- Operationally what happens if the pump fails? Are Southern Water installing a duty/standby pump arrangement? This needs to be addressed.
- If the pump fails, will Southern Water fail consent for the period of failure? This needs to be addressed.

**B. Planning Application Feedback using the suggested subject headings in WSCC letter dated 9 February 2024:**

**1. Suitability of use for the area:**

- It's a green belt field so is unsuitable for any type of industry.
- It's the High Weald rural area & should be a protected site.
- To turn a 5.7-acre field, which is sixteen times the size of the current Staplefield WTW, is completely disproportionate to service only 200 to 230 people.
- Southern Water admit the following – see their leaflet below – so is Staplefield, known as the 'pearl of Sussex' the right location to find out if their experiment works.
  - *'in one of the first projects of it's kind in England'*
  - *'it will be a unique treatment centre'*



- Staplefield has had the highest rain fall in a February for twenty years at nearly 160mm, so being on an already steep gradient, there is no mitigation taken for flooding of the site from the north. The road on the north side of the River Ouse bridge floods during the winter currently so that needs addressing as it would become unpassable.

**2. Loss of light/outlook/privacy:**

- The view south across the Ouse valley, towards Holmsted Manor RH17 5JF will be negatively changed & ruined.

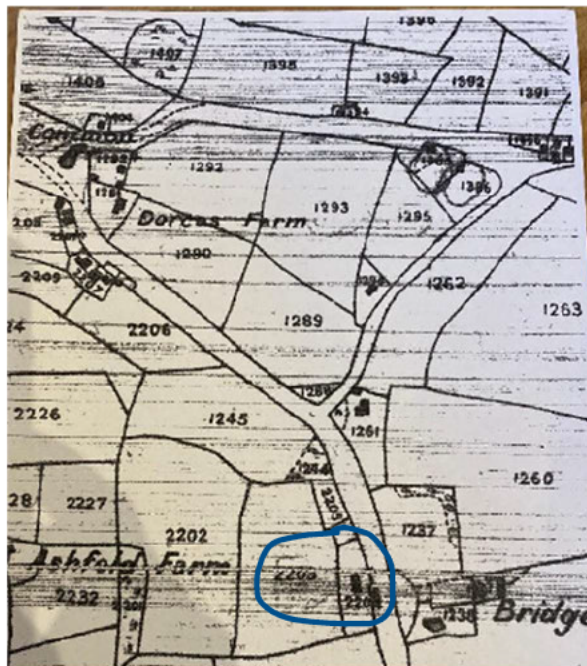
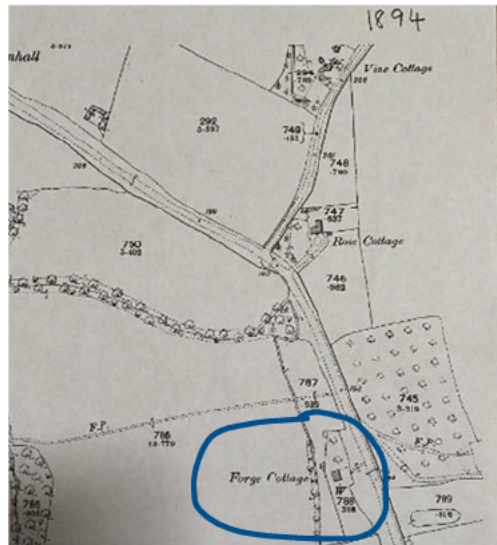
**3. Effect on historic features such as listed buildings/conservation areas:**

- Impact on a Grade II listed building. Chiffley Grange is grade listed II property and our curtilage is 175 metres to the north boundary of the application. It is believed the listing has not been taken into consideration appropriately.
- There was an ancient property in the field above the application called **Forge Cottage**, which is missing from the *Historic Environment Desk Based Assessment* reports. It is shown on the historic maps of 1874 & 1894 and is also shown on the Tithe map of about 1836. In addition, this property has a well (marked W below) which still appears to be active. In section 4.4.5 on page 20 of 51 of the same pdf it is

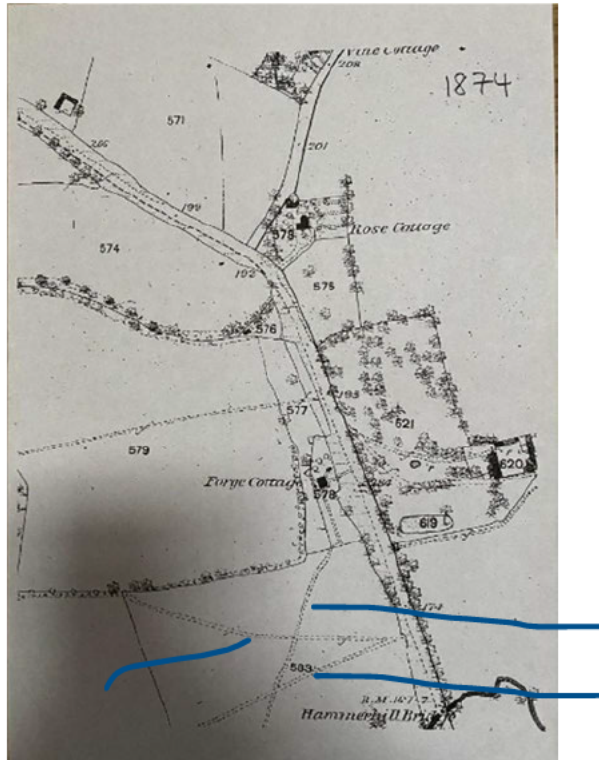


not mentioned. Why is that? How can it have been missed out? This needs to be addressed.

The map from 1894 and the older Tithe map below show both the building & well circled in blue:



- The application field in question appears to have three ancient footpaths shown on the 1874 map below, which cross the field (pinpointed in blue). This needs to be addressed e.g. permission sought from Natural England. Also, The below map is older than the earliest one listed in the *Historic Environment Desk Based Assessment RevE Part 1.pdf*, which is 1879. Why is this?

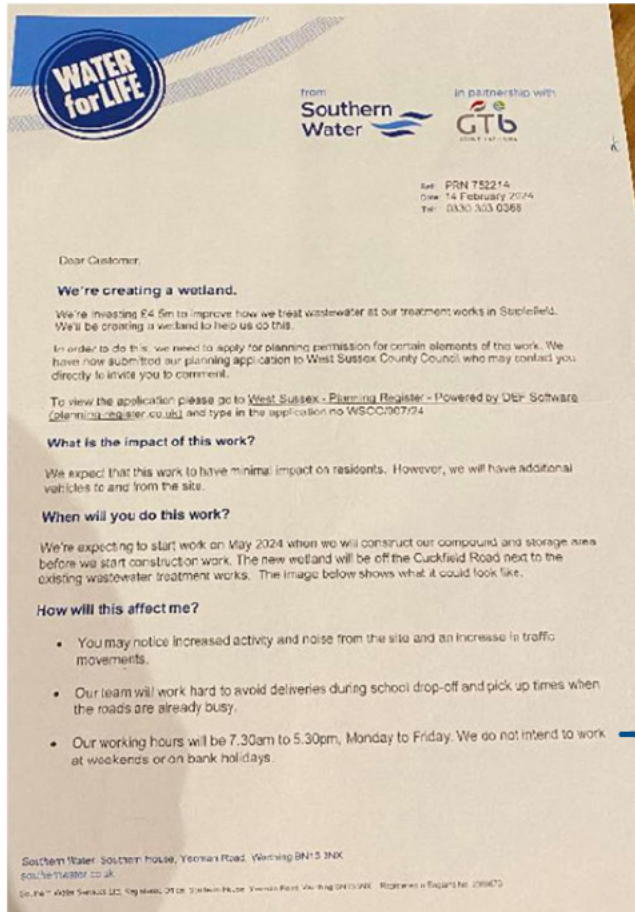


- There is another brick-built World War II Pillbox that is missing off the *Historic Environment Desk Based Assessment RevE Part 1.pdf*. It is circled below in blue and is in the north hedge row, likely to jut into the field of the application – see the blue circle in the photo below for its position. This needs to be addressed.  
Note: It is not the pill box in Photo B.8



#### 4. Dust/odour/fumes:

- This new industrial site is proposed for a 5 and half day week construction operation but the Southern Water letter to Staplefield residents date 14<sup>th</sup> February, says working hours of Monday to Friday 7:30am to 5:30pm. This is unacceptable for residents, with construction at 50 hours a week. There should be no work on a Saturday as the letter (pinpointed in blue) mentions below. There is a statutory right to enjoyment of one's own homes and gardens.



- There will a huge amount of dust and dirt, which the prevailing southwest winds will take the noise and polluted air over Staplefield village.
- There should no nighttime construction activity with vehicles lights or beeping of machines/vehicles etc.
- In America, one of the key ICW issues they suffer from is stinking stagnant water. The village of Staplefield is due north of the site so the prevailing wind from the south southwest will take the smell of potentially stagnant water over the village. This needs to be addressed.
- In the times of drought, consideration needs to be taken that the odour that will be produced will impact the village. This needs to be addressed.

**5. Impact on trees/hedgerows:**

- There is no suggested new trees or hedgerow covering the field, like the trees surrounding the current Staplefield WTW. New hedgerow should be planted in the gaps that are visible on Cuckfield Road.
- The ICW cells and drainage pond should be out of sight and not noticeable from the road or to the naked eye. The site should not be visible from Cuckfield Road
- There should be no visible change in height to the current field levels.

**6. Layout/appearance/design of buildings:**

- It is not okay to concrete over a green belt field with paths and a car park.
- There should be no additional carpark.
- A visitor centre should not be an option. This is not a tourist destination.



- There should be no lights / fog lights / flood lights on the site either during any construction or post that. This is a rural area with little light pollution.
- A car park will attract antisocial behaviour being so rural and is a prime site for fly tipping because it's so remote. This happens around this site with mattresses & fridges being dumped.
- More parking is not necessary for maintenance, as it would be done annually.

**7. Traffic generation/access/highway safety.**

- Cuckfield Road is busy. There is already a sufficient access road to Staplefield WTW with car parking, so no further access is needed and completely unnecessary.
- Any increase in public visitors will mean that the current road infrastructure will be impacted. The small roads of the village will be battered by the heavy lorries.
- Whilst the highways agency seems comfortable with the speed issues that may manifest, it is almost guaranteed that it will increase potential accidents if a new access route is approved. This stretch of road is a known accident black spot.
- Where is the study on the small bridge over the River Ouse by the WTC to ensure that it can cope with these continuous heavy lorries? This needs to be addressed.

**8. Impact on natural environment including animals and their habitat:**

- It is incumbent on us all to protect natural green belt & wildlife for the future generations. Allowing them to be turned into industrial sites in a Southern Water 'first of its kind' experiment goes against all of that.
- In this area, from recent Staplefield resident sightings, the following protected species have been seen. This proposal is a genuine threat to their natural habitat. The *Ecological Impact Assessment RevB.pdf* report is not satisfactory. A proper field study is needed, rather than a desk study. This needs to be addressed.
  - three types of bats
  - crested newt
  - barn owls – in the lighter evening the barn owl can be seen circling the proposed development field looking for food.
  - badgers
  - door mice

**9. Noise/disturbance:**

- There will be a huge amount of construction noise for 6 months, which the prevailing southwest winds will take over Staplefield village.
- The planning application mentions working on Saturday. This is not acceptable.
- It is mentioned that it may be a visiting attraction to school children so where are the facilities to provide for this? Does that mean school coach trips? If this site is open to the public the verges on Cuckfield Road and Rose Cottage Lane are likely to be blocked.

**10. Effect on the landscape or character of the area:**

- It's a historic ancient green belt field site opposite a historic mill complex and sitting below Forge Cottage, which was a building standing certainly from early/mid 1800s.
- To approve this now will irrevocably change the landscape forever.

- Proper architectural drawings of the side profile are needed in various scales, similar to those found for a new house build, including how the landscape might look. This needs addressing because the *Site Cross Section.pdf* does not clearly show how the ground levels will look versus the current landscape.

We would be grateful if these matters could be taken into consideration in the determination of the application.

Lastly, we respectfully request that the Chiffley Grange house photo is redacted from the planning documentation, *Historic Environment Desk Based Assessment RevE Part 1.pdf* page 38 (MM10) and anywhere else. No permission was sought to include it.

Yours sincerely,

Mr & Mrs N. Oakden,

