



Karen Garner | Technical Support Unit Assistant, Planning Department, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37467 | External: +44 (0) 1903 737711 | E-mail: karen.garner@arun.gov.uk

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From: Claire Potts
Sent: 22 March 2017 13:48
To: Julia Mills
Cc: Planning.Responses
Subject: FW: AL/111/16-OUT SUPPLEMENTARY DRAINAGE STATEMENT

Please could the Supplementary Drainage Statement be uploaded to AL/11/16/OUT.

Thanks

Claire

Claire Potts BSc MSc MRTPI | Strategic Development Team Leader, Strategic Development, Arun District Council | First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37698 | External: +44 (0) 1903 737698 E-mail: claire.potts@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



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From: [REDACTED]
Sent: 28 February 2017 16:48
To: Claire Potts
Subject: AL/111/16-OUT SUPPLEMENTARY DRAINAGE STATEMENT

AL/111/16-OUT Land East of Orchard Gardens Supplementary Drainage Statement 25 February 2017

1. This is an outline application only for 57 units. The proposed 57 units in the indicative layout comprise 6no. 1bed 2person, 18no. 2bed 3 person, 27no. 3bed 4 person and 6no. 4bed 6 person properties. The development would produce less than 22 cubic metres a day. This is based on Southern Water 's consumption figures and their charging basis that 92.5% of water consumed is returned to the sewer (www.southernwater.co.uk/consumption-guide).
2. The application proposes a SUD scheme for surface water drainage to and a connection to the foul sewer network.

3. The site is immediately adjoining the village of Westergate and is within the **Barnham Eastergate Westergate** (BEW) housing allocation in the emerging local plan
4. The development is in the **Lidsey Wastewater Treatment Works** (Lidsey WTW) catchment area. A main foul sewer exists in the highway at the entrance to the site. The **Lidsey Surface Water Management Plan** (LidseySWMP) of October 2014 states the consented pass forward capacity at Lidsey WTW is 129 litres per second. The Lidsey SWMP was produced by Southern Water, West Sussex County Council, Arun District Council and the Environment Agency.
5. The volume of foul water likely to be produced by this development is less than 3 minutes of the Lidsey WTW daily processing capacity. If considering possible flooding then to put it into context this is less than 1.2mm spread over the site area or 1/500th of a mm rainfall spread over the Lidsey SWMP area.
6. Arun Local Plan 2003 Policy GEN9 states "Planning permission for development which will materially increase foul and/or surface water discharges will be refused unless the Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development. Consideration should also be given to the use of Sustainable Urban Drainage Systems (SUDS) as alternatives to conventional drainage where appropriate."
7. Southern Water's initial response to AL/111/16/OUT was that the application was premature due to lack of capacity at Lidsey WTW and that that was not going to become available until 2023 due to their funding programme. They have not used this approach on sites outside of the BEW area. If permission is granted they request a condition that the development not be occupied until adequate capacity is available through completion of improvement works to Lidsey WTW.
8. Southern Water's initial response also states "the development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area contrary to paragraph 109 of the NPPF." The relevant section of Paragraph 109 reads "preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability."
9. In their second response on AL/111/16/OUT Southern Water reiterate the point about prematurity due to capacity at Lidsey WTW. They also state that they have identified insufficient capacity in the network but acknowledge that network capacity can be dealt with by S98 of the Water Industry Act 1991. They also state that investigation is ongoing into dealing with infiltration of surface and groundwater into the network in the Lidsey catchment but they can give no dates for that.
10. Southern Water's responses do not acknowledge the possibilities referred to in their email to the BEW consortium of 23 February 2015. In that email Southern Water acknowledge the possibility of improvements to Lidsey being brought forward from their AMP 7 to AMP6 ie from 2020-25 to 2015-20.
11. In the Lidsey SWMP, Section 10, the potential for development of the BEW housing allocation is considered. In table 10.31 Options for growth one of the options is to "Conduct sewer rehabilitation on the existing Lidsey Wastewater network and make hydraulic upgrades to enable the additional foul flows from the development to be accommodated into the Lidsey WTW. It is understood there is some process headroom currently available at the WTWs." It goes on to say that "sewer rehabilitation will not provide adequate reduction to permit all foul flows from the development to enter the Lidsey WTW catchment. Further upgrades will be required." This demonstrates that sewer rehabilitation has the potential to free up some capacity at Lidsey WTW.
12. This infiltration reduction approach was reinforced very recently by Southern Water on 5 January 2017 when they responded to the 100 unit application Y/80/16/OUT at Yapton. This is outside the BEW allocation. They did not refer to that application as being premature. They say that "At present Lidsey catchment is under Hydraulic Issue, preventing the connection of any additional foul flow into the network. Development flow might be permitted into the Lidsey network if the developer can prove the removal of surface water flows into the system." The application was not

approved so this possibility remains open for other sites in the catchment. Especially for smaller sites such as AL/111/16/OUT.

13. The Environment Agency (EA) prefer developments to be connected to the main foul sewer system to avoid a proliferation of private treatment plants. If at the time a planning application is submitted all options to connect to the mains network have been explored and show that a connection is not possible then they would consider an application for an environmental permit for a private treatment works.
14. Application AL/111/16/OUT is an outline application and in accordance with EA preference proposed connection to the foul sewer network. If however all other possibilities are excluded a package treatment works could be provided. The site includes a drainage ditch along its East boundary. A package treatment plant could be provided in the North east corner of the site and discharge to the ditch. Design of such a treatment plant, and EA approval can properly be considered at reserved matters stage as has been done for other developments. It is acknowledged that the increased flow to the Lidsey Rife could theoretically increase flood risk and would have to be taken into account when calculations are done for the SUD scheme.
15. Given the overall size of the catchment and the volume of water involved this development will not result in any material increase in flooding risk upstream or downstream. This is especially the case when the proposed development is towards the southern end of the foul sewer line from Westergate to Lidsey and downstream of surface water flooding incidents in the villages.
16. In conclusion there are three ways in which the foul drainage can be dealt with before 2023 for this outline application for development:
 - a. Southern Water bring forward improvements to Lidsey from AMP6 to AMP7 to increase capacity.
 - b. Southern Water, with or without developer involvement, could reduce infiltration and free up capacity at Lidsey.
 - c. An on-site package treatment plant could be provided.
17. The requirements for Policy GEN 7 and NPPF para 109 can therefore be adequately dealt with by way of a 'Grampian' condition along the lines suggested by Southern Water in the latter part of their initial response, ie "Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to and approved in writing by, the Local Planning Authority in consultation with Southern Water."

TCPlanning 25 February 2017