

**QUESTIONS POSED TO SOUTHERN WATER BY THE  
OVERVIEW & SCRUTINY COMMITTEE AND THEIR RESPONSE**

- 1) What does Southern Water see as its role in the Planning Process, both in terms of planning policy (local plan) and Development Management? What is your role and contribution to the Water Quality Group and work undertaken as part of that group?**

In respect of our role in planning policy, Southern Water is a specific consultation body in relation to Local Plans and Neighbourhood Plans. We therefore expect to be consulted on those Plans.

We will assess proposals set out in Local and Neighbourhood Plans and raise any concerns we may have with the development proposed. We have a statutory obligation to serve new development and therefore we are unlikely to object to individual proposals. We seek to ensure that planning policies support delivery of necessary infrastructure in parallel with the development.

Southern Water can propose planning policies to facilitate this approach but each planning authority is at liberty to decide whether or not to take our proposals on board.

With regards to development management, Southern Water is not a statutory consultee on planning applications. However, we encourage planning authorities to consult us on major applications and will respond when consulted.

We assess the proposal set out in a planning application when consulted, for example the likely impact on the local sewerage network. If this assessment indicates that the risk of flooding from the public sewerage system would increase to unacceptable level as a result of the development, we would request a planning condition to mitigate this impact prior to occupation. This would typically involve connecting to the sewerage network at the nearest point at which capacity is available.

Southern Water does not have powers to impose or enforce a planning condition. This power lies with the planning authority.

Southern Water is a member of the Water Quality Group. This Group has considered the impact on water quality of the development proposed in Chichester's adopted Local Plan, focussing in particular on Chichester Harbour (a designated habitat).

The Group acted as the steering group for a study commissioned for the Local Plan by Chichester District Council to identify the options for delivering wastewater treatment capacity to serve proposed development. Southern Water contributed to this study and took forward the option of transferring wastewater flows to Tangmere

wastewater treatment works (WTW) to unlock strategic development sites in and around Chichester.

Since the adoption of the Local Plan Southern Water has continued to attend the Group to provide updates on the progress of investment schemes as well as investigations and mitigation measures to reduce infiltration of groundwater into the sewerage network serving the Chichester catchment.

**2) How does Southern Water approach preparing its consultation response to planning applications? What:**

- i) Do you take in to account?**
- ii) Survey information do you hold across the plan area and how is this referenced?**
- iii) Is involved in a capacity check?**

The responses below, follow the numbering above.

- i) When considering a planning application we take into account the following;
  - The nature of the development (residential or commercial)
  - Location of the development, is it in an area where the systems (sewers, water mains) are already constrained?
  - Depth of the existing sewers in relation to the development
  - Existing capacity of the network (water and sewerage)
  - Existing capacity of the wastewater treatment works
  - Proximity of the development to Southern Water assets
  - Means of managing the surface water arising from the development
- ii) There are a number of sources of survey information; examples of such data are;
  - Our GIS database which holds information on sewer location, size, depth etc
  - Drainage area plans (DAP) for catchments, these represent the operation of the sewerage system, and are used to model the impact of additional flows or the consequences of rainfall events
  - Internal databases holding the results of site specific investigations
- iii) Our initial capacity check undertaken to respond to the planning application is based on a desk top study, which incorporates available information and modelling runs.

On progression of a connection to the sewerage system on behalf of a developer, a more comprehensive assessment is undertaken, this may include flow monitoring in the sewer, a process that runs for several months. The data gathered enables models to be verified and hence provide confidence in the proposed solution.

- 3) Do you take 'infiltration' into account and make allowances for periods of heavy rainfall? It would be helpful to know how this is accounted for in capacity checks. We are aware that you have commissioned a study of infiltration from Alfold to Loxwood pumping stations, you may be able to update us on progress, but can you comment in more general terms as to how you determine when to commission a new study on infiltration.**

Infiltration is typically assessed on a catchment specific basis. The modelling of the impact of additional flow arising from development recognises the catchment specific level of infiltration. Monitoring the flows arriving at treatment works, or on occasions, individual pumping stations, acts as a trigger for an infiltration review.

- 4) It is not unusual for there to be limited information submitted on foul drainage with planning applications for new housing development – in what circumstances would you expect further information as to the potential solutions to be made available prior to the determination of a planning application?**

The level of information available at the planning application stage associated with foul drainage is the responsibility of the developer. When approaching ourselves they have a number of options available, from a simple is/isn't their capacity to accommodate the additional flow, through to a fully designed and costed solution that will accommodate the additional flows without creating a problem or worsening an existing issue. The latter activity can take many months to complete and as such lies outside the typical periods to determine planning applications.

- 5) Do you review and react to public comments made on a planning application in relation to foul water conveyance?**

We are aware of the operation of the sewerage system from our internal data sources such as blockage occurrence and cause, flooding location and frequency. We would encourage our customers to report any events associated with the sewerage system at the time of occurrence, rather than utilise the planning process to make such information known.

- 6) To what degree does Southern Water expect an applicant to resolve existing foul drainage problems where new development is proposed?**

It is the responsibility of Southern Water to address existing foul drainage problems. We do not expect applicants (developers) to fund the necessary infrastructure improvements. However, were the connection of a new development to cause a drainage problem, or exacerbate an existing problem, then we would look to alleviate or prevent this by seeking a connection at a point of capacity or increasing the capacity of the sewerage system. We would expect the developer to fund the element that prevented a deterioration from the current position.

**7) Within the Chichester Local Plan area we deal with a high number of small scale housing developments. Can you explain how you deal with the cumulative impact of new housing development?**

The cumulative impact of development is assessed when Drainage Area Plans are produced for sewerage catchments. As an example of the likely flows from new development, the peak flow from a ten property development would be in the order of one third of a litre per second. In isolation this would have no discernible impact on the performance of a sewerage system. Our assessment would recognise the proximity of the development to a known flooding location

From a wastewater treatment perspective, the accumulative impact of small scale development will be taken into account by the overall growth forecast for the catchment. The forecast is informed by official statistics from the Department for Communities and Local Government and the Office of National Statistics as well as the overall level of development set out in the Local Plan.

**8) How do you go about assessing the foul drainage implications of non-residential uses such as employment, hotels and caravan parks, in particular the capacity in times of peak demand such as July and August and other Bank holiday weekends?**

For non-residential areas such as caravan sites, we utilise standard values for foul wastewater discharges, which are typically less than those for residential properties. These values recognise both the transient nature of the occupiers and the reduced water consumption. Some of these sites will be served by a pumping station, in these cases we will use the capacity of the pumps in our assessment.

For establishments such as hotels, we prepare an estimate of the non-resident population based on the number of bedspaces in the catchment. Bedspace data is purchased from Tourism South East. We also monitor performance at wastewater treatment works on a regular basis. We will respond to variations in flow over time should this be required to remain compliant with our environmental permit.

With regard to employment this only has an impact at catchment level if net commuting into the catchment is significant. It does not matter whether a person is at home or at work - the flow and load is similar. Equally if a similar number of people commute in as out, the balance remains comparable. In our experience the effects of employment sites are rarely significant at WTWs. Wastewater arising from commercial activities (e.g. chemical processing) would be classed as trade effluent. Traders would need a permit from Southern Water prior to discharge of effluent into our network, and we would only allow this if capacity was available or could be provided.

**9) Can you explain the 'requisition' process for new drainage works and how that process is affected by the imposition of conditions on a planning permission;**

**there was an instance a couple of years ago where a condition imposed on a housing scheme to restrict flows appears to have been set aside and a gravity system agreed.**

A developer can requisition the provision of drainage to serve their site. This requires them to fund the construction of the necessary sewers to connect the development to the public sewerage system, typically at a point of capacity. The application of conditions associated with planning permission assists in preventing connections from new development causing issues associated with overloading of the sewerage system.

- 10) Does Southern Water review and monitor wastewater conveyance solutions (such as upsizing pipes and upgrading pumping stations) after they have been implemented to see if they are satisfactory?**

Monitoring of the operation of the sewerage system, in particular failure events allows us to verify the adequacy of investment solutions on the network.

- 11) One of the long term issues is the effect of non-degradable solids entering the sewerage system and causing blockages. The reason appears to be inadequate, or inadequately maintained, filters. What is your view on this?**

The sewerage system varies in size dependant on the flows it is expected to deal with. Drains leading from houses are typically 100mm in diameter and increase to 150mm in the highway. Sewers of this size are prone to blockages if non-flushable, non-biodegradable items such as fabric wipes are flushed down the toilet. Similarly fats oils and greases (FOG) poured down the drain can cause blockages, as the material solidifies in the sewer.

There are no filters to prevent the entry of such material into the sewerage system.

We experience in excess of 30,000 blockages each year and 80% of these are caused by the FOG and fabric wipes. To reduce and prevent such blockages we have a dedicated team who engage with the local community to provide guidance on the correct disposal route for these materials. The team focuses on 'hotspots' where we experience a high number of blockages.

As an indication of the magnitude of non-flushable items entering the sewerage system, last year we removed 3,245 tonnes of these materials that arrived at our treatment works.

- 12) Could Southern Water advise on their programme and priorities for maintenance and upgrade of the foul sewer network and pumping stations across the Chichester Local Plan area? Does it prioritise areas of the network that are old or that have known issues?**

Our investment programme to maintain sewer networks and pumping stations is prioritised on a risk basis. Of highest priority for investment are those sites with a high likelihood of failure (assessed on current performance) where failure would lead to internal flooding or pollution of watercourse or bathing waters.

**13) We are aware that you are working on a Manhood Area Drainage Plan with the Lead Local Flood Authority (WSSC) and CDC. Can you outline current progress?**

Southern Water has completed an assessment of current and future needs in the Manhood Peninsular area from a sewerage perspective. An internal report has been produced documenting the results of this study. The next stage is to work with external stakeholders to produce from a combination of the Southern Water document and the West Sussex County Council Surface Water Management Plan - a Drainage Strategy Framework document.

**14) There is as you know limited capacity available at some treatments works such as Apuldram. How do you approach a proposal by a developer for further connections to those treatment works?**

Southern Water has statutory obligations to serve new development and cannot refuse new connections. We are therefore duty bound to engage with proposals put forward by developers and seek solutions that would mitigate any adverse impact and allow the development to progress.

Whilst we cannot refuse connections we will advise developers that the Chichester/Apuldram catchment suffers from groundwater infiltration. Until an acceptable resolution to this infiltration issue has been found the level of new development that can connect to the Chichester (Apuldram) catchment is limited.

The level of development that can connect has been estimated by the Water Quality Group. We anticipate that the Environment Agency would object to development on water quality grounds when and if this level of development is exceeded. We would further anticipate that Chichester District Council as the planning authority would refuse planning permission unless adverse impacts on water quality are mitigated to the satisfaction of the Environment Agency.

**15) How does Southern Water respond to consultations from parish councils preparing their neighbourhood plans and site allocations? Do you have any guidance document for such groups who may lack suitable expertise on the issues?**

Southern Water is a consultation body in relation to Neighbourhood Plans. We therefore expect to be consulted. We will review the proposals set out in a Neighbourhood Plan in a similar way to a Local Plan. We have responded in writing to 11 Neighbourhood Plans within Chichester District, and answered queries by email

and in person. Due to the number of Neighbourhood Plans in our area we sometimes need to prioritise our approach, responding first to Plans that set out most significant development. We have some standard advice on Neighbourhood Plans that we would be happy to share.

**16) Can you tell us about the resources you provide for planning and development management for Chichester? Are you satisfied that they are sufficient to provide an effective service? Do you focus your resources on those sites with a greater level of development or more known issues?**

The Regional Planning team within Southern Water considers the long term provision of wastewater treatment capacity by review of local plans, census data etc. In doing this we are able to identify when additional treatment capacity is required and plan for the investment through the regulatory business plan process. Members of this team generally interface with the strategic planning teams within the Local Authorities

Our Developer Services Team manages the interface with developers and planning officers. In addition to the direct team members they draw upon the services of framework contractors, for example, modelling the impact of the proposed development on the sewerage system.

Resources are applied as appropriate, and typically dictated by the potential impact of the development on the existing sewerage system.

**17) One of your officers has attended the Council's Planning Committee on a couple of occasions and you may be aware that the Planning Committee often expresses concern about foul drainage in relation to new development proposals. Given that foul drainage is a technically complex subject, could such concerns be minimised by a more focussed approach at application stage, including more frequent senior representation by your staff?**

Suitably experienced representatives of our Developer Services planning team attend the Council's Planning Committee. These representatives' possess the knowledge and experience required to explain the reasons for a particular stance on a development proposal and to answer questions that members of the committee may have, such that informed decisions can be made. Senior management representation is available if the situation dictates.

We would welcome feedback on our approach and responses to applications; we have recently offered to meet with the Planning Services team to discuss our planning function generally.