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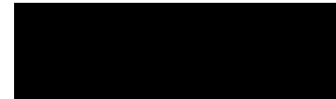
**Southern
Water**

Planning and Development Services
Arun District Council
Arun Civic Centre
Maltravers Road
Little Hampton
West Sussex
BN17 5LF

Your ref
F/4/20/OUT

Our ref
DSA000038514

Date
05/11/2024



Dear Sir/Madam,

Proposal: Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding. This application affects a Public Right of Way. This application is the subject of an Environmental Statement. This application falls within CIL Zone 1 - Zero Rated.

Site: F/4/20/OUT: - Land at Ford Airfield Ford, West Sussex BN18 0HY.

We write further to our letter dated 24/11/2021 and in response to the issuing of planning condition 35 for application F/4/20/OUT.

Southern Water maintains its objection regarding this development, and we retain our view that the current plan is unsuitable for the intended purpose.

This objection is based on the following:

- The Masterplan is developed based upon the location of the 3 ouE/m³ as the 98th percentile of hourly averages contour. As a sludge processing site, we highly recommend the use of the Environment Agency H4 odour guideline of 1.5 ouE/m³ as the 98th percentile of hourly averages contour.
- The 'sniff tests' conducted by both Hoare Lea (representing the developer at that time), and Phlorum (representing the Local Authority), both observed strong and significant odours in positions outside the modelled area of odour constraint. This shows that the model is likely to be understating the potential area of future odour effects.

Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX
southernwater.co.uk

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Subsequent to the initial consultation we received in 2021, we draw your attention to the following information:

Southern Water was only given a red line outline boundary plan to provide comment upon in the 2021 consultation. The suitability of subsequent placement of land uses within the proposed area of odour constraint have not been assessed.

- These land uses (school playing fields and employment land) are defined as having a medium sensitivity to odour.
- They are located within the both the predicted odour contour and suggested 300m buffer zone.
- No assessment of the potential for odour effects and suitability of the land use at these locations has been conducted to date to our knowledge.

Condition 35 of the application, requesting a 300m buffer from the ASP, seems to be a misinterpretation of the advice provided by the Council's odour advisors.

The 300m buffer should be the area drawn from the ASP, Main OCU and Sludge OCU rather than just the ASP. The OCUs were identified as the 'most odorous part of the WwTW' and emissions from these areas, observed to be 'moderate' and significant, were detected at distances up to 300m in odour surveys.

Information Request

Please can we receive a response advising as to why the buffer distances were applied only from the ASP and not the other 'main odour' sources identified by the assessment. Emissions from these sources were detected in excess of 300m from the source, noting the following quotes from the November 2021 Phlorum odour assessment review:

- "2.30 During walkover/sniff test 1, strong odours could be detected transiently but regularly up to 120m from the WwTW boundary, and at least 300m from the most odorous part of the WwTW, i.e., the main works odour control unit. The three locations where strong odours could be detected were not the three closest, as is suggested in the report, suggesting that a plume from the OCU might be grounding there".
- "2.4. Such discrepancy between modelled and observed results should point to the adoption of the precautionary principle. If unacceptable odour contours are predicted to occur 300m from sludge processes, then this ought to be considered the radius in all wind directions where such odours could affect the application site. This would be a more robust way to inform the appropriate layout of the masterplan."

We would be grateful for any information that you can provide in relation to the above.

Summary

As of 31 October 2024, Southern Water maintains the objection to the development, a position which has not changed during this application process.

Please note, it is the role of the local authority to determine whether the identified level of risk is likely to be a material planning concern for any development. Should the application be approved without

our requested conditions, then the local authority has adopted a less cautious approach to odour risk than recommended by Southern Water.

As such, should there be complaints at this location following occupation, and Southern Water can demonstrate that Best Practicable Means (BPM) are applied, there is no further obligation for Southern Water to resolve the matter. Southern Water has stated an objection and will refer to this response should complaints occur after occupation of the new development.

We hope to work closely with you in ensuring that any new residents are not impacted by odours emanating from the operation of our Ford Wastewater Treatment Works and that our guidance is applied in line with best practice.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX [REDACTED]

Website: southernwater.co.uk or by email at: [REDACTED]

Yours faithfully,

Future Growth Planning Team

Developer Services

southernwater.co.uk/developing-building/planning-your-development

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF

www.arun.gov.uk

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From: SouthernWater PlanningConsultations

Sent: 05 November 2024 11:27

To: Planning <Planning@arun.gov.uk>

Subject: FW: DSA000038514 F/4/20/OUT

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Good morning,

Please find attached our response letter for F/4/20/OUT.

Yours sincerely
George Edwards

Developer Services



southernwater.co.uk



from
Southern Water

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