

Designer's Response

Project	New Monks Farm, Lancing 385 Dwellings and Community Hub
Project Number	23621

Comments Received from Adur Floodwatch Group

Date Comments Received 23 November 2022

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1	<p><i>For the original hybrid application AWDM/0961/17 the management of foul waste for the overall scheme of 600 homes/IKEA/Travellers site/B&H Albion Training Academy was given an approval for a pumped solution into a new sewer line through Barfield Park to connect with the existing sewer line for North Lancing at the junction of Barfield Park and North Farm Road. From there flows all to go under the railway for onward pumping by the Old Salts Farm Pumping Station to the East Worthing waste treatment plant. It was understood that the capacity of the pumping station would be enhanced to accommodate increased flows. AFG has no evidence that this work has been carried out.</i></p>	<p>We are not sure why Adur Floodwatch group would expect to see any evidence of these works.</p> <p>The developer paid Southern Water to upgrade the Old Salts Farm Pump Station and Southern Water completed the upgrade works before the original application construction works commenced.</p>



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2 <i>Flows from the New Monks Farm site would be managed by telemetric sensors from an onsite pumping station to allow flows of up to 21 litres/sec only when the existing N Lancing sewer line had capacity. There was to be a containment tank to withhold flows on site when capacity was not available. AFG can find no evidence that this latter facility has so far been constructed when referencing the new detailed drawing for foul waste (see Appendix 3 Flood Risk Assessment Part 2 of 3).</i>	<p>As part of the S104 agreement between the developer of the original application and Southern Water for the adoption of the pumping station and initial foul water sewers on site a pump rate of 22.7l/s was agreed with Southern Water as the maximum discharge from the pumping station and that has been implemented under a S104 agreement with Southern Water. The storage, in the event of pump failure is built into the new foul network upstream of the pumping station and is not a single containment tank, this is normal practice and agreed with Southern Water as part of the S104 submission.</p> <p>These agreements are between the Developer and Southern Water and as such we are not surprised Adur Floodwatch Group have not seen them.</p>

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<p>3 <i>For the original hybrid application, AFG raised considerable concerns regarding the capacity of the N Lancing sewer to accommodate these increased flows. In extreme weather, this sewer surcharges with the ingress of rising groundwater with loss of foul waste amenity to residents in extreme weather conditions.</i></p>	<p>The issues with the sewers in Manor Way / Manor Close and groundwater ingress in that area to the public foul sewer are well known, it is for Southern Water to resolve issues with their sewer network. The development connects foul water approximately 900m south of Manor Close / Manor Way and to a location, a discharge rate agreed with Southern Water.</p> <p>The development is to be completed in phases and the site has already agreed a consent with Southern Water and discharge from the whole site via the new adoptable pumping station and initial foul sewer works. The new pumping station discharges to the existing Southern Water network at the south end of Barfield Park.</p> <p>The potential increase in flow from the additional 30 dwellings within the site foul network will be between 0.6 and 1.4 l/s, taking the whole site discharge to a maximum of 21.7l/s which remains below the rate of 22.7l/s, which is the rate of discharge agreed with Southern Water for the pumping station as part of the Section 104 Agreement for the site.</p> <p>The additional 30 dwellings will not affect the discharge from the pumping station as that is set at the rate agreed with Southern Water as part of the initial S104 agreement for the adoption of the pumping station and foul water system on site, this rate will not change as a result of this application.</p> <p>To clarify no sewerage from this site discharges to the Southern Water foul network in Manor Close or will have any impact on that foul water network which is approximately 900m north of the current site discharge point and suffers from well documented groundwater ingress to the foul water network in that location.</p>

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4 <i>So far, the first phase of buildout for Cala Homes, the Training Academy and the Travellers site have now been connected to the new sewer in Barfield Park with flows pumped from the onsite pumping station. For the last two winters we have not experienced excessive rainfall to cause the above inundation problem, whereas virtually every winter prior to that has seen surcharging sewers in Grinstead Lane and loss of foul waste for residents in adjoining roads. To manage the problem, SW has to implement over pumping into ditches or into other sections of sewer and/or employ use of tankering. This management has often to continue for months at a time to maintain sewer facilities for residents with considerable inconvenience to the community and managed traffic flows on the road network.</i>	<p>The proposed development does not connect to the foul sewers in Manor Close, Manor Way or Grinstead Lane where these foul sewer problems occur and it is for Southern Water to resolve issues with their network.</p> <p>In regard to rainfall we note that the Met Office published rainfall data for Winter 2019/2020 indicated the UK experienced 143% of the rainfall average from 1981-2010 and February 2020 was recorded as the wettest on record.</p> <p>The Met office published data also notes Winter 2020/21 had 122% of average rainfall compared to the 1981-2010 average.</p> <p>The statement that the last two winters have not experienced excessive rainfall is incorrect. Both winters have experienced greater than average rainfall when compared to the 1981-2010 winter averages.</p>
5 <i>With the changing weather patterns, residents are still concerned that the original scheme, as approved, will exacerbate these issues in extreme weather events when groundwater levels rise, as they do, when the aquifers in the Downs and the coastal area no longer have capacity to contain rainfall levels.</i>	<p>The surface water drainage system and storage were consented as part of the original application, provide suitable discharge and storage during all storm events up to and including the 100 year plus climate change event.</p> <p>The surface water improvements provided as part of the originally consented scheme have also provided a route and discharge for the upstream catchment through the new northern channel that provides surface water discharge at all tide stages and prevents tide locking as historically occurred.</p> <p>Southern Water, West Sussex County Council as The Lead Local Flood Authority, the Environment Agency and Adur District Council Drainage Team have been consulted through the application none of whom have objected to the Application proposals.</p>

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<p>6 <i>Referencing the evidence of letters on this further application from Southern Water (14th March 2022) it appears that this second phase of the Cala Homes build cannot be accommodated without reinforcements of the sewer network for fear of increased risks of foul flooding!!</i></p> <p><i>SW would have surely referenced their original approved sewer scheme for the complete New Monks Farm development. If they now have capacity concerns, it totally vindicates the community concerns that the original approval for the New Monks Farm was not fit for purpose!!</i></p>	<p>The letters from Southern Water are a standard planning enquiry response. We agree it would have been useful if Southern Water had referenced the existing agreements, agreed discharge rates and provided a bespoke response but we are not in control of their planning response team, who appear to have sent out a standard response.</p> <p>Following the Ofwat ruling in 2018 sewerage undertakers have an obligation to provide capacity where a direct connection into the existing public sewer is technically achievable, it is therefore Southern Water's responsibility to ensure there is adequate capacity within their sewer network. In their role as the Statutory Sewage Undertaker they are obligated to undertake suitable upgrades through investment using funds from the infrastructure charges which they now apply to all new development.</p> <p>In accordance with the 2018 Ofwat ruling and S106 of the Water Industry Act (1991) Southern Water are unable to refuse a connection to the public sewer, where the internal diameter of the new connecting pipework is no larger than the internal diameter of their existing network. The development has already agreed the connection to the Public Sewer and the rate of discharge has been agreed and is controlled through the new pumping station.</p> <p>The Applicant will continue to work with Southern Water in providing phasing and in relation to the timings of final connections foul water to assist Southern Water.</p>

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7 <i>They are calling for a phased occupation schedule for the 385 homes only some of which they say could be connected before reinforcement is required. They are requesting further consultation with the applicant. So far, on the planning portal, there is no evidence of either the phasing of occupation or the further consultation with reinforcement resolution for this key element of infrastructure and its sustainability.</i>	<p>The request for phasing of the development and agreement to discharge rates is normal for projects of this size.</p> <p>The applicant is prepared to accept a suitably worded Planning Condition as the development will be phased and there will be further S104 applications made to Southern Water to adopt the foul water system on site. The discharge rate will remain below that already agreed with Southern Water under the original condition there is no risk that the scheme will increase foul flood risk in the area.</p>
8 <i>We also wish to point out that the Old Salts Pumping Station serves the sewer line from the West Beach Estate with the significant problems which are ongoing there to re-line that main sewer. Is lack of Old Salts pumping capacity also exacerbating the West Beach issue? (That West Beach sewer line also serves the foul waste flows from the private sewer on the Shoreham Airport which will shortly be adding to its flows from the 25,000 sqm commercial development in the North East corner of the airport.)</i>	Noted, but this is not in the control of the Applicant and does not form a part of the current Planning Application proposals.
9 <i>Once again, this demonstrates inconsistencies when it comes to matters of Southern Water connection to sewer networks for large development applications. With current events, it is unsurprising that there is a lack of public trust in this utility provider.</i>	We cannot comment on the public trust in Southern Water, they are the Statutory Undertaker for foul water in the area and as such have a statutory duty to fulfil their obligations.

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10 <i>AFG is particularly worried that if approval is given for this reserved matters application, this foul waste infrastructure will be given a post approval condition. We believe a complete solution should come before planning committee for consideration prior to approval.</i>	The applicant has provided a complete solution to the foul water discharge from the site, it does not increase the discharge rate agreed with Southern Water from that of the original development.
11 <i>Management of foul waste flows is key infrastructure. AFG asks that no final decision be given for this application until this concern for increased risk to foul waste management is resolved</i>	There is no increased risk to the foul water network from the development proposals. Southern Water have not objected to the proposals and neither have the West Sussex as Lead Local Flood Authority, the Environment Agency or Adur District Councils Drainage Team.