

Upper Burrells,
Chiltington Lane,
East Chiltington.
East Sussex
BN7 3QT
15/09/16

Andrew Hill,
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Response to Planning Application LW/16/0695 in East Chiltington for a

Fish Farm with Office, Equipment and Feed Store, Open-Fronted Vehicle Store, Control Room, Generator, Staff Changing room, purging tanks and Caviar Processing Areas plus a 3 bed-roomed 'Temporary' House.

Dear Mr Hill,

I would like to outline my very strong objections to the proposed new development as described above which is on two fields adjacent to our house and garden at Upper Burrells, East Chiltington. This site is within less than 100 meters of the South Downs National Park (SDNP), and is along a very quiet and narrow country lane which is much frequented by walkers, runners, cyclists and horse-riders, all of whom are likely to be significantly and detrimentally impacted if the development is allowed to proceed. For many of these leisure users, the narrow lane mentioned would be their access point to the National Park; it is also a wildlife corridor and it is in a tranquil rural setting with no near-by development of the type proposed.

Mr Craig Noel (planning consultant) is sending an objection on behalf of my husband, Jonathan Britton and I, but I wanted to make my personal objection in addition to this.

My objections will be outlined below and cover points to include the following headings

1. Landscape impact on landscape character and the setting of the South Downs National Park from large-scale excavation and pond construction and associated buildings including a 11m wind turbine (not outlined in the application but marked in small print on one of the plans).
2. Heritage impact on adjacent listed buildings.
3. Environmental impact to the surrounding properties and wider community, water-life and wildlife, trees and hedgerows. Included in this is risk of both flooding, and the potential impact of changes in the water table on the foundations of local properties

4. Unsuitability of the site for a fish farm
5. Lack of justification for large and permanent buildings and concern as to why such buildings are apparently needed for a business of unknown viability (see below).
6. Lack of justification for a dwelling to support the business. I understand that this residence is 'temporary' but assuming that the business is viable in three years, this could become a permanent dwelling in contravention of current planning policies for the area
7. Uncertain business viability (including high start-up costs on unsuitable site, novel farming method with uncertain outcome et).
8. Minimal benefit to the local economy in terms of job creation etc
9. Requirement for financial guarantees that the land would be fully re-instated if the business failed etc. Such provision is not in the application
10. Transport Implications
11. Inaccuracies, contradicting information and lack of details in the application e.g the description of the site as 'derelict' land. These are two fields owned remotely for many years, and poorly maintained in that time, but they are in no sense derelict. The word implies that the land is brownfield in character which it clearly is not. The proposal outlines a light industrial plant with an attached 'need' for a large dwelling to service this fish farm industry.

Landscape Impact

Core Policy CT10 of the Lewes Core Strategy section 1 outlines the need to conserve or enhance the natural environment of the district, not harm nature conservation interests, conserve or enhance local biodiversity resources etc. This application would appear to be completely failing these objectives, and the potential importance of these critical points seemed to have been missed in the application process.

The proposal is for an intensive piece of development on a relatively small site of natural farmland on a narrow lane that is clearly visible from South Downs National Park a few feet away. No professional assessment has been made on the impact from the Park, but as a regular user of the Park, it is clear the change in landscape from natural to engineered will be detrimental. (see photographs supplied by Stephen Israel in his objection letter). The proposed development would therefore seem to be in breach of Core Policy 10 in failing to conserve natural and scenic beauty as informed by the South Downs Integrated Character Assessment.

Huge earthworks would need to be used to create seven large ponds with accompanying flood defences and bunds, and there is provision for several new buildings and a 11m wind turbine.

The result would be an engineered landscape in what is currently two natural fields, and such a landscape is inconsistent with any other development in the vicinity.

The proposed site is in the Western Low Weald characterised by "abundant trees and hedges, with undulating landforms creating a sheltered, secluded countryside with strong landscape structure". The development of seven large engineered ponds, buildings, wind turbine and a

house crammed into two fields of this landscape would seem very much to be against the characteristics of this landscape, and therefore to be in direct conflict with the Core Strategy Policy outlined above.

Heritage and Environmental Impact

Amenities Impact on our Property Upper Burrells (Grade 2 listed), plus other listed properties Kemp's House and Beams or Wickham Cottage and also Burrells and Chittington House.

The land under consideration was originally owned by our house Upper Burrells which is a grade two listed property with origins from the late 17th century. The two fields being discussed were sold to another resident of the lane at least twenty years ago, and since then have been owned remotely, and not maintained. They form the rear and part of the side boundary of our site (see plan). Neither field is flat, and one slopes very steeply towards the Roman Winterbourne which is the boundary shared with Chittington House. This is worth emphasising at the beginning of this submission, as the topography of the land in itself renders the site highly inappropriate for the creation of a lake and seven huge ponds.

We thus have many concerns about how the development of this fish farm with accompanying caviar production, packaging and distribution centre, might impact directly on its heritage setting, and the wider local area.

There is no heritage assessment with this application, however,

Core Policy 11 of the The Lewes Core Strategy, states that "the local planning authority WILL safeguard historic assets such as listed buildings (Upper Burrells , Kemps House which is immediately opposite the planned entrance to the site and Beams or Wickham Cottage) ; I feel this proposal which places huge water tanks full of imported fish and all the associated disruption associated with this business would not fulfil this obligation.

The same policy 11 (ii) mentions that "the design of development within the South Downs National Park should be in accordance with park purposes, and outside the SDNP (only a few meters in the case of this site) has regard for the setting of the National Park and it's purposes. Again, I feel this would not be upheld if this development were to proceed.

This application would therefore appear to be in contradiction to the East Chittington chapter of the Lewes Local Plan 2003 (Chapter 19,) which mentions that East Chittington has "poor road access" by narrow lanes which helps to maintain it's "quiet and remote character". The application discusses the importance of landscaping and maintaining the site "as a show case for the quality of goods produced at the farm" (para 3.7.2 of application), suggesting that the intention is to encourage visitors to the site which must be in contravention of the spirit of the plan mentioned above.

- 1) The proposed buildings are very close to our property boundary and adjacent to a garden amenity area that we use very frequently. The current tranquillity here is highly likely to be disrupted by the acknowledged 24/7 activity of the processing plant, residential house etc.

There is also the noise from the 11m wind turbine which is quoted by the developer as being “not heard from 100m away”. Unfortunately, the amenity area of our listed property is less than 20 m away, so therefore WILL be affected by the noise of that turbine alone.

This application for a residence, office, processing, and distribution buildings would have a significant impact on our long-established residential amenity, and is likely to adversely impact enjoyment of this tranquil area in the future.

- 2) The disruption is likely to include both increase in noise from vehicles which would have to come up a slope from the narrow lane, and park close to our boundary. These vehicles might include those from resident and workers at the business, lorries delivering fish and supplies, distribution vehicles, visitors etc, and there is highly likely to be increased noise from these both during working hours, but also in the evenings and at weekends, as the justification for the residence is that workers will need to constantly monitor the site to pick up on pump failure, changes in water temperature etc
- 3) There is likely to be increased light pollution from buildings with day and evening activity

This would also appear to contravene the 2003 Local Plan mentioned above in that the remoteness of the lane currently means that at night it is extremely dark with very little light pollution, and none of the type likely to be generated by this 24/7 facility

- 4) There is likely to be noise pollution from pumps, machinery, generators etc. The electricity supply in this area is fairly regularly lost, so regular generator noise is likely. The application mentions that the pumps are underground, but to re circulate water around such massive ponds at such a marginal location, is highly likely to have a significant noise impact. The noise assessment provided seems incomplete (e.g effect of the wind turbine), and I believe underestimates the true impact.

As above; this is a very quiet area

- 5) There are also concerns relating to environmental pollution from aromas emanating from a fish farm. The application states that the fish are not sacrificed in the caviar harvesting process, yet there will undoubtedly be some loss of fish, and part of the process of maintaining the plant involves emptying the ponds in a rotating basis and allowing them to dry out. There are other concerns about this process which will be mentioned below, but clearly the discharge of millions of gallons of fish-polluted water has potential to result in serious aroma pollution to our very closely positioned garden amenities. Sturgeon are well know to process food poorly, so 80% of the fish food pellets will be left as waste in the ponds; also if the reed beds are not able to filter the water adequately, there will be other waste products such as phosphorus which will also provide aroma-risk as well as pollution to the water courses.

In such a rural area, we are used to normal agricultural aromas from long-standing and well tested farming practises. However, this development proposes using a completely different and novel and experimental type of fish farming. The potential for unpleasant and unnatural aromas is high, and this could be a significant blight to all the historic and leisure amenities mentioned above which I understand the Lewes Core Strategy is designed to protect.

- 6) One “ justification” for the residence is that a worker would need to be instantly available to deal with ‘site security’ and ‘to attend to predation through herons and such vermin as rats and mink’ (see para 3.7.5 of application). If this really is a possibility, we are naturally concerned about the likely increase in vermin which will affect our closely adjacent property.
- 7) At the front of our house is an ancient and very attractive pond with associated water-life and pond plants of considerable diversity. This pond is fed by water run-off from our land, and if it becomes full beyond a certain level, discharges into the ditch connecting to the Roman Winterbourne, and ultimately the Bevan Stream.

Given that the huge ponds outlined in the proposal are in a field which is higher than our property, any discharge from the ‘farm’ site, we believe would drain directly onto our land and some of it would enter our pond. This water will then contain effluent from the fish, chemicals and hormones given to the sturgeon and may also be a conduit for diseases which these imported fish may carry and which local fauna and flora have no immunity to. It seems quite possible that all of this could have a dramatic impact on the water quality and the fish, insects, animals and plants normally living around this site.

This would appear to be in contravention of Core Policy 10 of the Lewes Core Strategy. Both section 1 ii where seeking ‘not to harm nature interests’ is important in any development, and also section 4 which mentions that any development “must ENSURE that water quality is maintained and improved” and that “watercourses including groundwater flows are protected from encroachment and adverse impacts in line with

I cannot see how this could be ensured with the current proposal for such large quantities of water exposed to a non-indigenous fish species, hormones and chemicals, as described above, draining into an ancient pond on the land of a listed building, within a few meters of a National Park.

8). Potential Risk of Flooding

The application site plan shows the construction of a number of large ‘fish ponds’ in the field immediately north of our house site and outlines a closed water system re-circulating around the site. However, there is potential for leaks in such a system, and therefore leakage of polluted water (see above). Furthermore, in supplementary information provided in a e mail from the developer relating to a previous withdrawn application for the same project, (dated 15/04/16), the rotational drainage of the ponds is discussed and presumably, this would involve discharge of huge amounts of water polluted by chemicals, fish waste, bacteria and virus carried by these non-indigenous fish, hormones etc onto the surrounding land, or into the Roman Winterbourne.

As the field with these huge ponds is sited directly north of our listed site, and is topographically higher than our site, there is a possibility of flooding of this polluted water onto our land in large quantities, and this would track down to our 17th century listed house which has very minimal foundations and could be significantly damaged by such flooding. The same would be true of the house Burrells which is immediately adjacent to ours.

This risk would appear to contravene Lewes Core Strategy Policies 11 and 12 which require that applicants should “ensure that the design of the development minimises flood risk”, and also the part of Core Policy 11 discussed above concerning the safeguarding of historic and listed building.

12. Structural Damage from Excessive Extraction of Underground Water

The opposite of flooding is also a concern. As houses such as ours have no foundations, they are constantly moving in response to water table levels. There is thus a concern that extraction of underground water which is key to the success of filling the ponds etc, could well cause structural damage affecting the structure of our listed house. This could be highly damaging and has not been addressed in the application.

There is a hydrology report attached to the application but it is not reassuring in this respect as the site safety would at the very least depend on careful construction of the ponds etc , bunds etc. To date, this approach has not been apparent in the site work undertaken by the applicant (e.g construction of the test ponds without planning permission or assessment of environmental impact).

Thus for all the reasons cited above, we would request that the application is rejected to prevent the risk of damage to these heritage sites.

Wider Environmental Impact

Effect on Local Water Resources

An important underpinning premise of this application is that a sufficient amount of water can be extracted from the Roman Winterbourne (RW) adjacent to the site, to fill the huge lake and ponds to service the proposed fish farming industry. It is mentioned that gravity feed is also expected to contribute.

RW is a very small stream at best with flow most years only from late December to mid-April. It is extremely difficult to see how all the water required could possibly be extracted from this tiny source situated at the lowest level of the site, without damming the source which would have huge environmental impacts in terms of flooding, loss of water based life etc.

There is very little explanation in the application about how this extraction process would be undertaken and there is no evidence provided as far as I am aware, that the required 20.000L per day could be achieved, nor discussion of what would happen in the dry season when there is no water in the winterbourne. There is also no reference in the application about where the displaced waste water (of a similar quantity each day in a closed system), would go.

The application mentions bunds being created to contain any breach of the ponds, and my understanding is that the bund for the main holding 'lake' would be very close to the edge of this tiny stream which has sandy and easily erodible banks. I would therefore like to raise serious concern as to how these bunds can be placed so close to this natural waterway without risk of the land collapsing into the winterbourne and blocking it's course.

My understanding is also, that the Roman Winterbourne flows into the Bevern Stream which is a recognised and important site for the breeding of Sea Trout and potential pollution of the water from this fish farm industry, and loss of the flow from the Roman Winterbourne could be devastating to these important populations of indigenous fish. In particular, the risk of bacteria or viruses from newly introduced species of sturgeon to the local water could be very detrimental to naturally occurring populations including the Sea Trout mentioned here. If a dam was built to ensure adequate water for the fish farm, the upstream migration of the brown and sea trout already mentioned, would be prevented with potentially dire consequences for these populations.

There are therefore two points here relating to damage to the local landscape and natural resources by excessive extraction from the Roman Winterbourne, and the pollution risk to the indigenous species by the import of foreign fish effluent and diseases. Both points would appear to contravene the Lewes Core Strategy Policy 10 relating to preservation of natural environment and landscape character as previously described, ensuring development should not be detrimental to nature conservation interests unless the benefits clearly outweigh the risks which I feel had not been shown here, and that water quality is maintained or improved (section 2 of policy 10), and that watercourses are protected from encroachment etc which clearly had not been demonstrated in this application at present.

Unsuitability of the Site For a Fish Farm

We are absolutely not against enterprise and appropriate development which enhances local environments and may provide work for local people.

The problem with this application is that this is an entirely inappropriate site for the enterprise outlined in the application for these reasons

- Unreliable water supply
- Huge work required to create ponds
- Uncertainty of ponds retaining water so flooding risk
- Need to pump water uphill
- Damage to a natural environment and a National Park
- Damage to heritage sites
- Poor transport links

- Uncertain product due to novel farming method required but lack of fast flowing water
- No benefit to local community

This land has come to ownership of the applicant through family connections and appears to be unsuitable for the purpose outlined here. I understand that there are much more suitable sites available if this farming enterprise was the main reason for the application. However, the inclusion of a residence with this proposal, which I believe cannot be justified on any grounds, suggests a possible primary purpose of the application is to gain a permanent residence on this land.

Lack of justification for the significantly sized supporting buildings

Clearly with the novel system of sturgeon farming outlined here, there will be a need for some technical support for the site, and space to remove the eggs from the sturgeon once every two years. However, the buildings here seem excessive for a business of unknown viability (see later sections).

Also, the significant on site road way seems out of line with the size of the operation and apparently tiny increase in traffic flow described in the application.

The residence is described as temporary (though this is hardly a small mobile home as most would know it), but the other buildings are not described as such. If the business fails, then what happens to these buildings? There would certainly be pressure for them to be used for other purposes.

I would suggest that in most cases, the buildings required to support such a novel type of farming enterprise, would be small, and more obviously temporary e.g. a portacabin. Then, if the business model fails, they can easily be removed.

Here an office, processing, packing, distribution centre is described, yet the transport statement suggests minima traffic movements; these things so not seem to equate.

Lack of justification for a significant 'temporary' dwelling to support the business

The application does not provide functional need for the on-site dwelling, and certainly cannot justify the need for such a substantial one. Mention is made of the need to be available to cover emergencies at the site such as a sudden increase in vermin, or the changes in levels of water due to adverse weather conditions, but in this modern era of computerisation, it seems difficult to understand that these things could not be monitored remotely. Furthermore, if such dangers are inherent in the processes being undertaken, this in itself may cause concern that this project is not environmentally safe and viable (all points covered elsewhere).

There is also no detail in the application with regard to the amenities required by a dwelling such as sewage disposal, or mention of the traffic generated by it. It does not specifically state that this is a property only tied to the business discussed here. Could this be a route to gain a residential property on a site which would not otherwise gain planning permission for one?

The land was previously owned by family members of the current applicant and he lived in Chilton Lane for some of his childhood / adolescent period. The family have long-stated their desire to build a residence in these fields in spite of the lack of suitable access from the narrow lane etc, and contrary to all the planning policies discussed here.

Thus, it is highly possible that the current and ill-justified 'need' for a large residence on this site, could be related to this, and that the residence is in fact the primary cause for the application.

There are relevant planning policies in this to cover this aspect of the application and these include the Core Strategy Local Plan Part 1 (2016), and the Lewes District Local Plan 2003.

The relevance of these are outlined in the letter objecting to the proposal being sent to you by Mr Craig Noel on behalf of myself and my husband but in short, as I understand it this site is not within the planning boundaries, and therefore any proposed development should be tightly controlled.

I understand that Lewes currently do not have a shortfall of land for housing, so therefore the policies should be applied in the normal way.

If development could occur here, it would need to show special circumstances and functional and financial tests have been applied by the applicant to justify this. This again is covered in full in Mr Noel's objection letter, but I want to reiterate here that we believe that there is no functional need for the residence as similar cover could be provided by a worker living within one of the local villages, or towns, when they could be on-site within minutes of any sudden change in circumstances with the sturgeon tanks e.g. Cooksbridge which is 3 minutes away and has available housing. Also CCTV etc could be used for security and the vast majority of businesses with more valuable stock that proposed here, are able to organise adequate security without residential staff.

That this option has not been investigated by the applicant seems odd, and is a clear deficiency in this proposal.

I believe that the need for a dwelling is unproven. It is not clear exactly why people are required to be on the site full time, and if the dangers are such that they have to be there 24/7, these need to be more precisely outlined for full consideration of the safety or otherwise of this enterprise. If a property is required, then I would suggest that it should be much smaller and tied to the business as well as temporary, to guard against this being a route to gaining a permanent dwelling via the back door.

The financial case for justification for these special circumstances has also not been made as the financial viability of the proposed scheme is unknown as the cited existing business model involves a different type of caviar farming; the Exmoor Farm is also known to be at risk (e mails

from applicant to Mr Hill April 2016), and the holding company London Fine Foods trades in, but does not produce caviar.

To summarise this section. I can see no case for a residence to be associated with the fish farm and feel that the likelihood is that the applicant and his family wish to use the business to gain a residence 'by the back door', thus fulfilling a long-standing ambition to build a house on this land. My understanding that there is no planning justification for such a house in absence of an essential need, and that to allow it to be built would contravene all current planning policies in the area.

If the business were to go ahead, there must be absolute certainty that the house is tied to it, and cannot remain if the business folds.

Uncertain business viability

This will be covered in detail by others including my husband Jonathan Britton.

My summary is that

1. We have no financial data to show if this is a viable business and that the assertion in the summary of the application that the enterprise is based on the proven model of the Devon farm is not true
 - There are no visible accounts for that project, so we are unaware of how sustainable the sturgeon farm there really is.
 - Little is known about exactly how the farm in Devon works and it's location is a closely guarded secret which seems unusual for a business of this type. This seems to run contrary to the applicant's plans for East Chiltonton where visitors are to be welcomed it seems, as the suburban style of landscaping proposed is deemed necessary "to keep the site in pristine condition at all times as a show case for the quality of goods produced at the farm" (paragraph 3.7.2 of the application). Public information about the Devon farm suggest that there are 20,000 to 30,000 fish on that site (The Telegraph 14/09/16), but only 200 or so are contemplated for the farm in this application. This seems rather odd and the potential gain from that number of fish, even if the egg extraction is effective, and the caviar is good, seems low.
 - The applicant cites in several places, the importance of the "flow-through" nature of the water used in Devon which results in a particular type of high-grade caviar see Exmoor Caviar Web site). This free flowing water is not available here, and we believe therefore that there is no guarantee of success, and a high risk of failure especially given that previous farms using this technology, I believe have been reported as having difficulties (see submission to you from Jonathan Britton).
 - Due to the unsuitable nature of the site, the set up and building costs will be high
 - A financial assurance to restore the land to it's current state if the business were to fail is required (see Mr Noel's letter to you)
 - As this enterprise is neither conventional nor well established, there is no financial justification for the need for a dwelling to support it

The applicant states

“The mouth of the sturgeon is at the bottom of its head, so they eat everything from the bottom of whatever body of water they’re in,’ he explains. 'If that water is stagnant, it will go into the taste of the fish and the caviar” (The Telegraph 14/0916)

This suggests that the applicant himself knows that the product likely to come from the Sussex farm is going to be inferior, and with only a few hundred fish rather than the 10’s of thousands said to be in Devon, the feasibility as a business model must be in question

Based on the lack of information and the rather limited publically available data for the Exmoor Caviar, then I have serious concerns that this is a viable business being proposed and am increasingly concerned that the aim is to gain a residence as the principle aim for the project.

If it is allowed to proceed, there is strong risk that the only legacy will be scarring to the landscape.

Minimal benefit to the local economy in terms of job creation etc

I can see no benefit to the local economy or employment from this proposal which will employ either one or two full time staff (variously outlined in the application, with the final product presented for sale in London (see transport statement).

Thus, from a local planning perspective, in terms of providing sustainable employment in the countryside, I do not believe this project will make a meaningful contribution, and may cause significant damage if it is allowed to proceed.

Requirement for financial guarantees that the land would be fully re-instated if the business failed etc. Such provision is not in the application

As outlined in other areas of this letter, there is a very high risk of business failure in this case and, as far as I am aware, there is no information in the public domain to assure us that this is not the case at present.

Mr Craig Noel outlines the need for a bond secured via s 106 obligation and I would strongly endorse this requirement.

Transport Implications

The transport implications for this development have been mentioned in points above, and the transport report with application indicates that there will be a ‘small’ increase in traffic if the development were to occur.

There is no mention anywhere in the statement of how the fish are brought to the farm, nor is any provision made for the waste removal from the reed beds (see OART submission 15/09/16) and discussed in later sections of this submission. This could involve regular tanker loads of waste removal.

These omissions and other inaccuracies make it difficult to judge exactly this traffic increase. E.g the transport summary mentions a total of 4 car parking spaces, but the body of the transport statement only cites 2.

It is unclear exactly the nature of the use of the site in that the application suggests that the very suburban type of landscaping is required “to show-case” the site but yet it also says that it is not to be open to the public, and the only journeys will be occasional for delivery of fish feed and removal of the packaged caviar at the end of the production. However, a large house appears to be required and this alone would generate a certain amount of traffic, and there will be workers going to and from the site.

The transport report states that access to the site will be through the existing gateway which will be widened via the existing hedge, and it also states that there is good visibility in both directions from that point. This is not true as from the current gate entrance, there is very little visibility of the lane in either direction from 2.4 metres back from the road into the area of the proposed entrance (see photo's below which incidentally show how close the entrance is to the listed building Kemp's House).





If this access is to be used

- a) The hedges would have to be significantly cut back and probably removed to allow any degree of safety from vehicles exiting the site
- b) There will be a great deal of disruption to the residents at Burrells as this is very close to their house, entrance and quiet garden and they will be overlooked by the traffic
- c) Similarly for the house across the road Kemps House (a listed property)
- d) The area of the lorry turning circle would have to be wide, very close to the adjacent property
- e) It is directly opposite and very close to the SDNP and the access and buildings will be visible from that.

The photographs in the application showing the lane are taken in winter when there is very little foliage on the hedgerows and trees and give a very optimistic view of the difficulties which would be faced by users to the site, and of the dangers potentially generated from the significant increase in traffic which is likely.

As discussed above, the Lewes Local Plan chapter for East Chiltington (Chapter 19), emphasises the remoteness of the area, and the narrowness of the lanes, and the need to protect this isolation in the future. This application would appear to breach this in its potential for significantly increasing the amount of vehicles on tiny lanes, including a number of large lorries for feed and fish delivery, removal of waste products from the ponds etc. The large house proposed would also generate a significant extra traffic burden on these small, narrow and inaccessible lanes.

Furthermore, Lewes Core Strategy policy 13 discusses sustainable travel and the need to promote development which reduces reliance on vehicle journeys, that prioritises the needs of pedestrians, cyclists (horse riders) etc over the ease of access by the motorist and minimises the need to travel.

It is difficult to see how the current proposal is in keeping with these objectives and therefore I would suggest that this is an unsustainable development for this inappropriate site in a remote and protected area.

Inaccuracies in the Application

Several of these have been mentioned above including the poor transport statement, inaccurate completion of the survey relating to wildlife, trees etc.

I have picked out points from the application section as stated

1.2 The site is variously described as a redundant parcel of land, or derelict land. Neither is really appropriate. As discussed at the beginning of this submission, the fields were previously owned in conjunction with our house, and are similar in size to the field which we still own and which has been fully maintained throughout the past twenty years. The fields in the application are topographically different in that they are much less flat, but have similar hedging, native grass etc as many fields in this surrounding area and provide part of the rural backdrop of this beautiful and tranquil part of Sussex. As mentioned before, this land had been owned remotely by family members of the current applicant, and during their ownership, the land and hedges etc have been only intermittently maintained and the site has been used for activities such as the building of a BMX bike track.

The fields are therefore not derelict but an integral part of the rural area and are directly visible and adjacent to the SDNP. They provide part of the landscape character of the area which we all value so much, and if this development were to take place it would provide consolidation of "built form" in a remote location which would seem contradictory to the Lewes Local Plan policy for East Chiltington, and the Core Policies of the Lewes Strategic Plan already discussed.

3.3 States that the site has been chosen for its soil structure which is "ideally suited to water retention within the ponds". In fact local residents have reported that this is not the case, that there has been leakage from the current pond (constructed without planning permission and with no attention to environmental damage), and that the water from the pond drains to the level of the natural water table.

What is also not stated is that the site is highly **UNSUITABLE** as a fish farm as it is steeply sloping with the tiny and intermittent water source at the lowest level of the site (see section on this above). As mentioned by Harry Haskell, a local resident and angling expert and writer, all the fish farms which he is aware of (many), are located on flat land which is important as water will find its own level.

The submission from the Ouse and Adur Rivers Trust (OART) to you (15/09/16) indicates their professional concerns about this water extraction and also expresses extreme concern that the reed beds which are supposed to filter this water will not work, resulting in very high levels of

phosphate which may damage the local watercourses and the fish and other aquatic life which depends on them.

Millions of gallons of water will be collected in ponds / a lake on this site, and there is little detail to explain how the structures will contain this. There is limited detail in the application about how the ponds would be built, and how potential risks to the lower-sited neighbouring properties in terms of flooding (Chiltington House, Upper Burrell and Burrells in particular), will be mitigated.

- 3.7.4 The need for a supervisory dwelling. In my opinion that has not been adequately covered or justified but this has been considered separately in this submission.
- 3.7.7 Which states that financially the business is sound having traded profitably for 14 years in Devon with accounts showing enterprise viability.

There are a number of inaccuracies / omissions here

1. The business in Devon is based on a completely different model of caviar farming as discussed by the applicant in his e-mail to you and dated 15/04/16. The farm in Devon is a “flow through site” (much merit is placed on this on the website, and the fact that it produces very special high quality caviar), where the sturgeon are killed as part of the farming method.
2. We understand from the applicant’s statement that all the financial details of this proposed enterprise are sensitive and will be provided to you confidentially, but it is essential that such an experimental business with such significant impact is properly justified.
3. The method of extracting caviar as discussed here is experimental in that it has not been used in the UK before, and has produced extremely variable results elsewhere in the world with some evidence suggesting that the product is very inferior to that from the free flow method, and possibly, commercially useless.

Thus the commercial viability of this enterprise is unknown, and definitely unproven which would seem fundamentally at odds with the National Planning Policy Framework Section 7 which discusses the need for SUSTAINABLE development which protects and enhances our natural, built and historic environment, (not as in this application which may cause damage to all of these. Furthermore, NPPF section 109 which discusses valued landscapes, minimising impact on biodiversity (use of imported fish with imported diseases etc) seems relevant and not in keeping with this application.

- 3.7.8 Three years would seem an inappropriately short time to assess viability of this untested farming method (see above plus other submissions in particular that from Jonathan Britton). Development of the site itself will take many months I assume (no details of the development process and constraints on the process have been provided), the sturgeon can only produce caviar after a long incubation process etc. Thus I believe this is far too short a time scale for consideration of a permanent dwelling on this remote site.

What are the safeguards if the business fails? How is the site restored to its current use? Is the property only tied to the farm etc. There are many unanswered questions here which need to be addressed before the full implications of this application can be established.

4.0 to 4.3.5 Planning Policies.

As stated throughout this document, in many areas of the NPPF, Lewes Local Plan and Lewes Core Strategy, this application does not meet the requirements for a sustainable business sited in an appropriate setting with an acceptable environmental impact.

In particular para 4.3.4 which discusses the NPPF and the design of the built environment and the care taken in the application to be sympathetic to the character and landscape of the area. I believe many areas of this submission show this to be a gross inaccuracy.

5.1 The applicant's feasibility study as apparently 'confidential' which makes it difficult for us the know too much about what is proposed. Interesting also that the site in Devon is at a 'secret' location as discussed in various articles...

According to public information and quotes from the applicant and other, there are 20,000 to 30,000 sturgeon at that site to produce the very special caviar from the free-flowing water / kill method of caviar farming.

We believe that there will be 200 sturgeon only in East Sussex, and they can give the caviar if all goes well, once every two years. The method used is novel to the uk and has not been a commercial success elsewhere.

As previously stated, set up costs are high (also mentioned by the applicant as a plus for the Devon farm as it was already there as a trout farm etc)), there is a considerable amount of new building involved etc.

Even without access to the feasibility study, a little research might suggest that the finances of this are looking difficult and there is NO evidence that it is a sustainable business in this location.

6.0 Summary of the Application

I believe all of the summary points 6.1 to 6.5 in the application are **untrue or at best, misleading**

6.1 "Sustainable farming" – see above plus submission from Jonathan Britton

6.2 "Proven model from Devon". Also untrue (see above plus submission from Jonathan Britton

6.3 "Acceptable under planning policy". Untrue (see above and submission on our behalf by Mr Craig Noel)

6.4 "Supporting evidence showing no harm".

Compared to the previous application for a very similar scheme which was withdrawn (May 2016), there is more material provided in certain areas in this application. However, I believe much of it is still incomplete or misleading. For example, the noise survey does not mention that the wind turbine (not written into the application text itself), cannot be heard further than 100 m away (quote from applicant), yet there is a heritage site and the SDNP much closer than 100m to it.

There is no heritage assessment in spite of nearby listed buildings which may have their structures damaged by removal or excess of underground water etc.

Another issue not previously covered relates to OART's concern with the lack of effectiveness of the reed beds. I have not mentioned that this could result in large quantities of waste products such as uneaten food, phosphorus etc having to be dredged from the ponds and transported away further increasing traffic flow, noise, damage to the environment etc.

So these, and other issues which either have not been mentioned suggest that section 6.4 is also misleading

6.5 "There are compelling reasons to grant planning permission etc"

I believe very strongly that there are NO reasons for granting this planning application, and hope that I have fully outlined my objections in this letter.

I would hope that all these points will be closely considered in the decision making process as I believe it gives evidence of the poor nature of this application to gain approval for a potentially damaging ***and non-viable enterprise in an unsuitable location to the detriment of the local population and environment.***

Summary of this Submission

In this submission, I have aimed to provide you with my thoughts on the potential harm which may result to our local landscape, tranquillity, residents and buildings if the planning application for this fish farming industry is passed.

I hope that all the points given will be carefully considered and that the huge number of questions relating to the landscape, environment, heritage, lack of local benefit, sustainability, site unsuitability, transport etc which are thrown up by this application will give cause for concern that this enterprise is NOT one which is appropriate this quiet and tranquil area so close to the SDNP and historic listed buildings, and in which many endangered and protected species are currently thriving.

Your Sincerely,

Helen Britton

