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To Andrew Hill LDC Planning Officer - Re **Planning Application LW/16/0695**

Dear Mr Hill

Because the above application is so unusual, it is unlikely that your Planning Committee have experience regarding the implications of this application - should permission be granted. Therefore, my submission is that this proposal is given extra consideration, and not simply 'rubber stamped' under the National Planning Police Frameworks 'Presumption in Favour.' The reasons are as follows.

The Site. I know of no other UK fish farms which exist on such an unsuitable elevated site, and Ben Woodward of Universal Aquaculture Ltd (being the most likely contractors, should permission be granted) confirmed to me that, **he had no previous experience of building sturgeon farms.**

The Sturgeon. This alien non native fish will carry pathogens (bacteria and virus) to which the native fish (around eleven species, including sea trout) found in the Bevern Stream - which is fed by the winterbourne brook bordering the site, will have no immunity to. EA health checks are limited in their scope, and there's a long history of 'health certified stock fish'- causing deaths to resident fish. Sturgeon, are also unusually problematic to retain in holding ponds. The two major problems here being, **its sensitivity to oxygen levels and its inability to digest more than 20% of its pellet food rations** (half that of say carp) - this means **it produces 80% of toxic polluting waste matter.** Established successful sturgeon farms are **invariably alongside fast flowing, clear, and highly oxygenated rivers. Indeed, the applicant as MD of London Fine Foods Group supports this view and derides those using a closed loop system,** (click on Exmoor Caviar) - **Yet this is what's being proposed!**

Caviar. The recognised 'Gold Standard Caviar' comes from the Russian Beluga Great Sturgeon which feeds on a natural diet in the sea and then migrates up river. By definition, medicated pellet fed fish, kept in ponds, produce inferior eggs in terms of taste and quality. Even more so, when using the muddy waters found on the proposed site. **This explains, if such a speculative venture was so valid, why there aren't numerous other UK caviar farms?**

Under Core Policy 10 and retained Policies CT1 and ST3. Application LW/16/0695 **is inappropriate development,** and will have a negative effect on the 'Natural Environment and Landscape Character' of this area, which falls within the 'Setting' of the South Downs National Park.

Supporting Documents. For some reason, these biased documents contain misinformation, errors and omissions, which brings into question their credibility and integrity. Below are a few examples.

David Campion - Agricultural Supporting Statement and Planning Policy Analysis.

1.2 He considers this land to be **redundant** - which it may well be in commercial terms. However, it is this very redundancy which makes it a haven for wildlife. There is a lack of understanding that,

wildlife flourishes on decay and neglect, and even more so with the absence of human activity. I submit that, these ancient fields, acting as an important buffer between two properties; have a value to the local community, and to those that use this area for recreation, which far exceeds any commercial considerations.

3.4 ‘The enterprise is thus entirely sustainable and ethical’ I doubt it’s sustainability, and find nothing **ethical** about keeping five foot long sturgeon in a muddy pond. This fish normally lives in the sea feeding on a natural diet of molluscs, shrimp etc, and migrates up fast flowing rivers – like say salmon.

4.2 ‘permission should be granted unless any adverse impacts of doing so outweigh the benefits.’ This speculative venture offers no employment, and the only one to benefit will be the applicant and family. The Parish of East Chiltonton will have lost yet another important wildlife habitat, and be the poorer for it. And I will have lost my nightingale, which as the twilight fades on a summers evening, has sung his song for many decades, from the copse adjoining the proposed site.

5.2 The Feasibility Study (by the applicant) was for some reason confidential and thus not shown.

5.3 The Transport Assessment concludes that, ‘following development there may be a slight increase in traffic’. There will obviously be months of contractors coming and going, and after completion there will be an unknown amount of movements. Though as a ‘showcase to clients’ this may be considerable, added to which there will be ongoing lorries, and vans servicing the site. The lane near the site, has a drivable width of only around 3.5m.

5.5 The Use of Drugs. ‘there is no ongoing hazard, even if poured into the water’ I understand concerns were raised about feed growth promoters and hormone stimulators. Whilst I believe the risk is small, they introduce, as above, a potential hazard which is currently nonexistent. There is a precedent whereby, some 30yrs ago, anglers fishing the lower Hampshire Avon at Christchurch began catching barbel (*Barbus barbus*) normally having four barbs, which had either grown additional ones, or they were branched and deformed. This period coincided with an upstream increase of trout farms being established. Fishery scientist investigated this phenomenon over a number of years without coming to any firm conclusions; other than it was likely to be linked to the then common practice of trout farms flushing out their stew ponds directly into the river. Restrictions followed.

5.8 Arboricultural Impact Assessment. Detail of ancient hedgerow removal is unclear, but it will require planning permission.

5.12 Noise Assessment. As the detailed specifications relating to the pumps, generator and wind turbine etc, is missing; the conclusion seems to be based on estimation only.

5.15 The Aquaponics Report. This report is I feel little more than an advert for the company which admits to having no experience using this technology for caviar production, and seems flawed in part where it relates to this site. For aquaponics to work everything has to be in balance. The required uphill pumped flow rate from the lower water holding pond to the main sturgeon holding ponds, is neither known nor shown; the same applies to the downhill gravity flow. If more water is pumped out than is being returned, the lower water holding pond level will fall. It is known that the gravity returning water passes through filter beds, which have a history of clogging up. Fish feed specification is missing. It’s claimed by feed producers, that surgeon ingest less than 20% of their rations, this means that **80% ends as waste matter**. This unusually high amount, may well lead to an excess of nutrients, far beyond that which can be taken up by the plants – thus the system becomes unbalanced. In addition, there remains doubt that it will be a ‘true enclosed system’ as the lower water holding pond’s base seems to be at water table level. Our local water table goes up and down

and the pressure can push it through the lanes surface. Thus it will easily puncture clay puddling, and /or lift liners. What goes in goes out again - thus it does not as claimed 'eliminate the risk of waste water returning to the local waterways.' **Furthermore, there is risk of flash flooding of surface water, overpowering the 'French drains' and entering the lower water holding pond, or even the winterborne.**

5.15 The Ecological Appraisal. (Campion – Phlorum) 'The proposed development will enhance biodiversity within the site and increase opportunities for wildlife.' Enhancement to the site is not a current requirement, but will be following the proposed vandalism – though its total value will be less than what exists now.

Phlorum - Ecological Appraisal. Their data search (in parts) is poor and unrepresentative.

3.16 Note. Pond water was found heavily turbid.

3.21 Reptiles. A slow worm was seen at Deer Park Cottage (approx 250m North of site) July 2016 grass snakes and common lizards have also been found here in past years.

3.24. Birds. Phlorum have used an unrepresentative area which shows a total of 13 notable bird species (those at risk) **The British Trust for Ornithology (BTO) is UKs most authoritative organisation relating to bird records. Unlike Phlorum - they realise birds have wings, and use a 1km Square grid as being representative. BTO records show for Tetrad TQ 3815 - 2012-2016 87 species of which 38 are notable birds (the at risk red or amber list)** The BTO also realise that, any development or disturbance within their grid- will result in a downgrading and displacement of bird species using the area.

3.36. Great Crested Newts (and other Amphibians). Phlorum claim the closest one located in 2005 at a distance of 2km. **There is in fact a secret breeding pond within 200m of the site!** This old pond's location will be made available (in strict confidence) if requested by LDC. Photographs of these breeding great crested newts were taken during the 2016 summer. Other evidence includes a picture of a GC Newt taken at Hurst Barns Cottages in 2016 approx **150m from the site**, and GC Newts have been found on numerous occasions at Burrells being **adjacent to the site** (top southern end) over many past years. **The evidence clearly indicates that the GC Newts use, and cross the proposed development site from north to south, and vice-versa, and have done so for many years.** **Other amphibians.** At Deer Park Cottage (approx 250m from site) our frogs and those in the area have declined in recent years (once there were hundreds) though one was found in Sept 2016. Our toad had babies this summer. Thus Phlorums 3.38 – 3.39 – 5.13 is in error.

3.48-3.49 Invasive Non-Native Species. Himalayan Balsam is to found within 250m of the site.

5.8 The harm caused to the environment, clearly outweighs the negligible benefit of the new proposed development.

5.4 Beehive. There is no need for a bee hive (common honey bee) as there exists locally, healthy wild bee populations of various species - including the buff tailed bumble bee.

Campion. Summary

6.2. The enterprise is **NOT** based on the applicants current proven model in Devon in any way. The Devon site uses millions of Litres of fresh clear fast flowing water. The proposal is for an untested 'enclosed loop system' via clay ponds, which will become turbid.

6.4 The supporting evidence is biased and flawed.

Buildings and structures. Saved Policy ST3. This development will have a **negative** impact on neighbouring amenities – there are no gains here. For the purpose of providing accommodation on site for 1 person, a multi bedroom dwelling is not required, and its square area could be reduced by 50%. All the plans supplied (including the above) – lack detail and are shown in unreadable font size. It seems now the circle marked ‘wind turbine’ is to be (according to the newspapers) **11m high (+35feet)** and will be an eyesore and a noise irritant. There are no other details of this structure.

Automatic systems are available to operate the entire proposal - thus there is no need for anyone to stay overnight.

Security and Risk Assessment.

Gangs and individuals involved in illegally importing mostly carp, catfish, and ornamental fish, have for several decades operated within the Home Counties (the nearest known individuals are Crawley residence.) They also steal fish to order from local and private waters - which often end up in commercial fisheries. These fish are valuable - for instance, an English born and bred 30lb+ common carp may be worth £2,000 + Forty pounders have been traded at £3,000. Large sturgeon would be desired by commercial fisheries. Some of these thieves have a history of violence, and one person staying overnight on the proposed site, could be at personal risk.

The entire site requires high security fencing, detectors, alarms, flood lighting, and CCTV linked to the Police. In addition, a failed mission by the thieves, may result in opportunistic theft from neighbouring properties. This development if passed, **would introduce a serious risk which does not currently exist.**

Summary.

1. It has been common knowledge for many years that, the applicant’s family have always wished to build a large family dwelling on this site.
2. The proposal contravenes **Core Policy 10 and saved policy CT1.**
3. The supporting documents **are biased and flawed** – a few examples are given above.
4. Detail is missing and the **applicant has failed** to show his proposal will ever function.
5. Only the applicant gains, at the cost of **wildlife displacement and habitat destruction.**
6. There will be an **increase in traffic movements** far above that stated.
7. This development **introduces numerous risks (some serious)** which currently do not exist.
8. What happens after three years? And, in the event of failure - **who pays for reinstatement?**
9. If successful, an **important buffer zone will be lost**; East Chiltoningon Parish, local residents, and the many others who use these lanes, will be all the poorer.
10. Following permission, there will be **years of ongoing complaints, an increase in Council work load and costs to the tax payer.**
11. The Argus Sep 10th 2016. Mr Benning said, ‘**If you don’t like it, don’t live there**’

Conclusion.

I therefore respectfully ask that, the Planning Officer and the Planning Committee reject application LW/16/0695 outright.

Yours sincerely

Harry Haskell - Sept 15th 2016.

