



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-037823

Date
25/03/2021



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 may affect the setting of a Listed Building. This application falls within CIL Zone 1 - Zero Rated.

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

Thank you for your letter dated 22/02/2021.

If the applicant proposes to offer a new on-site drainage and pumping station for adoption as part of the surface water public sewerage system, this will have to be designed and constructed to the specification of Southern Water Services Ltd. A secure compound would be required, to which access for large vehicles would need to be possible at all times. The compound will be required to be 100 square metres in area, or of some such approved lesser area as would provide an operationally satisfactory layout. In order to protect the amenity of prospective residents, no habitable rooms shall be located within 15 metres to the boundary of the proposed adoptable pumping station, due to the potential odour, vibration and noise generated by all types of pumping stations. The transfer of land ownership will be required at a later stage for adoption.

No discharge of foul sewerage from the site shall be discharged into the public system until offsite drainage works to provide sufficient capacity within foul network to cope with additional sewerage flows are complete. Southern Water is currently in process of designing and planning delivery of offsite sewerage network reinforcements. As previously advised Southern Water seeks to limit the timescales to a maximum of 24 months from a firm commitment of the development.

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

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Should the applicant wish to offer the sewers for adoption under section 104 of the Water Industry Act, the drainage design should comply with the Sewerage Sector Guidance (water.org.uk/sewerage-sector-guidance-approved-documents/) standards and Southern Water's requirements. Please note that non-compliance with the Sewerage Sector Guidance 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.

Waste Infrastructure Statement (WIS)

We would draw your attention to the following paragraphs in the WIS:

Paragraph 2.7 cites Policy H SP2c (SD8) criterion j of the Arun Local Plan (2011-2031) that the Ford allocation should *'take into account the siting of Ford Wastewater Treatment Works, including the outcomes of an odour assessment, and not prejudice the operation of or the expansion of the treatment plant as required to accommodate future growth in the District'* (our emphasis).

In paragraph 2.14 the applicant has strongly emphasised the content of an email from Karl Roberts which states that *'it is only necessary for the proposed development to consider the relationship with existing or consented (and extant) schemes.'*

2.15 The applicant has stated that as a result of the above-mentioned email, 'it is not necessary, reasonable or appropriate for proposals to consider potential unconsented operations.'

Southern Water wish to point out that Policy H SP2 of the Arun District Local Plan has been tested through examination, and therefore the requirement for development not to prejudice the operation or expansion of Ford Wastewater Treatment Works (WTW) as required to accommodate future growth in the district, should carry far greater weight in this instance.

Southern Water can find no evidence in the Waste Infrastructure Statement (or the Odour Assessment) to suggest that the requirement not to prejudice the future expansion of Ford WTW has been considered or accommodated in the applicant's proposals.

We would also point out, with reference to paragraph 3.64, that Southern Water did in fact provide extensive comments on both the Pre-Submission and Submission versions of the Ford Neighbourhood Plan on 9 September 2016 and 1 August 2017 respectively. We have email 'sent' records to prove this, as well as an auto acknowledgement of receipt dated 1 August 2017. We are therefore dismayed to see that the applicant cannot find any reference to these comments, as we were extremely dismayed at the time to see that none of our comments had been taken into account between the Pre Submission and Submission versions of the Plan.

Therefore, whilst the applicant has stated in paragraph 3.63 of the WIS that 'it is not envisaged that future residents or occupiers would be adversely affected by the current operations at the safeguarded site' (our emphasis), this does not demonstrate that there has been any consideration given to the impact of any future expansion of Ford WTW as required by criterion j of Policy H SP2c (SD8) of the Arun District Local Plan.

All other comments in our response dated 30/03/2020 remain unchanged and valid.

For Southern Water Planning Webpage please click the below link:

southernwater.co.uk/regulations-services/planning-your-development

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,

[REDACTED]

Joff Edevane
Growth Planning Lead
Business Channels

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SOUTHERN WATER



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O.S. REF: SU9902SW

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Screen Print

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WARNING: Unknown (UNK) materials may include Routed Asbestos Cement



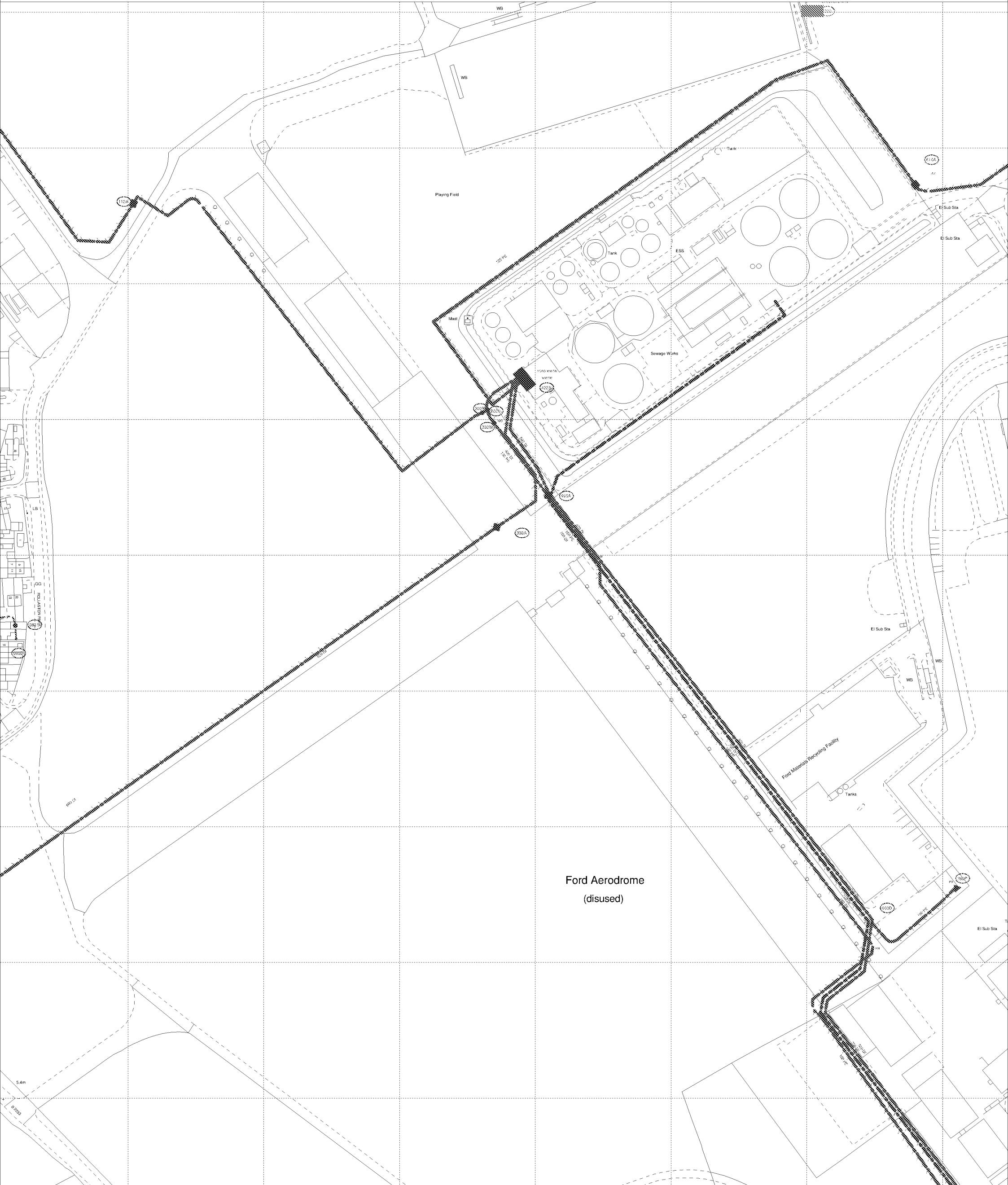
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SOUTHERN WATER



Ford Aerodrome
(disused)

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