

Since the first application was filed we have been in touch with the Leadership Team at Southern Water, who have taken the time to meet with us and discuss our concerns. We appreciate this is a complex situation and we are grateful for the opportunity for our concerns to be heard.

However, there are still some serious gaps in the latest submission, which if not addressed, make your recommendation to the Planning Committee one of pure guesswork.

1. Failure to adequately address Policy W6.

The application suggests that alternative options have been considered but provides no justification or reasoning. In a telephone call with the SW Leadership Team they were unable to provide any compelling economic or environmental justification for the ICW option and in a subsequent email summary of the meeting they confirmed the economics of an ICW are marginal, at best. There is no evidence of any rigour in their appraisal of the options. My understanding is that a Freedom of Information request has also revealed that the most viable alternative (Soneco P&W) had not actually been considered, in spite of the LT claiming they had met with Soneco. We approached Soneco and they claim no specific contact was made to evaluate their solution for phosphate removal at Staplefield. The Soneco solution is publicly endorsed by SW as a reliable and cost effective solution. So why is it not a cost effective solution for Staplefield? Where is the truth in all this and on what basis are you satisfied that all alternative options have been considered? Are you simply going to take their word for it?

Policy W6 of the West Sussex Waste Local Plan states that "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."

Nowhere in the submissions is there any explanation as to what the alternative traditional hard infrastructure solution to reduce total phosphorous (TP) might be; why this cannot be accommodated within the existing site, and if this might be a less visually intrusive solution to meet the new permit requirements. The applicants have therefore failed to explain how the proposal complies with Policy W6.

2. Hardscaping & Over-engineered Design

The latest submission still includes driveways for vehicles. Southern Water have confirmed in writing the principal reason is the conditional agreement with the land owner, who wants a new driveway to give him access to adjoining land. The application does not consider an existing right of way the land owner has via a private driveway 100m north of the proposed site. What is the justification to construct a second vehicular access for the land owner? Removal of this unnecessary addition to the application would be a significant mitigation.

Southern Water claim they require limited access for their own vehicles. If this is the case, can they further reduce the scale and network of the tracks and use grass grids (much more in keeping with a rural environment), instead of stone driveways?

In summary, I think more can be done to reduce the visual impact of the scheme and, until the alternative options have been properly justified to you, I fail to see how you can make an informed recommendation to the Planning Committee.

Yours,

Martin Ireland