



from
**Southern
Water**

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

Your ref
F/4/20/OUT

Our ref
PLAN-032051

Date
30/03/2020



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.

Thank you for your letter dated 28/02/2020. Southern Water has assessed the predicted impact of this proposal on its existing infrastructure and comments as follows.

Having reviewed the documentation submitted in support of this application, including Appendix 11.1 Odour Assessment Technical Report, it should be noted that paragraph 1 of section 2.4 of the report is inaccurate; Southern Water's guidelines relating to development near to WTWs is available on our website; <https://www.southernwater.co.uk/media/3018/ds-planning-comments.pdf>. This document states that we will object to any proposed development within the 1.5 OdU contour of an existing WTW. Comparison of Figures 11.3 and 11.4 of the report with the Illustrative Masterplan of the site show that some residential development is currently proposed within the 1.5 OdU contour.

Moreover, it should be noted that the outcome of this report has not yet been agreed with Southern Water and some potentially significant key omissions have been identified that will require discussion. Further investigation is required as a result, and revisions to the development layout may be required pending the outcome of these investigations.

We therefore recommend that final development layout be subject to further investigation into odour emissions from Ford WTW, as well as other waste processing facilities within the vicinity, that will need to be agreed with all stakeholders prior to commencement.

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

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Our assessment has also revealed existing infrastructure traversing the development site. Please find attached a plan of the sewer records showing the approximate position of a public foul rising mains crossing the site. The exact position of the public rising mains must be determined on site by the applicant before the layout of the proposed development is finalised.

Please note:

- The 600mm diameter foul rising main requires a clearance of 3.5 metres, 100mm and 125mm diameter foul rising mains requires a clearance of 3 metres on either side of the public rising mains to protect it from construction works and to allow for future access for maintenance.
- The 125mm and 100mm diameter foul rising mains requires a clearance of 3 metres on either side of the public rising mains to protect it from construction works and to allow for future access for maintenance.
- No development or tree planting should be carried out within 3.5 and 3 metres of the external edge of the public foul rising mains without consent from Southern Water.
- No soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of a public foul rising main.
- All existing infrastructure should be protected during the course of construction works.

Furthermore, it is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

In order to protect drainage apparatus, Southern Water requests that if consent is granted, a condition is attached to the planning permission. For example, "The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to protect the public sewers, prior to the commencement of the development."

Should planning approval be granted then Southern Water recognises its obligations under the new charging regime to provide capacity in the existing sewerage system to accommodate the needs of the proposed development. Any such network reinforcement will be part funded through the New Infrastructure Charge with the remainder funded through Southern Water's Capital Works programme.

Southern Water and the Developer will need to work together in order to review if the delivery of our network reinforcement aligns with the proposed occupation of the development, as it will take time to design and deliver any such reinforcement.

It may be possible for some initial dwellings to connect, pending network reinforcement. Southern Water will review and advise on this following consideration of the development program and the extent of network reinforcement required.

Southern Water will carry out detailed network modelling as part of this review which may require existing flows to be monitored. This will enable us to establish the extent of works required (If any) and to design such works in the most economic manner to satisfy the needs of existing and future customers.

Our assessment of the timescales needed to deliver network reinforcement will consider an allowance for the following:

- Initial feasibility, detail modelling and preliminary estimates.
- Flow monitoring (If required)
- Detail design, including land negotiations.
- Construction.

The overall time required depends on the complexity of any scheme needed to provide network reinforcement. Southern Water will seek however to limit the timescales to a maximum of 24 months from a firm commitment by the developer to commence construction on site and provided that outline planning approval has been granted.

The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS).

Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long term maintenance of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system. Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

Land uses such as general hardstanding that may be subject to oil/petrol spillages should be drained by means of oil trap gullies or petrol/oil interceptors.

We request that should this application receive planning approval, the following condition is attached to the consent: "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."

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance

with Sewers for Adoption standards will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

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

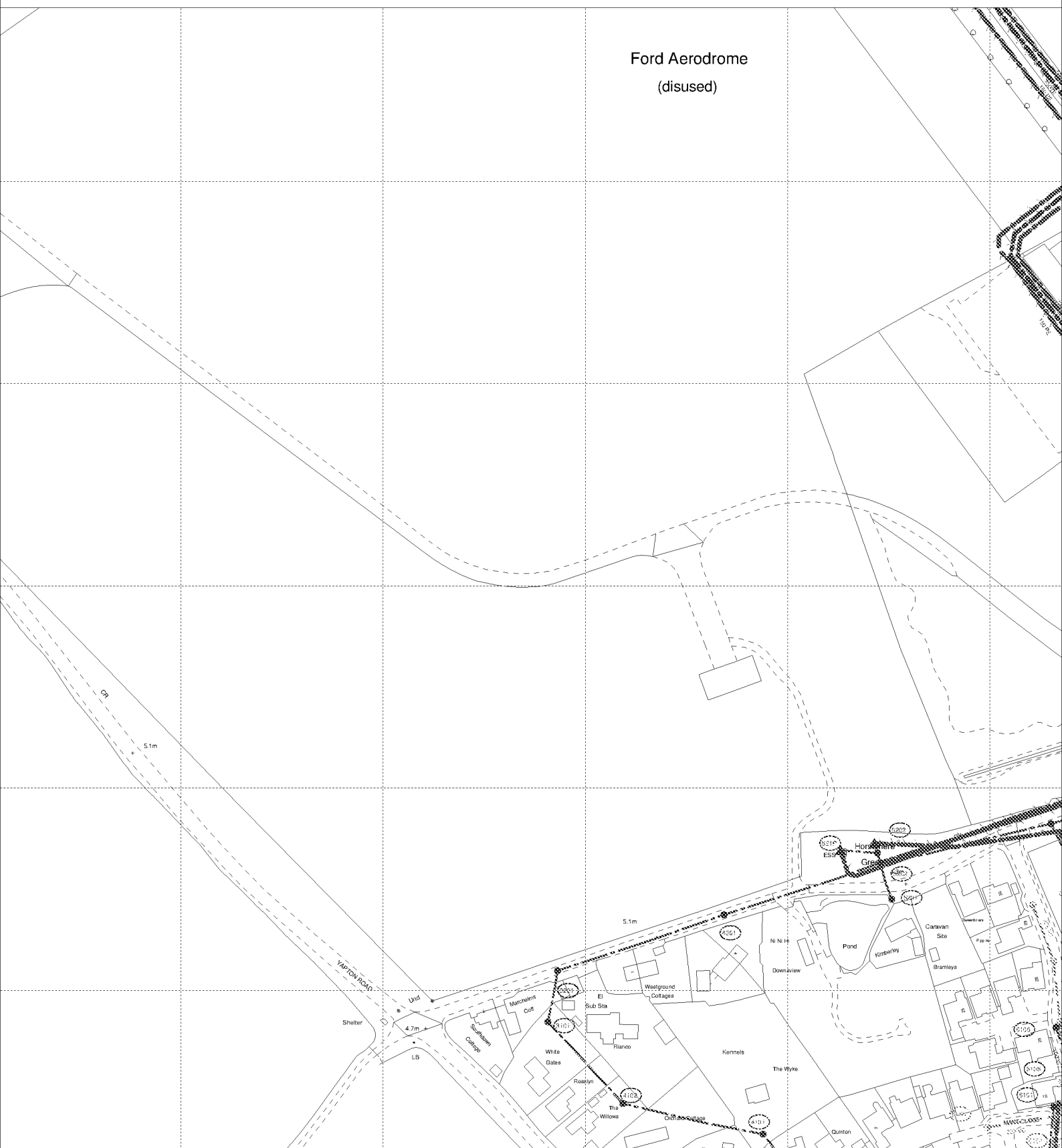
[REDACTED]

Yours faithfully,

[REDACTED]

Joff Edevane
Growth Planning Lead
Business Channels

SOUTHERN WATER



The positions of pipes shown on this plan are believed to be correct, but Southern Water Services Ltd accept no responsibility in the event of inaccuracy. The actual positions should be determined on site.

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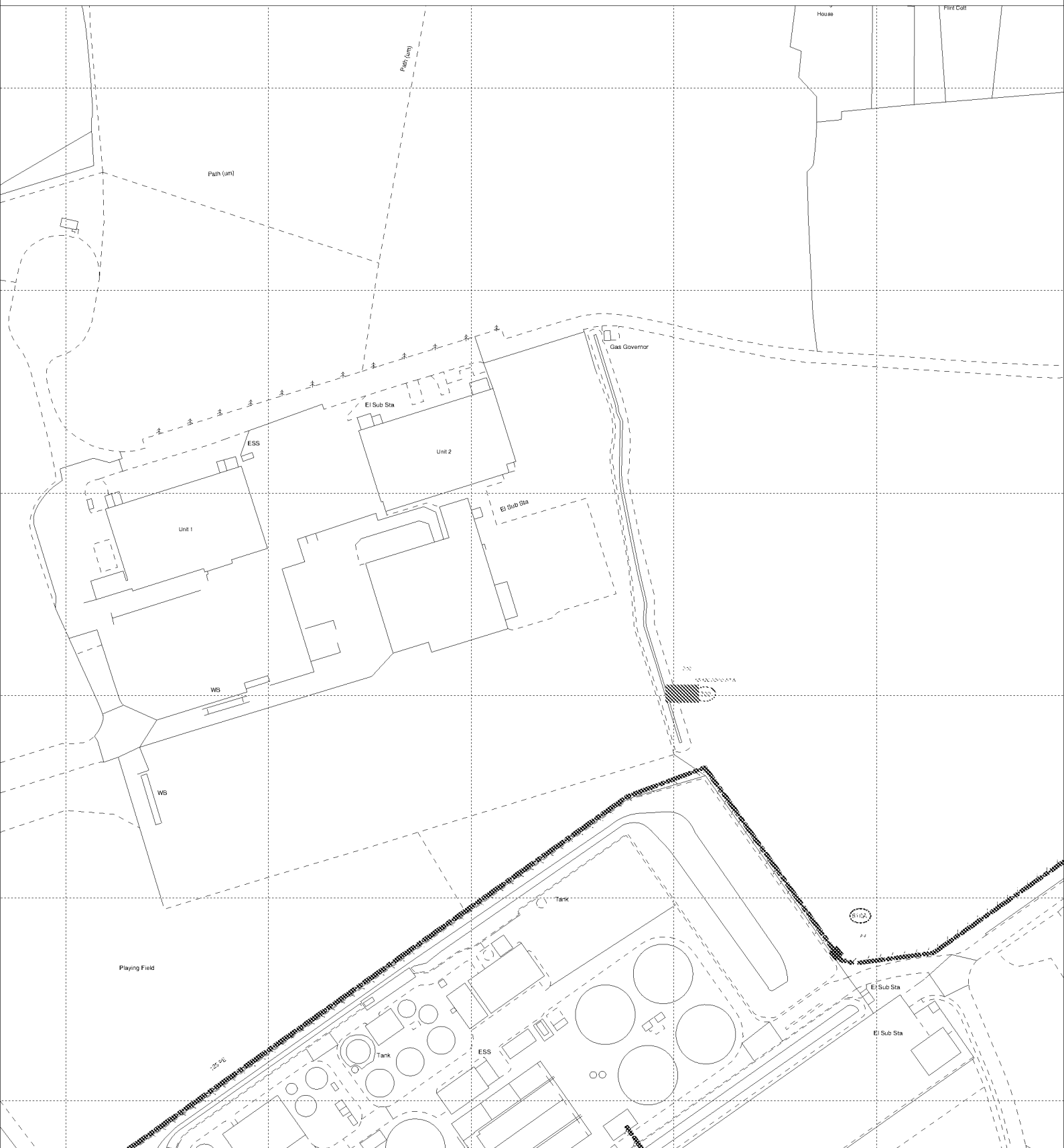
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