

Southern Water DWMP: Response from Adur District Council

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Thank you for consulting us on Southern Water's first Drainage and Wastewater Management Plan (DWMP). We are grateful for the opportunity to be involved throughout this process.

Our local water environment is valued as an environmental and recreational asset as well as a critical resource. SustainableAW is a shared climate and nature plan between Adur District and Worthing Borough Councils and the wider community to create a more sustainable future for our area, this recognises water as a key action area with a commitment to improve water quality and reduce consumption.

For wastewater purposes both Adur and Worthing fall within the Adur and Ouse catchment. We are pleased to see that the impact of growth and planning has been identified. You will be aware that work is starting on the review of the Adur Local Plan (2017) and in particular the potential for higher numbers to be accommodated within the Shoreham Harbour Regeneration Area Western Arm (currently allocated for a minimum of 1,100 dwellings, but with potential for more). As a result significantly higher housing numbers could result within the lifetime of the Plan. We would expect the DWMP process to take account of the plan-making process and ensure emerging proposals are taken into account.

We agree with the list of main challenges on starting on page 10 of the DWMP. However, under challenge 2: population growth we would expect the text to recognise the role of Local Plans in allocating development sites and the presence of significant shortfalls in meeting local housing needs across the area. Furthermore the text notes that 'development... leads to more frequent overwhelming of our sewer systems and an increase the risk of flooding.' Whilst we recognise that more homes and more people will increase flows to the sewer network the text should recognise that national planning policy requires that development does not increase the risk of flooding.

Challenge 5: Keeping rivers, lakes, reservoirs and coasts healthy and clean. We are pleased to see recognition of coasts in the heading. However we would recommend that reference to bathing waters is included in the text. Residents and visitors to Adur and Worthing value our coastline and bathing waters. Adur and Worthing Councils have previously committed to improving the quality of bathing waters and have worked with Southern Water on the Bathing Water Enhancement Program and include as a commitment in SustainableAW to obtain and maintain Blue Flag awards for the foreshore which requires 'Excellent' bathing water quality.

We support the intention in the DWMP to move towards integrated and cross sector water management planning and the greater use of nature based solutions and sustainable drainage systems. However we consider further evidence is needed to establish where opportunities best exist to accommodate these. Within Adur it is certainly unclear where any

nature based solutions could be implemented which will deliver the improvements necessary to reduce CSO use and flooding.

On pages 52 and 53 it is stated that existing housing stock and infrastructure is the problem, and that future development should not be. In terms of existing housing, it is unclear how Southern Water can deliver improvements to existing housing and infrastructure. Retrofitting SuDS or separating combined systems is problematic. There is often insufficient space for SuDS. Separating systems is very expensive and disruptive to our already occupied communities. Southern Water has indicated that they will be expecting contributions from LPAs, LLFA, EA etc. Why funding should be provided by others, and how it can be is unclear. Increasing capacity of sewers may be the only deliverable option in some locations, this should be recognised and Southern Water should put funding in place for this.

In terms of future development, we recommend that Southern Water should align with the LLFA Surface Water Drainage Policy. In particular when considering proposals for development to utilise existing combined sewer connections we recommend Southern Water should require compliance with the SuDS hierarchy and where the combined sewer is the only option requiring greenfield QBar where possible, or as close to this as achievable with a minimum of 50% betterment.

Where future development is located within areas of known high groundwater levels it would be sensible for Southern Water to request higher standards for sewers which reduce infiltration potential. It would also help collaboration if Southern Water's criteria for adoption of SuDS is also aligned with the LLFA policy.

We support the investment plan for storm overflows (Planning Objective 5). It is noted that a number of storm overflows have been highlighted as requiring investment in the Shoreham and East Worthing catchment areas in the short to medium term, between now and 2040.

The draft DWMP acknowledges the recent media attention received as a result of storm overflow discharges which are stated as a yearly average of 45 for Shoreham and 43 for Worthing East catchment areas. The Council is understandably deeply concerned about the number of discharges and the negative impact this has on public health, the environment and designated bathing waters. The extent of recent discharge to coastal areas does highlight the need for more effective working with the LLFA and LA's to ensure a more robust approach towards SUDs and standards for new sewers as mentioned previously.

Shoreham is designated for bathing waters and the Council has aspirations to have further areas designated in the future including the river Adur. The Council already undertakes extensive water quality sampling on the river Adur in Shoreham and levels of Escherichia coli and Intestinal enterococci have been recorded at levels that are considered high and would have public health implications.

We would welcome the opportunity to set up a group to push forward river quality improvements for the Adur and ultimately achieve bathing water designation.

We hope these comments are helpful and we look forward to continuing to work with you on our Local Plans and other shared projects. If you have any queries or require further information please do not hesitate to contact us.