



Sent by Email:



26th June 2024

Vitacress Salads Ltd

Application reference: P.5767/H/95/V001 & P.5768/H/95/V001

Thank you for your Request for Information dated 20th June 2024. VSL is pleased to provide the following information via WeTransfer.

The documents listed below have been amended or added to the Vitacress permit application pack. Please note that all documents labelled as V3 supersede their original documents sent in first RFI and the first application pack and that previous versions are no longer valid documents. We are aware that the previous documents (now superseded) may have been issued as part of an FOI. Any representation made using the information in these previous documents must not be considered, as the information has now been superseded.

Superseding Documents

- 001 V3 Non-technical summary
- 009 V3 VSL Lower Link farm EMS
- 007 V3 VSL Water map
- 008 V3 Inlets and outlets map

New documents

- 017 Maximum daily discharges - estimates using abstraction data for activities
- 018 Inlet, sampling and outlet photographs

Here follows a description of the responses to the RFI.

1. Updated NGRs for the outlet locations has been provided in document 009 V3 Lower Link Farm EMS. Updated supporting documentation that reflects the revised outlet locations where effluent is being directly discharged into inland freshwaters has been provided in documents 009 V3 Lower Link Farm EMS, 007 V3 VSL Water map, and 008 V3 Inlets and outlet maps. 001 V3 Non-technical summary has been updated accordingly.
2. Labelled photographs of each inlet and effluent monitoring point and each outlet location have been provided in the new document 018 Inlet, sampling and outlet photographs.



3. The Eastern Carrier is the upper section of the Eastern Channel and has been renamed in all the documents as the Eastern Channel.
4. NGRs for two representative sampling points for the factory wash water have been added to the descriptions in the 009 V3 Lower Link Farm EMS. The first sampling point is at the top of beds B11 and 12 which represents effluent prior to it discharging to groundwater via the sacrificial watercress beds B11/B12, and the second point is located at the bottom of B11 prior to discharge to the Eastern Channel.
5. An annotated schematic per activity showing the inlets, sampling points and outlets has been provided in document 007 V3 Water map, 008 V3 Inlets and outlets map, and 009 V3 Lower Link Farm EMS.
6. Abstracted water is used a proxy for discharged water. This is because of the infiltration of groundwater to the watercress beds adds to the water volume in the discharge to river, and this would not represent the water used for the activity.

Abstracted water has been measured using run time meters until mid-September 2023. Run time meters estimate the amount of water used based on the amount of water that is pumped from the borehole and assumes that the pumps are running at full capacity. This can result in an overestimate of abstracted water.

There were 5 NIVUS flow meters on boreholes across the site at the time that the run-time meters were operating. The full site was metered in mid-September 2023 with all farm borehole activity now measured using NIVUS meters. The NIVUS meters give accurate readings of what is actually being pumped from the borehole rather than using rather than an estimation.

The meters are NF600 clamp-on instruments. This model is not currently MCERT accredited but NIVUS is aiming to have the model certified by the end of 2024.

From January to May 2024 the site experienced heavy flooding across most of the watercress beds, with the heaviest flooding around R and D blocks. Due to this flooding and the artisanal flows the data for the NIVUS meters was affected, likely not giving an accurate picture of the actual water used. The majority of the borehole pumps across the site were switched off and so were not actively abstracting water during flood periods.

As a result, we have provided an estimated daily discharge volume using the run time meter data.

We are unable to provide accurate daily discharge volumes for each activity as the activities are interconnected. For example, Activity 1a & 1b share an inlet and a sampling point. The water can enter the river through either outlet 1a or 1b and this will depend on how the water is directed by the farm manager in relation to the operational needs. This applies to Activities 1a, 1b, 2a, 2b, 2c, 3a, 3b, and 3c. Therefore, we have divided the abstraction data by the number of activities that the inlet relates to.

In addition to the RFI points above, it is important to understand that the sampling points are located at discrete points to ensure a sample of watercress bed effluent is obtainable. However, the water system at Lower Link Farm is interconnected. Therefore, when beds are being cleaned the effluent



passing the sample point will be diverted to the farm settlement tank and not discharged at the permitted outlet. The farm settlement tank pipework is accessed by shutting off the water route to the river and opening the pipe to the settlement tank. At these times it will not be possible to take a sample due to the water being 'dirty' and not representative of water discharge to the receiving water. The farm settlement system pipework divert is explained in 009 V3 Lower Link Farm EMS, section 5.0.

We are satisfied that this addresses the RFI. If you have any questions, please do contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read "LMC".

Leah Mathias-Collins (Group Environment Manager, Vitacress Ltd).