



Southern Water's response to Arun District Council's consultation on further information in relation to the Environmental Statement on application F/4/20/OUT

Southern Water owns and operates Ford Wastewater Treatment Works (WTW), adjacent to the proposed development area. With reference to paragraph 2.16 of the Environmental Statement Addendum, which states that no response has been received from Southern Water, we confirm that on 27 November 2020 we sent a further response to Hoare Lea's letter dated 5 November 2020. A confirmation of receipt from Hoare Lea on 2 December stated the following:

"We will review the document and discuss with our project team and will be in touch in due course regarding how we propose to progress."

No further responses have been received and to our knowledge, no revisions have been made to the odour assessment submitted as part of the planning application submission. As such, we regard issues raised in previous reviews as remaining largely unresolved and potentially significant.

Summary of Concerns

The submitted masterplan uses the odour contours, as presented in the February 2020 odour assessment, to define areas suitable for development. The transposition of data from the odour report to inform that masterplan is acceptable, i.e. the use of Southern Water's suggested odour criterion.

Atkins' review, however identified several points of contention or clarification and the odour assessment deviates from what Southern Water would consider an appropriate assessment. A robust and conservative assessment is considered essential on the basis that on-site odour emissions were estimated and not measured.

Southern Water is yet to receive a response on how these aspects are intended to be addressed.

Although not exhaustive, the following aspects are potentially major concerns and are, as of the close of the consultation period, unresolved.

1. Source Emissions – Odour Control Units (OCU)

The assessment understates odour emissions. Modelled emissions were between 10-25% of typical emission concentrations from single stage OCU units.

2. Source Emissions – Area Sources

The assessment understates odour emissions. Modelled emissions from the largest odour emitting area source, the Activated Sludge Plant (ASP), are not considered to be conservative. The selected emission rates are classified as 'Low' when compared to the commonly adopted UKWIR wastewater odour emission rates. Actual emissions may reasonably be twice the modelled value in line with 'typical' emissions defined by the UKWIR research.

3. Source Emission Sizes

The dimensions of the modelled emission sources are approximately 10% smaller than actually on the site.

4. Meteorological Data choice

Results of a meteorological sensitivity study has been requested to ensure that the chosen meteorological data is appropriate.

5. Cumulative impacts

The cumulative impact of odour from the WTW and surrounding industrial uses has been discounted within the Environmental Statement Addendum. We feel it is optimistic to assume that any environmentally permitted facility will be completely odour free and would encourage the Council to take a pragmatic view regarding the potential for cumulative impacts.

6. Future WTW expansion

Arun Local Plan (2011-2031) Policy H SP2c site allocation SD8 at Ford states that development proposals must demonstrate compliance with requirement (j), to *'...not prejudice the operation of or the expansion of the treatment plant as required to accommodate future growth in the District.'*

We have found no evidence that any consideration or allowance has been given to the potential future operation of the works.

As a result of housing growth allocated in the Arun Local Plan, Ford WTW will receive a higher loading of wastewater flows which may generate additional odour emissions from the site. In an email to the Council from the Environmental Health Officer dated 28 August 2020 it was stated that *'any further developments at the existing WWTW could not occur if this means there is an increase to the odour loading. This approach will mean there are significant planning policy decisions and a strategic overview that needs to be considered. Allowing the houses as part of this development so close will curtail and restrict any expansion of the WWTW'* Southern Water shares this concern and is therefore keen to ensure that current proposals are required to address the above mentioned policy criterion of the Arun Local Plan.

The need to consider such matters is also a requirement of the NPPF paragraph 18 which states that *'existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established'*.

Each of the above-listed items is likely to result in either an increase in the size or shape of the odour contours used to inform the proposed development masterplan layout. As such, the proposed masterplan in its current form may result in placing sensitive receptors in an area where odour impact and complaints may be expected to occur.

As the results are marginal, we recommend that a site survey and revised odour assessment are conducted prior to the approval of the outline planning application, using the more conservative assessment parameters recommended by Southern Water. This will help to ensure a sound and sensible approach is taken to safeguarding Ford WTW's ability to continue to accommodate future growth in Arun district.