

The Planning Officer
Planning Application LW/16/0695

andrew.hill@lewes.gov.uk

Dear Mr Hill

I wish to object to the above planning application on the following grounds:-

1 LDC Planning Policy

The LDC local plan for East Chilmington (Section 19) says that:

“East Chilmington is one of the most thinly populated parishes in the district, its poor road access by narrow lanes helps to retain its quiet and remote character. The key issue will be to retain this relative isolation in the future.”

Chilmington Lane is a narrow country lane, 3.4metres wide at the proposed site entrance. It is used by residents, walkers, cyclists, horse riders, and by occasional tractors. It offers particularly poorly sighted road access and exit via a hidden field gate to and from the proposed site, this makes it a serious and dangerous hazard to all road users. This is obvious to all except East Sussex Highways apparently.

The NPPF encourages planners to be more open to development, **but it also cautions carefully about protecting that which should be protected.** This application violates that part of the NPPF in view of the site selected for this fish farm/factory.

The Lewes Core Strategy Policy - 2.15 Key sustainability issues statement makes much of the importance of sustainability in the development of land and water and the preservation of the environment. This application fails this policy totally. **Its effect on changes to the water table will directly affect the foundations of listed and other 17C buildings close to the site. In addition it fails to preserve the environment totally by destroying two fallow (not derelict) meadows containing flora and fauna common to this area of East Chilmington.**

2 Proximity to dwellings causing loss of amenity.

It is a proposal for an experimental fish factory and processing and packaging plant sited in the countryside, too close to a small historic settlement of six homes, destroying their amenity, peace and tranquility.

The proposal includes

A temporary home (carefully and beguilingly defined as a caravan in a separate report) with three bedrooms to house one worker.

An associated second temporary one storey building is also to be constructed.

This temporary building houses fish processing areas and associated tank equipment, along with a fish food store, office and a packaging and despatch area.

Also, within the lower field, the application proposes a large 5M deep unlined pond for water storage adjacent to the stream, and at the foot of a steep incline, and a huge 5M high earthen bund stretching along the very edge of the Romans Winterbourne stream.

In the upper field, a further 4 four deep unlined ponds for sturgeon, a screen, a biological sludge removal plant, and associated sludge tank, and an open surface-discharged vertical reed bed and a duckweed and lily pond.

All this is too close to existing homes and represents a serious loss of amenity-providing a 24 hour permanent nuisance, disturbance and noise from powerful pumps and a large windmill generator to the families who live there.

3 Pollution Risk to Romans Winterbourne and The Bevern streams

This is an experimental proposal for a recirculating fish farm using a quasi-aquaculture setup, and the first of its kind in the UK.

Sturgeon fish are bottom feeders and when farmed are fed on specially formulated sinking food pellets.

Uneaten pellets and fish excrement will gather on the bottom of the four containing ponds and will have to be constantly washed out and away by flowing water. Solid wastes can be removed by screening filters, by bio-filter, and by vertical reed bed filters.

However, these filters cannot remove any dissolved vitamins or growth hormones added by fish food suppliers to enhance fish growth. Equally they cannot remove any excreted remnants of antibiotics in suspension added by vets to treat fish diseases. These dissolved additions could therefore be returned to the holding freshwater pond for recycling back into the system. More importantly, the dissolved elements could also leak into the ground water table below the bund and leach into the Romans Winterbourne stream causing damage and disease to its native sea trout, brown trout, coarse fish and its natural water life in all its forms.

4 Practical viability of system

This proposal is still an experiment. While the developer may well be able to show evidence of financial feasibility and financial viability, **there is as yet, the unproven practical viability of this circulating aquaculture system. If minded to approve the application LDC planning committee members would be wise to seek assurances from the developer and a financial bond to cover the cost of full site reinstatement in the event of failure, or eventual natural ending of the fish farm project.**

5 In Summary then:

It ignores NPPG recommendations on sustainability.

It ignores the Lewes Core Strategy on sustainability.

It ignores the Lewes district local plan for East Chilmington (sect 19)

It damages amenity for heritage buildings and other neighbouring homes.

It presents a serious pollution threat to the Winterbourne and Bevern streams.

It lacks any plan or bond for reinstatement of the land after this use.

This is a LDC planning responsibility, but an unusual and an important one, perhaps setting a national precedent for this sort of activity in the future.

Thank you for the opportunity to express my concerns.

John Anderson
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