
Sandgate Nurseries, Henfield

Response to Natural England comments

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Job Number: **30512**

Date	Revision	Notes/Amendments/Issue Purpose
October 2024	1	Response to comments

1 Natural England Comments

The Natural England (NE) have provided comments on the Flood Risk Assessment, Drainage Strategy and Water Neutrality report that was submitted as part of the outline planning application (Ref: DC/23/0189). The comments are set out below:

1. Proposed Business/Industry Water Use

Natural England notes that the proposal includes the construction of community facilities including a medical centre and on-site laundry and catering facilities. However, the water consumption of these facilities have not been included in the water budget. We therefore advise that additional information is provided outlining the proposed water use of these business operations, such as bespoke values based on reasonable evidence and investigation, or water usage figures based on appropriate industry standard rates / an appropriate statement of water use from similar business. As competent authority, Natural England would advise that you should be satisfied that the proposed water usage values for the commercial elements are accurate and based upon reasonable and well evidenced assumptions. We would also reiterate that, in order to ensure that the proposed development does not result in a net increase in water usage, that all development, including any non-residential development, are required to be included in the water budget.

2. Water Efficiency Measures and Smart Meters

Natural England notes that the applicant proposes that water efficient and smart metering devices will be provided to reduce the proposed water usage to 85 l/p/d. Whilst water efficient fixtures and fittings can be used to reduce water consumption, we advise that smart meters do not ensure that water usage will be reduced (rather they are a means for individuals to monitor water usage), and we would therefore advise that they should not be considered within the applicant's mitigation strategy. Instead, the proposed mitigation strategy should rely on suitable water reduction measures such as efficient fittings and fixtures, rainwater harvesting and greywater recycling etc.

Natural England advise that any water efficiency measures required to achieve the proposed water usage of 85 l/p/d will need to be appropriately secured with the competent authority, in perpetuity.

3. Rainwater Harvesting

Natural England notes that the applicant proposes that the water required for toilets, washing machines and external use will be provided through rainwater harvesting (RwH). The applicant states that this equates to 40 % of the site's proposed water demand. Whilst RwH can be used to offset the predicted water usage, the amount of offsetting being proposed lacks reasonable supporting evidence. Further information is required, such as local rainfall data, size of the collectable area and the efficiency of the proposed RwH system's rainwater collection to demonstrate the volume of water that can be provided by RwH. We advise that drought contingency requirements should also be factored into the WN budget or it should be made evident that drought contingency can be wholly supplied without mains connection, such as through the use of appropriately sized storage tanks.

4. Groundwater Abstraction Borehole

Natural England advise that the proposed approach to supplying potable water to the development, via a groundwater abstraction borehole is not suitable to be accepted at the appropriate assessment stage of a HRA. Primarily this is because there is uncertainty about whether the development will still be served by the mains water supply or not, and how any abstracted groundwater would be treated and then supplied to the development. The following advice is also provided on the basis that the proposed borehole would not be sunk within the Folkestone Formation or any of the other geological units which the Environment Agency advises against.

The applicant's Hydrogeological Assessment dated 4 January 2024 (Appendix H of the Flood Risk Assessment, Drainage Strategy and Water Neutrality Report) states that "all potable water used in the development will be sent northwards for treatment at Henfield Waste Water Treatment Works (WwTW)". However, if the water abstracted from the borehole is to be sent to Henfield WwTW, this implies that the development will need to receive its potable water through a mains supply instead. The Water Neutrality Statement also appears to support this assumption, "new potable water mains will be required to serve the proposed development" (paragraph 9.2).

Having reviewed the water neutrality statement, it is unclear as to how any impacts associated with an increased reliance upon the mains water supply will be appropriately mitigated (beyond reducing water usage via efficient fittings and fixtures). It is Natural England's advice that abstracting water via the proposed borehole, and then sending it to Henfield WwTW is not an appropriate means of offsetting any potable water supplied via a mains connection.

If however, the applicant intends to abstract water via the borehole and then treat it at a private water treatment plant (i.e., a different scenario to one outlined above, and as alluded to in paragraph 9.8) and avoid a connection to the mains water supply, then we would advise that your authority should be satisfied that any water intended for potable use can be treated in accordance with Private Water Supplies (England) Regulations 2016, as amended. As competent authority, it is your responsibility to ensure that you are satisfied that the water supplied by the borehole can be treated appropriately in order to avoid a reliance upon the mains water supply. Natural England would also advise that your authority will need to secure the management, maintenance and monitoring of the private water supply, in perpetuity.

2 P&M Responses

1. The proposals for the medical centre and on-site laundry and catering facilities are outline only at this stage. Therefore, it is not possible to accurately calculate the proposed water use of these business operations. An increased water demand figure has been added to the report based on some assumptions. This does not alter the conclusions of the report which state that the water yield from the borehole was 5.4 m³/hour which is comfortably enough to serve the proposed development.
2. The reference to smart meters has been removed from the Flood Risk Assessment, Drainage Strategy and Water Neutrality report.

Water reduction measures are not required as the potable water demand from the development can be served by the groundwater abstraction borehole and on-site treatment plant which will not impact the Sussex North Water Supply Zone.

If water reduction measures are considered to still be required, we would request that the detail of the water efficiency measures is secured at the next design stage by a suitably worded planning condition. The internal layouts of the proposed buildings have not yet been designed and so it is not possible to provide any detail on the proposed water efficient fixtures and fittings at this stage.

3. It is proposed to supply the potable water from the development via a groundwater abstraction borehole and an on-site treatment plant. Therefore, the development does not require rainwater harvesting in order to protect the Sussex North Water Supply Zone.

In addition, the development layout is indicative as the planning application is outline only. Detailed calculations for rainwater harvesting tanks could be carried out at the next design stage once the proposed masterplan has been finalised, if necessary.

4. The potable water from the development will be supplied via a groundwater abstraction borehole and an on-site treatment plant. A connection to the mains water is not required.

The water that will be abstracted from the borehole will eventually connect to Henfield WwTW in the form of foul water, after the potable water has been used. This is set out in Section 8 (Foul Water Assessment) of the report. The proposal is not to send abstracted water directly to Henfield WwTW.

The comment that stated "new potable water mains will be required to serve the proposed development" has been removed from the report.

A design for the water treatment plant has been produced and is available in Appendix I of the report. We would request that the details of the management, maintenance and monitoring of the water treatment plant is secured by a suitably worded planning condition.