The Parish Clerk
Bramber Parish Council

By Email Only

Your Ref:

Our Ref:

Date:
29 June 2020

Contact:
Tel: 01273 663742

Dear Sir/Madam,

Hunston Pre Submission Neighbourhood Plan

Thank you for consulting Southern Water on the Pre-Submission version of the Hunston Neighbourhood Plan.

Southern Water is the statutory wastewater undertaker for the area covered by Hunston Parish Council. As such, please find attached our comments in respect of the Neighbourhood Plan.

We hope that you find our response useful and look forward to being kept informed of progress.

Yours faithfully,

C Mayall

Charlotte Mayall
Regional Planning Lead
Hampshire & West Sussex

Southern Water Services Ltd Registered Office: Southern Water, Southern House, Yeoman Road, Worthing, BN13 3NX. Registered in England No. 2366670

Paragraph 3.4.18: Flood Risk and Drainage

We take this opportunity to comment on paragraph 3.4.18 as it relates to the operation of Southern Water's wastewater assets.

Southern Water operates Summer Lane Pagham Wastewater Treatment Works (WTW), under permits issued and regulated by the Environment Agency (EA). These quality standards are set out in a number of European directives that are in place to protect coastal, estuarine and river water environments.

During periods of heavy rainfall when a significant amount of rainwater enters the sewers causing a spike in flows entering the WTW, excess flows are diverted to storm settlement tanks. These tanks hold the stormwater (a mixture of rainwater and wastewater) to enable it to settle out, with denser material sinking to the bottom. If rainfall is prolonged and tank capacity is exceeded, excess stormwater will weir out of the top through mesh screens to further ensure larger particles are not released to the environment. When incoming flows eventually subside to an appropriate level, the contents of the storm tanks are returned to the WTW for full treatment.

These controlled releases of stormwater into the watercourse are occasionally necessary to prevent wastewater backing up in the network, potentially flooding homes, businesses and the environment. Such releases are permitted under the terms of our licence from the EA.

With regard to housing growth across the Summer Lane Pagham WTW catchment, Southern Water has a statutory obligation to serve new development and can fund, plan and deliver additional capacity at the WTW to meet demand from new development through the water industry's price review process. This review is carried out every five years by Ofwat, the water industry's economic regulator.

If the future release of treated wastewater at a WTW is anticipated to exceed the maximum allowed by its environmental permit (as a result of new development), Southern Water would apply to the EA for a new or amended permit. An increase in volumetric headroom may be permitted, provided that it is technically possible to do so whilst also meeting any requisite water quality objectives, as determined by the relevant authorities at the time such an application was made. As such, any existing issues would not be a constraint to future growth, even if investment requirements are significant. Southern Water has a statutory obligation to find solutions and provide infrastructure to serve new development.

Proposed amendment

In order to accurately reflect the above, we propose the following amendments to the wording of paragraph 3.4.18 of Hunston Neighbourhood Plan (additional text underlined):

In February 2017 it was reported that stormwater, which is a mix of rainwater and screened wastewater, ~~raw sewage~~ is being discharged every five weeks on average. High flows caused by heavy rainfall are diverted into storm settlement tanks to prevent overloading of ~~Untreated sewage from~~ the Treatment Works in Summer Lane. If the capacity of these tanks is subsequently exceeded as a result of prolonged heavy rainfall, the excess stormwater weirs off the top through mesh screens before it is discharged into the Pagham Rife from where it flows into the Harbour. Pagham Parish Council member Cllr Phil Hailey reported that "Since 2011, Southern Water have had to inform the Environment Agency 55 times of a discharge into Pagham Rife of untreated or partially treated sewage. Southern Water have said they have no issues with the proposed houses here because they would not cause the treatment works any problems but, clearly, there are big problems already."

Policy EH3: Flooding, drainage and new development, and
Policy H1: Housing Sites Allocation

Southern Water has undertaken a preliminary assessment of the existing capacity of local sewerage infrastructure and its ability to meet the forecast demand for the proposal for 200 homes set out in Policy H1. Our assessment reveals that the local network requires reinforcement in order to accommodate additional development. This is not a constraint to development however, provided planning policy for this site ensures that occupation of proposed development does not take place ahead of the delivery of sewerage network reinforcement.

If development is permitted to proceed where there is inadequate capacity in the sewerage network, Southern Water has limited powers to prevent connection and the system could become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 170(e) of the National Planning Policy Framework (NPPF) 2019, which requires the planning system to prevent both new and existing development from contributing to pollution.

Proposed amendment

Southern Water therefore supports the policy provisions of EH3 requiring drainage conditions. To further support this and for clarity in relation to this specific development site, we would recommend this requirement be reinforced within Policy H1 as follows (new text underlined):

The following specifics must be addressed as part of any planning proposal:

[…]

12. no building shall be occupied until the sewerage network reinforcement scheme has been implemented in accordance with the approved details.