PLAISTOW AND IFOLD PARISH COUNCIL

5th October 2022

Jo Bell
Development Manager
Majors and Business Team
Chichester District Council

Sent via email: jbell@chichester.gov.uk

Dear Ms Bell,

Re: 22/01735/FULEIA | Regeneration of Crouchlands Farm, Rickmans Lane Plaistow Billingshurst West Sussex RH14 0LE

Plaistow and Ifold Parish Council considered Planning Application 22/01735/FULEIA at a public meeting on 27th September 2022.

The Parish Council **STRONGLY OBJECTS** to this application for a range of reasons; however, in this letter, the Parish Council sets out its objections based on the issues of Water Neutrality and Drainage only.

The Parish Council will further respond to this application no later than 11th October, as agreed with Ms. Martin.

We note CDC's letter to the applicant dated 30th September 2022 setting out further information required by CDC in order to fully understand and assess the impacts and effect of the proposed development and that additional requests for information may follow. There is a section on Water Neutrality where CDC sets out the serious deficiencies and omissions of the planning documentation submitted by the Applicant. The Parish Council submits these representations without sight of the further information required by CDC and reserves the ability, as a statutory consultee, to prepare further representations on additional evidence and documentation submitted by the Applicant.

WATER NEUTRALITY & DRAINAGE

Summary
○ The water neutrality assessment was conducted by WA Consulting Engineers who produced a report, 'Water Neutrality Assessment for Proposed Development at Crouchlands Farm'

dated March 2022. The points picked up below refer to this Report which will be subsequently referred to as the 'WA Report'.

- The WA Report questionably shows a reduction in water demand at the Site (compared with the existing farm operation) of approximately 460m3/yr (10% reduction on the Site's existing water demand). This consists of the increased capacity for the Whole Farm Plan, minus the credits for rainwater harvesting and BREEAM credits.

- However, the Planning proposal outlines the following additional water consuming facilities:
  - 107 Toilets,
  - 5 Urinals,
  - 141 Wash Hand Basins,
  - 43 Showers,
  - 6 Baths,
  - 4 Washing Machines,
  - 1 Hydrotherapy Pool,
  - 1 Cold Spa,
  - 1 Water Treadmill,
  - 4 Washdown Areas

- The WA Report claims credits for rainwater harvesting in the form of attenuation ponds and the application of BREEAM standards, which, for the reasons outlined below, cannot be applied in the form of credits.

- Additionally, no allowance has been made in the numbers for the resident staff, showering for the 105 cycle users and horses.

- No allowance has been made in the numbers for the water requirements of the various proposed end users of the light industrial units such as food producers, bakers, ironworkers, woodworkers, chefs, microbrewers, jewelers, or "craftsmen". Many of these activities are 'water heavy'. Similarly, no allowance has been made in the numbers for the water consumption of the end users of the office units, education accommodation, laboratories, or conference facilities.

- The scale of the proposed facility is substantial and will see an estimated increase in water demand, according to the WA Report, of *7350.84 m3/yr (see Figure 5, page 16 of the WA Report). This does not account for rainwater harvesting, BREEAM credits or any other water mitigation proposals outlined by the Applicant. The Applicant recognises that their proposals amount to a huge increase in water demand for the Site. Once the Applicant's water mitigation proposals have been discredited/discounted (as highlighted in this letter), all the Applicant has illustrated is how water heavy their proposals are, notwithstanding all the other omitted water uses throughout the Site. *The figure stated will need to be

increased significantly in-line with the Parish Council's recommendations outlined below.

- According to the calculations shown below, the Parish Council estimates that despite the WA Report claiming that there will be a reduction of 460m3/yr there will actually be an estimated increase in water consumption of 63,215m3/yr, which amounts to a 1200% increase in water demand on the Site compared to its current 5197m3/yr. This would place a harmful and irreversible impact on the Arun Valley, SPA, SAC and Ramsar site. The water consumption figure in the WA Report does not account for 2022 projected livestock numbers. This, along with the substantial increase in water demand due to the new development, will significantly impair the farm's ability to function as a viable farm. For the farm to remain water neutral - if the demand increases due to the new development - the existing demand (which is predominantly down to the existing livestock) would need to decrease by the same amount, therefore reducing the viability of the farm. In simple terms, even if there was no livestock on Site, the proposed development would still see a net increase in water usage.

- The WA Report claims the use of rainwater harvesting (ecological ponds) as a means of providing for the farm livestock. However:
  a. These ponds have not been shown on the farm plan
  b. The ponds take no account of evaporation or seepage
  c. No mitigation has been considered against any future overspill from Lagoon 3
  d. No mitigation has been considered against any pollution in the form of slurry infiltration

- The WA Report claims the use of BREEAM standards as a method of reducing water consumption. However, these methods are not relevant to many of the new users/uses. Any further planning resubmission should be clear on which users these standards can be applied and show the individual build-up of these water savings along with the total saving. Some examples of where BREEAM credits cannot be applied are the hydrotherapy, cold spa, water treadmill and drinking water for horses, which will be significant users.

- The Parish Council believes consumption for the glamping facility has been severely underestimated at 100L/person/day as this seems to equate to a caravan (see Fig 3 on pg.12 of the WA Report) which would utilise a chemical toilet and rudimentary shower. More realistically these glamping facilities would be better compared to a holiday camp chalet which has a recommended usage of 227L/person/day (See also Fig 3).

- No provision has been made for foul drainage in the form of connection to the mains sewer or alternatively a dedicated sewage treatment facility, which would require an Odor Assessment and Permit to discharge to a suitable water course.

- Southern Water Planning have written to the Parish Council regarding the available capacity of Loxwood Water Treatment Works (L.WTW). Southern Water's 'Future Growth Planner' stated that the L.WTW *"is included in PR24 for a growth scheme for AMP8 (2025-2030),*

including application for a new DWF permit". However, the Applicant has thus far failed to liaise with Southern Water to submit the foul drainage flows and verify with Southern Water that, along with any other developments planned in the area for this period (considering the ongoing development plans in Loxwood village and the Applicant's own aspirations for a 'Rickman's Green Village' of some 600 houses), that the increased capacity can be accommodated in the application for this new permit.

- No allowance has been made, whatsoever, for water irrigation due to the planting of 320 trees, 25,000m of hedging (refer to P.8/15 of the Planning Statement) and other wilding areas, which would consume a colossal amount of water outlined in the findings of this letter.

- According to the tree planting specialists Barchams, during the height of summer, newly planted trees require 20 litres of water every other day, for two years. For 320 trees this equates to 294m3 of water per year (June through to August). In other words, one tree during the height of summer, will require approximately 1 ton of water.

- For new hedges, according to Hopes Grove Nurseries, root ball hedging plants over 120/150cm would require 20 litres per plant once a week, or twice weekly during very hot weather. For 25,000m of hedging - at a plant spacing of 4 plants per metre - and a yearly average watering frequency of 26 weeks, this equates to a massive 52,000m3 (52 tonnes) which dwarfs the balance of consumption from the Whole Farm Plan. It is of great surprise to the Parish Council that this is not referred to, in any way whatsoever, within the WA Report.

- Keeping 320 trees, 25,000m of hedging and wilding areas sufficiently irrigated would require a substantial irrigation system, most likely underground, which is not incorporated in any of the application documents for consideration.

1. **Water Neutrality:** The Parish Council has considered the 'WA Report' on Water Neutrality in detail.

2. Considering the consequences highlighted in Natural England's Position statement (Appendix D of the WA Report), namely, increasing water demand thought to be harming internationally protected species with a potential threat of extinction, the Parish Council finds the WA Report to be woefully inadequate, lacking in detail, inaccurate and misleading to the point of being irresponsible.

3. Despite the WA Report claiming that the new development would bring about a reduction in water demand, it would in fact greatly increase water demand and therefore place an unacceptable and harmful impact on Arun Valley, SPA, SAC, and Ramsar Site.

4. **Foul Drainage:** Foul drainage should be one of the prime considerations for such a large-scale development. Therefore, the Parish Council is surprised that there is no mention of any provision for foul drainage in the planning documents for the farm regeneration.

5. The Parish Council is also surprised that the application documents make no reference to any communications with Southern Water detailing plans of either connection to the mains sewer or stand-alone sewage treatment plant with discharge to an accepted water course, along with permit to discharge from the Environment Agency.

6. A material consideration must be the farm's increased water demand brought about by the planned proposals. Not only will this severely breach the Water Neutrality requirements, but it will also compromise the farm's ability to operate as a functioning farm since there would need to be a corresponding step down in the existing water demand to cater for the increased capacity brought about by the new development to give a net zero increase or better.

7. The Parish Council strongly recommends that an independent water report, covering both sewage and water, is undertaken on an urgent basis as the WA Report is extremely poor. If taken at face value, and if the farm development were to go ahead, the WA Report could assist in leading to a result that would cause irreversible consequences as highlighted by Natural England.

8. It is extremely difficult to believe that a development of this scale, which includes an indoor arena with 320 capacity, hydrotherapy pool, water treadmill, cold spa, cookery school, rural enterprise centre, luxury glamping facility, 4 stables, restaurant, wedding venue, 320 trees and 25,000m of new hedging amongst other users/uses will somehow bring about a water reduction.

Water Neutrality

Issue 1 – Water consumption does not account for projected 2022 livestock numbers

9. The WA Report says that since the number of livestock at Crouchlands Farm is ever changing for each livestock category the maximum value for each category should be accounted for in determining required demand. On P14, 6.3 it says that the existing demand is based on the projected figures for 2022. It further states (pg.14, 6.7) that it has been advised that the farm could accommodate:

   - 180 Cattle
   - 112 Pigs
   - 1482 Sheep

   On pg.14, 6.8 it states that if the above livestock figures are used the existing water usage would be 8219m3/annum, vs a current demand of 5196.9m3/annum (4649.4m3 for livestock and 547.5m3 for the existing farm).

However, this higher figure has not been used for the Proposed demand, so this in itself accounts for a shortfall in water demand of more than 3,570m3/annum. This should be corrected in the WA Report.

Issue 2 – Utilisation of rainwater harvesting to offset livestock demand

10. The WA Report incorrectly uses the previous livestock numbers for determining the area required for rainwater harvesting, instead of the projected livestock numbers for 2022.

11. The WA Report claims that to offset the livestock demand based on an annual rainfall figure of 808mm that a total surface area of 5,754m2 would be required. This is claimed by the use of attenuation ponds, which would also bring ecological benefits.

12. Whilst the Parish Council has verified that the claimed rainfall figure of 808mm is correct, there is a grave omission within the WA Report; in that there is no allowance for losses due to evaporation or seepage.

13. The Parish Council has verified that the evapotranspiration rates are available from the Met Office and can be acquired easily by the Applicant and therefore recommends that these are acquired by the Applicant, as a matter of urgency, for a small fee.

14. In the meantime, the Parish Council has obtained evapotranspiration rates from Crondall Weather data online. Due to its relative proximity to Plaistow, the rates can be used as an illustrative guide pending the Applicant obtaining the information from the Met Office.

    The evapotranspiration rates are shown as an extract in **Table 1.**

    The evapotranspiration rates for the last 2 calendar years vary between 744mm in 2020 and 660mm in 2021.

Table 1 – Evapotranspiration figures, Crondall, Hamshire

Evapotranspiration													
Date	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
2022	11.3 ↑	27.5 ↑	44.3 ↑	77.8 ↑	99.2 ↑	124.7 ↑	142.0 ↑	110.4 ↑	56.5 ↑	7.5* ↓	---	---	701.2* ↑
2021	11.0 ↑	23.7 ↑	40.9 ↑	77.0 ↑	88.6 ↑	105.9 ↑	112.1 ↑	78.0 ↑	58.5 ↑	34.8 ↑	17.6 ↑	12.3 ↑	660.4 ↑
2020	1.1 ↓	28.6 ↑	49.2 ↑	80.2 ↑	126.9 ↑	115.1 ↑	118.9 ↑	101.9 ↑	66.8 ↑	29.3 ↑	16.0 ↑	10.4 ↑	744.4 ↑

Additionally, the Parish Council has obtained average monthly rainfall data for Plaistow, West Sussex via the following website https://www.worldweatheronline.com/plaistow-weather-averages/west-sussex/gb.aspx. This rainfall data is shown in **Table 2** on the following page.

Table 2 – Average annual rainfall, Plaistow, West Sussex

Month	Average Rainfall (mm)	Average Rainfall to date (mm)
January	78.2	78.2
February	68.3	146.5
March	52.9	199.4
April	41.3	240.7
May	59.3	300
June	67.3	367.3
July	61.1	428.4
August	65.4	493.8
September	47.8	**541.6**
October	81.7	623.3
November	81.2	704.5
December	87.6	792.1

As an illustration, the average annual rainfall to 30th September 2022 according to **Table 2** is **541.6mm**. This is versus an evapotranspiration figure as of 4th October 2022 according to **Table 1** of **701.2**mm.

What this illustrates, is that discounting any consumption by livestock, the losses of water from any attenuation ponds due to evapotranspiration will negate any accumulation of rainwater. Therefore, attenuation ponds cannot be used for offsetting the farms livestock water consumption and therefore should be discounted as a credit towards water neutrality.

15. In addition to evapotranspiration, the Applicant also needs to account for seepage, unless they can demonstrate any mitigation through the use of a waterproof liner on any of these ponds.

16. It should be noted that the WA Report mildly says that this rainwater harvesting is straightforward, but there are no details of any such ponds on the plan.

17. Any such plan needs to plot the expected level in these ponds against the expected rainfall, evaporation, seepage, and livestock consumption month by month to ensure that water levels can be maintained throughout the entire year.

18. However, the Parish Council contends that without topping up with mains water these ponds will run dry in the summer months when the water demand from livestock is at its highest. Therefore, the Parish Council asserts that attenuation ponds cannot be used as a reliable source of livestock drinking water.

19. If these ponds (livestock watering holes) are to be used for livestock drinking water these ponds will quickly become contaminated with slurry. In other words, it will surely be impossible to provide access to livestock for drinking water whilst avoiding the infiltration of slurry.

20. In addition to the above, the Parish Council notes the Joint Incident Response Plan for Crouchlands Lagoon 3, dated October 2019 ('The Plan') produced in association with the Environment Agency, Chichester District Council, West Sussex Country Council, West Sussex Fire & Rescue Service and Public Health England. This Report is available online here.

21. The purpose of the Plan is to ensure that local responders have a baseline framework and background information to make a swift and effective response to a potential or actual release from Lagoon 3 at Crouchlands Farm.

22. The Plan would need to be updated if any development of Crouchlands Farm is to be undertaken.

23. The Parish Council has some concerns which relate to the Plan and the impact this could have on any open ponds. According to the Plan, Lagoon 3 contains approximately 53,000m3 of unknown digestate. Also, that the lagoon is covered by a triple plastic liner, which could have a lifespan of ten years (installed 2013/2014).

24. The Plan goes on to say that there have been 3 significant incidents that the Environment Agency responded to since 2013.

    - 2013 – A discharge from a winter slurry deployment which polluted the River Kird
    - 2015 – Discharge of Lagoon Effluent entering surface drainage on Site and into a nearby water course associated with a mechanical failure of equipment
    - 2016 – Digestate Spill into a watercourse

25. Even if these ponds *could* provide a source of drinking water for the farm livestock there is a serious concern that any future releases from Lagoon 3 could end up polluting any drinking ponds with unknown digestate which could enter the food chain.

Issue 3 – Vast underestimation of the Farm development demand

26. Exhibit C of the WA Report gives the proposed demand of the equestrian centre. This based on an average number of visitors /occupants of 10 per day and 20 occupants (Total = 30) and 40 Litres/person/day = 438m3/annum.

27. The Parish Council asserts that the above figure is a gross underestimation, since it fails to account for the following details: -

    - The indoor arena has a capacity of 320. For the equestrian centre to have a successful business case the indoor arena would need to hold regular events. Therefore, in this regard alone the water consumption would be far higher. The water consumption should be recalculated to include the number of events that would yield a successful business case.

- In the Applicant's Transport Assessment, item 6.42 advises a total of 105 secure cycle shelters. In section 3.1 of the WA Report there is reference to accommodation for the rural enterprise centre (230m2 for students or staff) and equestrian centre (live-work accommodation). This would be consistent with the documented opening hours that the equestrian centre is open 24/7. However, there is no related water consumption for these cyclists, or people staying at the mentioned buildings. The WA Report needs to be updated to show revised numbers.

- The proposed end users of the light industrial units include food producers, bakers, ironworkers, woodworkers, chefs, microbrewers, jewelers, or "craftsmen". No account has been taken of the water usage of these activities, or the water demands of the unknown number of staff each third-party end user may have who rents the light industrial units. Similarly, no account has been taken of the personnel using the office units, education accommodation, laboratories, or conference facilities. Ultimately, the Applicant is unable to calculate how much water any of these hypothetical end users may require, which means that it can never provide an accurate account of the Site's water demand.

- The equestrian centre seems to discount entirely any provision for horses. The equestrian centre is equipped with a cold spa, water treadmill and hydrotherapy pool. These facilities would consume a huge amount of water. Therefore, the Parish Council is surprised that these users/uses have been excluded from the WA Report along with wash down water for mucking out horses. Any water neutrality Report needs to work in these numbers. The equestrian centre seeks to provide 40 livery boxes. However, it is surprising to see that no consumption has been considered for horses. A simple internet search will advise that the average horse will drink between 5 to 10 gallons of fresh water per day (here). This needs to be factored into any water neutrality calculation.

- The breakdown for water consumption for Glamping/Hardnips Barn is unclear and more detail needs to be provided. According to Table 8-8 of the Transport Assessment, Hardnips Barn will be capable of hosting weddings. In 8.5.7 it says that Hardnips Barn and the glamping site would be hired out so that guests can stay overnight to reduce transport visits. However, their water consumption has not been considered and needs to be accounted for.

- The farm plans include an addition 320 trees, 25,000m of hedging and wilding areas. This will require a significant water demand, which has not been accounted for in the WA Report. Watering is one of the prime keys to successful establishment after planting a tree or hedge and the amount of water required will depend on the weather and time of year; both of which are outside of the Applicant's control, but nevertheless will have a significant impact on the water usage of the Site. According to Barcham, the Tree Specialist

* A newly planted tree should be watered in when planted, and at the point of bud burst in the spring and should be continued throughout the spring and summer until the leaves have fallen in autumn (for deciduous trees).

* Watering is advised for the first 2 summers after planting, further to this the tree should be able to access water from the surrounding soil.

* During the height of summer, water should be applied at a rate of 2 domestic bucket fulls (or 20 litres of water) every other day.

According to Hopes Groves Nurseries

*Hedge plants over 120/150cm would require 20L per plant once a week

Water consumption (trees)

Considering June through August (as the height of summer) the watering regime for 320 trees would be 320 (trees) x (20/1000)m3 x (92days/2) = 294m3. In other words, one tree, during the height of summer, will require approximately 1 tonne of water. The Parish Council notes Barcham's recommendation that watering is advised for the first two summers after planting. This consumption is not referred to, in any way whatsoever, within the WA Report.

Water Consumption (Hedging)

Based on Hopes Grove Nurseries recommendations for establishing a hedge, and taking a hedge spacing of 4 plants per meter, the estimated consumption will need to be: -

25,000m of hedge x 4 plants/meter = 100,000 plants
Estimated number of water weeks/year = 26
Average watering regime = Once per week
Recommended consumption = 20L per plant per week

Total Consumption = 100,000 x (20/1000) x 26 = 52,000m3 (52 tonnes/year)

Keeping 320 trees, 25,000m of hedging and wilding areas sufficiently irrigated would require a substantial irrigation system, most likely underground, which is not incorporated in any of the application documents for consideration.

28. It is difficult to understand how the WA Report claims an overall reduction in water demand for the new facility when the following water consuming facilities will be added, which goes some way to showing the vast scale of the new development: -

- Indoor arena (Ground Floor): 12 toilets, 12 wash hand basins, 9 showers
- Indoor arena (1st Floor): 7 toilets, 9 wash hand basins, 3 Urinals
- Stables (x4) (Ground Floor): 4 Washing machines, 4 kitchen sinks, 4 wash hand basins, 4 Toilets
- Stables (x4) (First Floor): 4 baths, 4 showers, 4 toilets, 4 wash hand basins
- Food & Retail: 13 Toilets, 14 sinks, 2 Urinals
- Building B: 9 Toilets, 11 sinks, 2 showers
- Building D: 8 Toilets, 13 sinks, 2 showers
- Building E: 4 Toilets, 8 sinks, 2 showers
- Building F: 5 Toilets, 10 sinks, 2 showers
- C Live Work Units: 4 Toilets, 8 sinks, 4 showers
- Cookery School: 3 Toilets, 12 sinks
- Lodges (x4): 4 Toilets, 4 basins, 4 showers
- Underground Pods (x3): 5 Toilets, 3 showers, 2 baths
- Wigwam (x2): 2 Toilets, 2 wash hand basins, 2 showers
- Treehouses (x5): 9 Toilets, 9 wash hand basins, 9 showers

29. The water consumption for the glamping facility has been estimated at 100Litres/p/d which seems to have been taken from P12 of the WA Report for a caravan. However, caravans use chemical toilets and rudimentary showers. However, the Parish Council believes this is an underestimation and the figure should be more in line with a holiday camp chalet, which is 227 Litres/p/d according to the British Water table on page 12 of the WA Report.

Issue 4 – Incorrect credit for BREEAM standards

30. The proposed water consumption figures make mention of BREEAM and give a credit of 3, which equates to an estimated water saving of 40%. The document states that this should be relatively easy to achieve in section 7.15 of the WA Report.

31. However, the Parish Council has considered the BREEAM recommendations, and they refer to toilets, wash basins, showers, baths, the use of water butts, smart meters, education on water usage and water saving appliances. The BREEAM recommendations are considered relevant to domestic users and are not relevant to an equestrian centre including equine rehabilitation pools. Therefore, the Report should either omit BREEAM as a credit, or validate this against each consumer in the equestrian centre.

Issue 5 – Estimated increase in water demand due to farm regeneration

32. Based on the above, namely: -

- No credit for BREEAM standards as these applies to domestic users and not to the usage given in the WA Report.

- No allowance for rainwater harvesting, since the ponds are not shown on the plan; the recorded evapotranspiration figures for 2020 (in the link provided above) negate the rainfall figures given; no evidence provided showing that the ponds will provide year-round water availability for livestock.

The Applicant provides no credible evidence for its existing demand calculations. As CDC sets out in its 30th September letter to the Applicant there are a number of inaccuracies and evidence lacking in respect of 'existing consumption' to confirm the baseline position. We do not set these out in full here but we note that CDC has stated that:

> *"Baseline consumption needs to be fully evidenced to give certainty of the actual mains water being used at a site. Metered water bills are the best way to achieve this certainty, and the Council, as competent authority, as will Natural England, will require this information to verify details of historic water usage. The method of identifying existing water usage by counting the head of stock present at any one time is not an acceptable way of assessing historic water usage as it does not represent 'complete, precise and definitive findings'".*

We note that Horsham District Council has set out its method regarding water neutrality and planning applications (see webpage: https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/water-neutrality-and-planning-applications#offset). Like CDC, it also requires copies of metered water bills and that for agricultural buildings if the buildings are not individually metered then the they will likely only be able to consider existing water consumption as nil and that for agricultural uses it will need to be clear that the water is from the mains supply, and not watercourses or other rain collecting means:

> *"The best way to evidence existing mains water consumption is via copies of metered water bills from within the last three years. The bills should cover the period before Covid as well as after as the lockdowns will have affected consumption at many sites. Unmetered water bills will not be accepted. Where there are other uses on a site, or the use is shared across multiple other buildings and land, it will be difficult to evidence with certainty the actual water use from a building unless separately metered. This is particularly the case for agricultural buildings. In such scenarios we will likely only be able to consider existing water consumption as nil. In cases where you are evidencing water consumption from agricultural uses, it will need to be clear that the water consumed is coming from the mains supply, and not watercourses or other rain collecting means."*

Therefore, there can be no reliance placed on the Applicant's calculations for existing demand which are set out below:

Existing Livestock – 4,649.4m3/yr (Water Neutrality Assessment Appendix B)
Existing Farm – 547.5m3/yr (Water Neutrality Assessment Appendix B)
Total Existing demand – 5,196.9m3/yr

Based on the Applicant's calculations these are the resulting demands if the scheme were to go ahead:
Maximum Livestock – 7,671.8m3/yr (Water Neutrality Assessment Appendix A)
Existing Farm – 547.5m3/yr (Water Neutrality Assessment Appendix B)
Whole Farm Plan (without credits) – 7,898.3m3/yr (Water Neutrality Assessment Appendix A)
Sub-Total without correction = 16,117.6m3/yr

Plus the following omissions/corrections outlined above which are summarised as follows:

- Increase in indoor arena consumption based on events
- Showering for cyclists
- Water consumption for permanent residents
- Water consumption for horse drinking water and mucking out
- Water consumption for wedding guests at Hardnips Barn
- Irrigation for trees and hedging, in excess of 52,294m3/yr
- Increased water consumption for glamping facility

It can be seen from the above breakdown that even the Applicant's estimated increase in water consumption is in considerable excess of:

16,117.6m3/yr + 52,294m3/yr – 5196.9m3/yr = **63,215m3/yr**

This figure does not account for any of the other errors in existing and future water consumption that the Parish Council has highlighted above and as set out in CDC's 30th September letter to the Applicant.

Foul Discharge

Issue 6 – Lack of provision for foul drainage

33. In the planning documents submitted on behalf of the Applicant to date, there is no undertaking on behalf of the Applicant to approach Southern Water regarding connection to the existing sewage main, or to engage with the Environment Agency if they propose to install their own sewage treatment plant.

34. The latter would require an Odour Assessment as picked up by the Environment Agency on the EIA scoping application and also a permit to discharge any treated water to an identified water course. Any such sewage treatment plant would need to provide provision for the maximum foul drainage based on all facilities.

35. The Parish Council is surprised that for a development of this size that these major details are missing from the submitted application and that it has taken the Environment Agency and Southern Water to come forward with these comments.

36. The Parish Council has received correspondence from Rachel Powys-Keck, Future Growth Planner at Southern Water on 13th September 2022, which states the following:

"Following on from the email I sent out to you […] I have further information I can provide you with.

The assessment of this Site in relation to available capacity at Loxwood WTW flagged that although DWF capacity was exceeded in 2021, this Site could connect, if it is ready to, during AMP7 (2020-2025). I've been informed that Loxwood WTW is not expected to exceed its DWF permit in 2022 based on flow measured so far, but obviously this is not 100% certain until the year end. In addition, Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025-2030), including application for a new DWF permit.

In AMP7 (the current investment period 2020-2025), there is a capital scheme Loxwood WTW that will increase the FFT (Full Flow to Treatment). This will significantly reduce storm overflows.

In summary, we are able to accept the connection of foul flows from this development at Loxwood WTW.

The remaining issue relates to network (pipes) rather than treatment and for the developer/a NAV or other appointee to construct a satisfactory sewer to join new development to the Loxwood network which is located some distance away.

You're aware from our response to the planning application consultation that network reinforcements are needed to accommodate flows from this Site at the nearest manhole in the Loxwood catchment, and we have requested conditions that will allow the necessary time for us to deliver the reinforcements. We will commence work on this once planning consent has been granted.

I hope that helps.

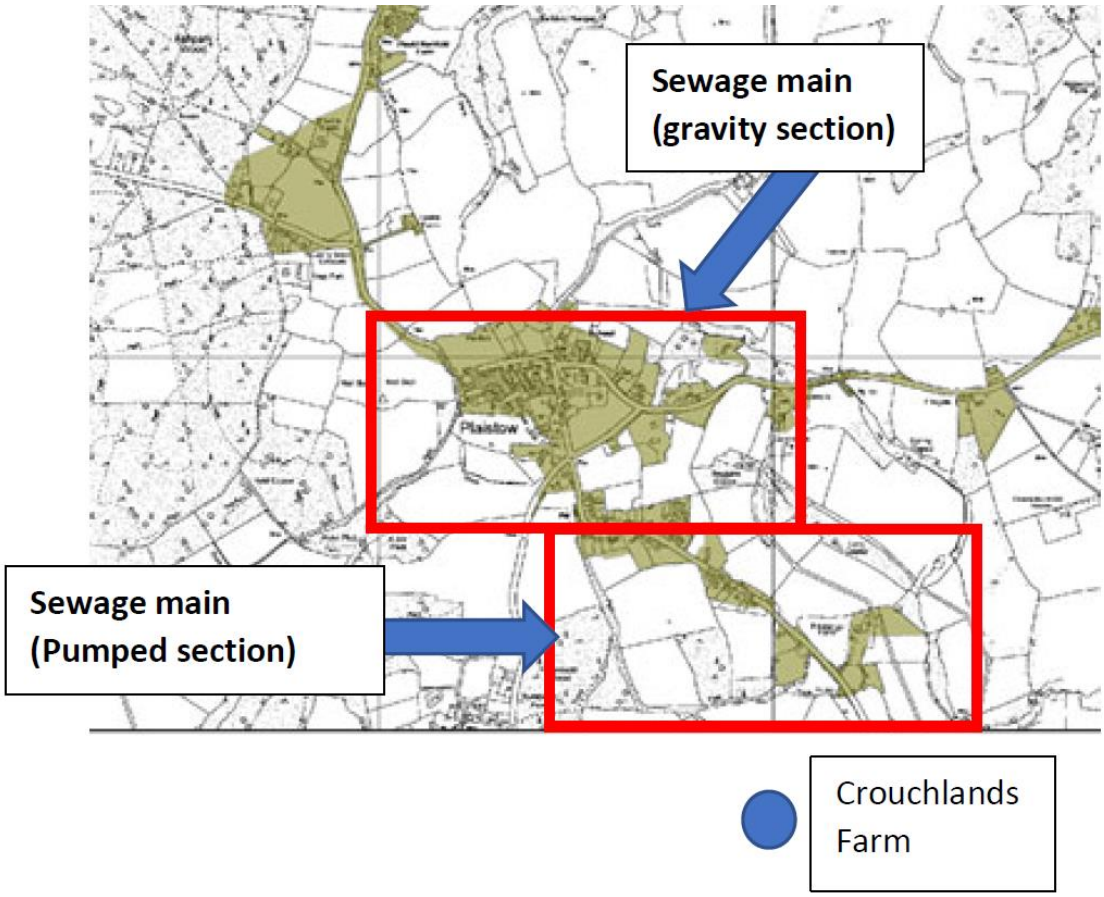
Kind Regards
Rachael Powys-Keck Future Growth Planner, Sussex

37. The above correspondence states, *"In addition, Loxwood WTW is included in PR24 for a growth scheme for AMP8 (2025-2030), including application for a new DWF permit".*

The Applicant would need to submit the foul drainage flows and verify with Southern Water that, along with any other developments planned in the area for this period (considering the ongoing development plans in Loxwood village and the Applicant's own aspirations for a 'Rickman's Green Village' of some 600 houses), the increased capacity can be accommodated in the application for this new permit. To date, as far as the Parish Council is aware, no capacities have been submitted to Southern Water.

The shaded green areas in **Figure 1** below show the properties which are served by mains sewage/Loxwood WWTP. The annotations show that Plaistow village has two mains sewage sections; i) Gravity section, ii) Pumped section.

Figure 1 – Plaistow catchment area for mains sewage



Crouchlands Farm is not currently located on the Loxwood WWTP main and is located at a much lower elevation than the gravity section of the Plaistow main sewer. It is also located further south than the pumped section. The properties located below the pumped section, including Crouchlands farm are not on mains sewage and have their own sewage treatment plants.

Therefore, if Crouchlands Farm does intend connecting to the existing main for the farm development any required infrastructure would need to include for a new pumping station and main to tie into a suitable location to allow drainage to the Loxwood WWTP which would require substantial investment.

Yours sincerely

Catherine Nutting
Clerk & RFO of Plaistow and Ifold Parish Council