

Surface Water and Foul Drainage Supplementary Planning Document

Statement of Consultation



<http://www.chichester.gov.uk/policyguidance>

September 2016

Purpose and background

- 1.1 This Statement of Consultation has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires, alongside the publication of a Supplementary Planning Document, a statement setting out:
 - The persons the local planning authority initially consulted when preparing the SPD;
 - A summary of the main issues raised by those persons; and
 - How those issues have been addressed in the SPD.
- 1.2 This statement sets out detail of the consultation that has taken place, which has informed the development and modification of the Supplementary Planning Document (SPD).
- 1.3 It provides details of the formal consultation, including details of how, when and with whom this consultation took place; the issues that were raised and how they have been addressed in the final version of the Surface Water and Foul Drainage SPD that will be adopted by Chichester District Council.
- 1.4 The Planning and Compulsory Purchase Act 2004 sets out the requirements of the new planning system. This enables SPDs to be prepared to expand upon existing planning policy.
- 1.5 The preparation of an SPD is not a statutory requirement, but a decision for each Planning Authority. Chichester District Council consider it necessary to prepare a Surface Water and Foul Drainage SPD due to the particular challenges in the Local Plan area.
- 1.6 The National Planning Policy Framework (NPPF) supports the production of SPDs where they can help developers make successful applications or aid infrastructure delivery.
- 1.7 The Surface Water and Foul Drainage SPD does not create new policy but expands on the objectives and policies of the adopted Chichester Local Plan: Key Policies 2014-2029 (CLP). The CLP recognises that to deliver the growth sustainably and in a timely manner, the proper management of water and an understanding of whether existing infrastructure can cope with an increased demand are important.
- 1.8 This SPD combines and formalises the approach in the two background documents produced as evidence for the CLP. These are the Wastewater Position Statement January 2014 and the Update to Apuldram Wastewater Treatment Works July 2014. The Table(s) setting out the estimated remaining headroom are updated on a regular basis to take account of planning permissions granted and are essential to the application of this SPD.

Consultation process

- 2.1 The purpose of the consultation was to seek comments from stakeholders and members of the public on the draft Surface Water and Foul Drainage SPD. All statutory consultees were notified (City/Town/Parish Councils including those which adjoin the District in neighbouring local authority areas, relevant county authorities, adjoining local authorities, specific consultation bodies) as well as registered individuals and organisations on the Local Plan database, local agents, Elected members and various District Council and West Sussex County Council staff.
- 2.2 The consultation was advertised on Chichester District Council's website and the local press giving all those not on the Council's database an opportunity to take part in the consultation. The consultation ran for a period of six weeks from 10th March to 21st April 2016.
- 2.3 A total of 28 respondents made representations to the consultation and raised a total of 67 representations. Appendix 1 below provides details of the consultee representation and Chichester District Council's response.

Comment

Consultee	Mr David Lugton [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr David Lugton
Comment ID	SWDSPD1
Response Date	11/03/16 09:52
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.12
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

For years additional development has been allowed in Ifold despite numerous reports of sewage flooding gardens or houses due to the existing over capacity of the system. Development has not been sustainable due to these flooding problems. CDC planners have ignored these concerns and ignored Parish Council requests that Southern Water upgrade the system before additional development. Recently a planning application for 17 houses in Loxwood resulted in Southern water as a consultee saying the pumping station there could not cope without upgrade. All the sewage from Durfold wood flows down through the pipes through Plaistow which then goes through Ifold onto the pumping station in Loxwood. Despite this more than 17 new homes have been approved for development in Ifold and are still being approved not refused until the pumping station in Loxwood is upgraded. This just illustrates the concept of sustainable development is not followed by CDC in Ifold. IF CDC do actually intend to adhere to this plan then development in Ifold needs to stop until the pumping station in Loxwood is upgraded and significant investment made in the sewage pipe work in Ifold to deal with the additional capacity. To date I have been lucky enough not to have sewage coming up in my property a number of my friends unfortunately have not.

Is this approach appropriate? Yes

Please provide comments and/or amendments.

See above if genuinely adhered to by CDC.

Is there anything further that should be included? Yes

Please provide comments and/or amendments.

No further development in Durfold Wood, Plaistow and Ifold until the pumping station in Loxwood is upgraded and the existing sewage system in these locations upgraded to properly deal with the demand.

Officer Response

Comments and concerns noted. The Surface Water and Drainage SPD seeks to ensure that applicants have all the relevant information available when applying for planning permission. Flowchart 1 directs applicants to contact Southern Water or relevant service provider with regard to capacity and paragraph 10.5 requests applicants to contact Southern Water with regard to capacity in the sewer network. Paragraph 4.1 acknowledges the importance of there being sufficient infrastructure to accommodate development and Southern Water, as the service provider, is consulted on proposals for development. Following the response from Southern Water a planning condition can be applied to the planning permission. However, new development is only expected to address its own impact on existing infrastructure and not address existing deficits. Existing problems with sewerage network capacity should be addressed to Southern Water as the statutory undertaker responsible. This document can only deal with how local plan policies are applied in relation to new development. No amendment proposed.

Comment

Consultee	Ms Elizabeth Cleaver [REDACTED]
Email Address	planningse@highwaysengland.co.uk
Company / Organisation	Highways England
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Highways England (Ms Elizabeth Cleaver)
Comment ID	SWDSPD2
Response Date	11/03/16 10:48
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.4

Please provide comments and/or amendments.

We do not wish to make any comments on this SPD.

Officer Response

Comments are noted.

Comment

Consultee	Surrey County Council [REDACTED]
Email Address	planning.consultations@surreycc.gov.uk
Company / Organisation	Surrey County Council
Address	Environment and Infrastructure County Hall Kingston Upon Thames KT1 2DY
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Surrey County Council (Surrey County Council)
Comment ID	SWDSPD3
Response Date	11/03/16 16:19
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.5

Please provide comments and/or amendments.

We do not have any comments.

Officer Response

Comments are noted.

Comment

Consultee	Mr Paul Karas [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Paul Karas
Comment ID	SWDSPD4
Response Date	14/03/16 21:34
Consultation Point	11 Non-mains drainage (View)
Status	Processed
Submission Type	Email
Version	0.7
Is the document clear and understandable?	Yes
Is this approach appropriate?	Yes

Please provide comments and/or amendments.

We are off mains drainage and about 10 years ago we had a sewage treatment plant installed in place of a cess pit. This has worked well and doesn't cost too much to run. We are fortunate enough to be close to a free running stream which the EA have given us a discharge licence for. Our predecessors proudly said that they never emptied the cess pit - relying on leakage to get rid of the waste. And I know of others who say the same. I feel that you should have a definite policy to proscribe cess pits in all but the most unusual circumstances. Similarly, we were advised that the local clay soil would not be good for a septic tank either so I feel that you should be clear that these should be banned in many areas too. Which means that development off mains drainage should be a properly drained STP only.

Is there anything further that should be included? Yes

Please provide comments and/or amendments.

Your policy doesn't seem to cover or apply to many of the Traveller developments in our area. I believe that they are frequent users of Septic Tanks and Cess Pits and that many of the locations are not

suitable for regular sewage truck emptying. So they must be unsuitable sites for development of any kind. Surely your policy should be explicit in this case and traveller sites should be on mains drainage?

Officer Response

The Surface Water and Drainage SPD does not set policy, rather it gives guidance to applicants when applying for planning permission. There is a requirement to connect to mains in the first instance, however, where this is not feasible/viable, the Environment Agency are able (subject to assessment) to permit alternative proposals to main drainage. This is set out in Section 11. Add additional paragraph 11.6 as follows "**Applications for non-mains drainage need to comply with the binding rules by maintaining septic tanks and sewage treatment plants properly, and in perpetuity, and by ensuring they do not cause pollution. Further information can be found in Section 17.**"

Add the following to Section 17 Links and Further Guidance **General binding rules for small sewage discharges in England**

-<https://www.gov.uk/government/publications/small-sewage-discharges-in-england-general-binding-rules>

Add the following to Section 17 Links and Further Guidance **Septic tanks and treatment plants: permits and general binding rules** - <https://www.gov.uk/permits-you-need-for-septic-tanks>

Comment

Consultee	Mr Paul Karas [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Paul Karas
Comment ID	SWDSPD5
Response Date	14/03/16 21:34
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.8

Is there anything further that should be included? Yes

Please provide comments and/or amendments.

We were flooded in the 2012 floods and nearly flooded over a few occasions since. The root causes were a change in the drainage arrangements on the A27 in 2006 (using inappropriate standards for the storage bunds) and poor maintenance of streams by local landowners. We were caught in the middle and flooded. From a policy perspective, I note that you sometimes allow surface water drainage into the foul water system if there is suitable 'attenuation' by which I think you mean storage and slow release. I would recommend that you review the surface water and extreme event standards before you allow such things as when I last looked they were for classic storm drain design and not a storage system. I can provide your experts with details if need be. Similarly, I would welcome a clear policy on drainage attenuation systems which are clearly not being designed to the right standards - I can give your experts details.

Officer Response

The Surface Water and Drainage SPD does not set policy, rather it gives guidance to applicants when applying for planning permission and does not cover drainage of the A27. Paragraph 12.3 clearly states that surface water must not in any development, be discharged into the foul sewer system. The adopted Chichester Local Plan sets out in Policy 12 that no surface water from new development shall be discharged to the public foul or combined sewer system. The standard for SuDS is set out in Section 12. No amendment proposed.

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	fishbourneparishcouncil@gmail.com
Company / Organisation	Fishbourne Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Fishbourne Parish Council (Parish Clerk)
Comment ID	SWDSPD6
Response Date	16/03/16 15:57
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.5
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

Fishbourne Parish Council have no detailed reply to make to the consultation but it did wish to welcome the document and the importance it attached to the issue of surface water and drainage by making it a "material consideration".

Officer Response

Comments are noted.

Comment

Consultee	Mr Roy Seabrook [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Roy Seabrook
Comment ID	SWDSPD7
Response Date	16/03/16 17:08
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.5
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

There is no mention of existing problems with surface water management. Parish Councils have great difficulty and need considerable support in keeping ditches and watercourses clear and in good repair. Increasing surface flow in this way must only be done in conjunction with the identification and implementation of appropriate flood water meadows etc. to hold flood water and relieve flooding downstream.

Officer Response

New development is only expected to address its own impact on existing infrastructure and not address existing deficits. SuDS standards are set out in Section 12. No amendment proposed.

Comment

Consultee	Mr Roy Seabrook [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Roy Seabrook
Comment ID	SWDSPD8
Response Date	16/03/16 17:08
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Email
Version	0.12
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

It is of some concern that nominal waste water treatment plants' headroom have been increased, in the most part, by manipulation of the mathematical models rather than actual material improvements.

- 1 Averaging flow rates over **seven** years instead of **four** years as previously done, gives a higher nominal headroom but at the expense of greater vulnerability to extreme weather.
- 2 Reduction of the standard nominal water use per person from 180 lts per day to 110 lts per day will again appear to give a greatly increased headroom but the validity of this huge change must be subject to question.

Officer Response

Comments and concerns noted. The issue with regard to the Dry Weather Flow calculations used to inform the estimated remaining headroom has been previously addressed through meetings with Chichester District Council, the Environment Agency, Southern Water, Chichester Harbour Conservancy, Natural England and Southbourne Parish Council. No amendment proposed.

Comment

Consultee	Mr Christopher Emerson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Christopher Emerson
Comment ID	SWDSPD9
Response Date	17/03/16 14:59
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.10

Please provide comments and/or amendments.

We are obviously against any proposal which will increase the probability of our home being flooded.

Officer Response

The Surface Water and Drainage SPD does not allocate sites for development and seeks to ensure that new development does not exacerbate existing problems and increase the risk of flooding. No amendment proposed.

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Paul Sansby
Comment ID	SWDSPD10
Response Date	26/03/16 13:29
Consultation Point	Box 2 Tangmere (View)
Status	Processed
Submission Type	Web
Version	0.5
Is the document clear and understandable?	No

Please provide comments and/or amendments.

Tangmere WWTW discharges into Aldingbourne Rife which is already in 'Poor' condition under the WFD. It is conceivable that there will be 'no deterioration' in condition if the existing flow is quadrupled. In addition to water quality concerns there is the requirement under the WFD to meet high flow criteria. Aldingbourne Rife is an ephemeral stream with little or no natural flow in summer at the point of discharge. Increasing the flow due to the proposed expansion of the WWTW will fail the high flow test of the WFD. To achieve compliance the strategy should be looking to reduce or remove un-natural flows from the Rife. The EA has recently published its RBMP and this states that Aldingbourne Rife is at a high risk of deterioration and that it is at risk of serious damage. The WWT policy for the area will have to be revised and this Supplementary Planning Document will have to reflect this revision.

Aldingbourne Rife is also subject to an EA flood investigation and potential capital scheme. Once again it would be inconceivable to allow the base flow to quadruple when the existing flow causes flooding problems.

Is this approach appropriate? No

Officer Response

Comments and concerns noted. Chichester District Council worked closely with the Environment Agency and Southern Water to ensure that the proposed growth scheme at the Tangmere Wastewater Treatment Works will not cause a deterioration to the existing condition of the Aldingbourne Rife.

Paragraph 3.3 of the Surface Water and Drainage SPD states that the aim of the document is to ensure that the quality of the water environment does not deteriorate further as a result of new development. No amendment proposed.

Comment

Consultee	Mr Robert Carey [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Birdham & Earnley Flood Prevention Group
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Birdham & Earnley Flood Prevention Group (Mr Robert Carey)
Comment ID	SWDSPD11
Response Date	27/03/16 14:37
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.11

Please provide comments and/or amendments.

The document should contain a brief paragraph about the new Medmerry Estuary and Nature Reserve, which is a designated SPA and a European Compensatory site. A number of local streams or rifes feed into Medmerry. Section 118 of the NPPF applies.

Officer Response

Proposed additional wording to paragraph 3.1 end of second sentence " ... Chichester and Pagham Harbours **and Medmerry Managed Realignment** ".

Proposed additional wording to paragraph 3.1 end of third sentence " ... emerging from the South Downs **and Manhood Peninsula** ".

Comment

Consultee	Mr David Blythe [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr David Blythe
Comment ID	SWDSPD12
Response Date	06/04/16 13:40
Consultation Point	Box 2 Tangmere (View)
Status	Processed
Submission Type	Web
Version	0.7
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

There is no information about the Tangmere WwTW discharge. The current capacity of Tangmere WwTW is such that the discharge causes flooding of the Aldingbourne Rife in the Arun DC area. This can only get worse if the Capacity of Tangmere WwTW increases. There are also plans within Arun DC to build hundreds of new homes in this area. The Surface Water and Drainage (SPD) needs to address the flooding risks in the Tangmere/ Aldingbourne areas.

Officer Response

Comments and concerns noted. Chichester District Council worked closely with the Environment Agency, West Sussex County Council and Southern Water to ensure that the proposed growth scheme at the Tangmere Wastewater Treatment Works will not cause a deterioration to the existing condition of the Aldingbourne Rife or add to existing flooding issues. Paragraph 3.5 of the Surface Water and Drainage SPD states that it is important to ensure that new development does not exacerbate existing problems and increase the risk of flooding.

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	singletonparishcouncil1@gmail.com
Company / Organisation	Singleton Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Singleton Parish Council (Parish Clerk)
Comment ID	SWDSPD13
Response Date	10/04/16 23:15
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.7

Please provide comments and/or amendments.

To understand surface water management in our parish it is necessary to understand the problems we have with groundwater.

Singleton and Charlton sit in a chalk valley and on occasion suffer from high groundwater levels. During such times, lengthy or sudden downpours can produce flooding to certain homes in both villages. Due to the groundwater under pressure creating springs by permeating cracks in the chalk slab; where houses are built over these, spring water comes up through the floors. In extreme circumstances the level of the River Lavant can also cause overtopping onto the A286 and Charlton Road. Heavier flooding occurs approximately every twenty years with a lesser event approximately every ten years. Between the hamlet of Charlton and Singleton there is The Leys meadow which takes a lot of the flood water and contains many springs.

In 2008 when thirteen social housing properties were built here outside the Settlement Boundary and next to The Leys Meadow, a large drainage ditch was built at considerable cost which takes groundwater from the site into a large pipe and discharges into the river downstream of the village.

During winter/spring months the Parish also suffers from a dysfunctional sewer which suffers from the ingress of groundwater and leads to the need to over – pump some of the fluvial contents into the River Lavant in several locations. This is a yearly event.

The parish therefore believes all new housing should have means by which the run off from roofs are either collected for use in the garden or discharged into a soakaway.

The parish is becoming more and more under pressure for parking for visitors to the National Park and nearby attractions and also for local use. It is preferred all new parking be permeable so as not to exacerbate the speed of drainage such as tarmac would. We would also prefer parking to look as natural as possible in already grassed areas by the use of protection mesh rather than see the parish green areas ruined.

Until the sewer problems are solved we believe there should be no further building within the parish which may cause a risk by damage to the environment or human health.

Officer Response

Comments and concerns are noted, however, as explained in paragraph 2.1, the Surface Water and Drainage SPD applies to the area covered by the adopted Chichester Local Plan. It excludes that part of the district covered by the South Downs National Park. It would be for the South Downs National Park Authority to consider the concerns raised.

Comment

Consultee	Mr and Mrs W Townsend [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr and Mrs W Townsend
Comment ID	SWDSPD14
Response Date	11/04/16 15:18
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.8
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

We would like to comment on the inadequate sewage network which currently serves Plaistow/Ifold and Loxwood, particularly Ifold, which receives all foul water drainage from Plaistow before passing on to the Loxwood Sewage Treatment Plant.

It is quite clear that the sewage network in Ifold is totally incapable of handling further input from future development as can be witnessed from the comments of many residents, over the years in Ifold, including ourselves, where we experience back flows in the system causing manholes to regurgitate raw sewage on to the property particularly during heavy rainfall. It has been an historic fact that the system in Ifold is archaic and has been unable to cope for many years and has been exacerbated by windfall development, particularly over the past 10 years, of some 40 new dwellings and is now beyond its intended capacity.

No further development, windfall or otherwise, should be permitted in the Ifold Settlement Policy Area until considerable upgrading of the present system, including the Loxwood Treatment Works, has been completed.

Southern Water has confirmed this to be the case in correspondence relating to recent Planning Applications (for example PS/15/02639/FUL).

Is this approach appropriate?	Yes
--------------------------------------	-----

Is there anything further that should be included? No

Officer Response

Comments and concerns noted. The Surface Water and Drainage SPD seeks to ensure that applicants have all the relevant information available when applying for planning permission. Flowchart 1 directs applicants to contact Southern Water or relevant service provider with regard to capacity and paragraph 10.5 requests applicants to contact Southern Water with regard to capacity in the sewer network. Paragraph 4.1 acknowledges the importance of there being sufficient infrastructure to accommodate development and Southern Water, as the service provider, is consulted on proposals for development. Following the response from Southern Water a planning condition can be applied to the planning permission. However, new development is only expected to address its own impact on existing infrastructure and not address existing deficits. No amendment proposed.

Comment

Agent	Mr David Wilson [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Savills UK
Address	[REDACTED]
Consultee	Ms Carmelle Bell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Thames Water Utilities Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Thames Water Utilities Ltd (Ms Carmelle Bell)
Comment ID	SWDSPD15
Response Date	11/04/16 14:42
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.9

Please provide comments and/or amendments.

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage and wastewater treatment infrastructure.

Wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to:

- 1 improve water quality
- 2 provide opportunities for water efficiency
- 3 provide enhanced landscape and visual features
- 4 support wildlife
- 5 and provide amenity and recreational benefits.

Is there anything further that should be included? Yes

Please provide comments and/or amendments.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the SPD : **“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”**

Officer Response

The proposed additional wording is already included in the Surface Water and Drainage SPD at paragraph 12.3 which sets out the hierarchy for developers to consider when discharging surface water. No amendment proposed.

Comment

Consultee	Mr D.J. West [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Bosham Association
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Bosham Association (Mr D.J. West)
Comment ID	SWDSPD16
Response Date	12/04/16 09:01
Consultation Point	10 Other Catchments (View)
Status	Processed
Submission Type	Web
Version	0.10
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

The Bosham Association would wish to point out that even before any new development takes place within the village we have had sewage discharging up through manholes in some of our streets in times of heavy rainfall due to the ingress of surface water into the porous pipes mainly to the north. This effectively challenges the definition of "sufficient headroom" within the drainage system to cope with more development. As this document is mainly for guidance to potential developers we would expect the Chichester District Council to revisit this situation with Southern Water who have a statutory responsibility to ensure that the drainage infrastructure is fit for purpose.

Is this approach appropriate? Yes

Is there anything further that should be included? No

Officer Response

The estimated remaining headroom is associated with the capacity at Wastewater Treatment Works rather than the drainage network. These terms are explained in the glossary on page 31. The Surface Water and Drainage SPD encourages new development to consider using plastic pipes (page 19) and

the document has been produced in close partnership working with Southern Water. No amendment proposed.

Comment

Consultee	Mr D.J. West [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Bosham Association
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Bosham Association (Mr D.J. West)
Comment ID	SWDSPD17
Response Date	12/04/16 09:03
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Web
Version	0.6
Is the document clear and understandable?	Yes
Is this approach appropriate?	Yes

Please provide comments and/or amendments.

The recommendations and requirements stipulated in this section are sensible and reasonable however there has to be a means of enforcement in place to ensure that the guidance/requirements are carried out in the correct manner and in the proper timescale in the construction process. There is no point in stating these conditions if there is no meaningful enforcement structure to prevent errors or non-compliance.

Is there anything further that should be included? No

Officer Response

SuDS can be subject to a S106 agreement or controlled by a planning condition. Either way provides a means of ensuring compliance or preventing a potential breach. No amendment proposed.

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	parish.clerk@boshamvillage.co.uk
Company / Organisation	Bosham Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Bosham Parish Council (Parish Clerk)
Comment ID	SWDSPD18
Response Date	14/04/16 12:13
Consultation Point	10 Other Catchments (View)
Status	Processed
Submission Type	Web
Version	0.6
Is this approach appropriate?	Yes
Is there anything further that should be included?	Yes

Please provide comments and/or amendments.

Whilst Bosham WwTW has remaining headroom sufficient to meet the needs of the Local Plan there is a long standing problem with groundwater infiltration into the Public Sewer which overwhelms the pumping station at Stumps End and causes sewage overflows as well as significant CSOs into the northern reaches of the Harbour. Southern Water have twice confirmed in 2015 that there is currently inadequate capacity within the sewer network and that it may be several years before adequate infrastructure is provided. If you are proposing developments in these catchments please check with Southern Water that capacity can be made available within the sewer network.

Officer Response

The Surface Water and Drainage SPD has been produced in close partnership working with Southern Water and they are consulted on planning applications. No amendment proposed.

Comment

Consultee	Mr Martin Small [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Historic England
Address	Historic England Eastgate Court Guildford GU1 3EH
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Historic England (Mr Martin Small)
Comment ID	SWDSPD19
Response Date	15/04/16 14:01
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.4


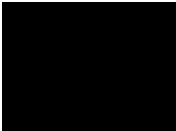
Please provide comments and/or amendments.

Having considered the document, Historic England has no comments to make.

Officer Response

Comments are noted.

Comment

Consultee	Mr J.A. Cole 
Address	
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr J.A. Cole
Comment ID	SWDSPD20
Response Date	27/03/16 10:19
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Letter
Version	0.6

Please provide comments and/or amendments.

I should like to draw your attention to the very important land drain which runs north to south to the east of Chestnut Cottage on the Elsted Road out of South Harting. This stream takes excess water off the downs at times of heavy rainfall, and runs through a gully under the Elsted Road and continues across country in a generally southerly direction.

This gully is at the point of a potential flood plain if not properly drained, and therefore constitutes a danger to nearby houses, and can very easily be obstructed by loose twigs and detritus in the stream. Recently it was seriously overgrown and in need of clearing, and I was able to get it cleared with considerable difficulty, and only with the intervention of both the Chichester District Councillor and the County Councillor.

I hope therefore that it can be duly recorded in your Supplementary Planning Document, so that it is not entirely neglected in the future as it has been in the past. It has only been cleared twice in the last 25 years, and on both occasions only as a result of my representations.

Officer Response

Comments and concerns are noted. This information has been passed to the Coastal and Land Drainage Team, however, as explained in paragraph 2.1, the Surface Water and Drainage SPD applies to the area covered by the adopted Chichester Local Plan. It excludes that part of the district covered by the South Downs National Park.

Comment

Consultee	Mr Paul Knappett [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Paul Knappett
Comment ID	SWDSPD21
Response Date	19/04/16 13:05
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Web
Version	0.9
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

This Supplementary Document clearly shows like its parent document that CDC Wastewater policy are not working and cannot work. If its parent document was robust there would be no need for this Supplementary Document. Less than 7 months into the life of the new Local Plan and CDC need to produce a Drainage Supplementary Document? This action must speak volumes about the parent document.

Is this approach appropriate? No

Please provide comments and/or amendments.

The whole Wastewater Policy for the Chichester area needs to be revisited because the one in place is not fit for purpose and was conceived on massaged headroom number and a wing and a pray. The economic growth and the well being of the citizens of Chichester and the surrounding areas are at stake without a credible, workable and achievable Wastewater Policy in place. This Drainage Supplementary Document is akin to a doctor using a plaster to stop a major artery bleed.

Is there anything further that should be included? No

Officer Response

As explained in paragraph 2.4 of the Surface Water and Drainage SPD, the document combines and formalises the two background documents used as evidence for the adopted Chichester Local Plan. Neither these background documents nor this SPD is policy. Policy 12 Water Management in the Apuldram Wastewater Treatment Catchment of the adopted Chichester Local Plan sets out the policy criteria for development in the Apuldram catchment, the Surface Water and Drainage SPD provides clarity and guidance to developers and applicants (paragraph 2.2). The Surface Water and Drainage SPD was produced in partnership with the Environment Agency, Southern Water, Natural England, West Sussex County Council and Chichester Harbour Conservancy. The document is included in the Local Development Scheme which was adopted in July 2015.

Comment

Consultee	Mr Paul Knappett [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Paul Knappett
Comment ID	SWDSPD22
Response Date	19/04/16 13:06
Consultation Point	Box 1 (View)
Status	Processed
Submission Type	Web
Version	0.10
Is the document clear and understandable?	Yes
Is this approach appropriate?	No

Please provide comments and/or amendments.

CDC claim in the Local Plan that the Apuldram WwTWs had an available headroom (depending on who's figure you pick) of 700 (Southern Water) or 770(CDC) and could services the wastewater needs of the housing numbers required within its catchment area for the lifetime of the Local Plan (2014 to 2029). However this is not the case if one delves into the number of sites that have been granted planning permission from 2006 to 2014.

I have established with CDC that the headroom number from 2006 to 2029 is 3000 for the Apuldram WwTWs and that number is finite. Having used data supply to me by CDC between 1st April 2006 and 20th June 2014 that headroom number of 3000 was eroded by 2530. This leaves headroom of 470. One must then deduct from this 470 the sites that CDC has failed to keep a record of?

Example of these sites are: 72 Bed care home at Roussillon Barracks, 321 Student Bedrooms on the former Chichester girls school, 88 bedrooms hall of residence in the Edwardian school building also on the former girl schools site, 76 Bedroom hotel in Chapel Street. These are by no means all of the uncounted sites just ones that stand out. These uncounted sites eroded that 470 number by a further 188 that then leaves headroom of 282. We must then further erode this headroom number for the uncounted industrial developments. It would not be unreasonable to deduct 10 units per year for these uncounted developments, April 1st 2006 to April 2016 = 100.

We are now left with a headroom of 200 which is further eroded by windfall sites for Chichester City. CDC stated in the Local Plan that this number was 100 dwelling per year as this was based on previous

level of development. However within the last couple of days I have been informed that this was an error and the assumed levels of development are 584 for the whole Local Plan area?

As the 100 houses per year were based on actually previous levels of development it would follow that future levels of windfall sites would be around the same number. For the purpose of robustness we will reduce this number to only 50 per year.

If we now reduce the remaining 200 headroom by 100 for the period 20th June 2014 to 20th June 2016 that would then only leave a headroom number of 100 to services the wastewater needs for the remaining 13 years of the Local Plan. This of course is assuming there are no more uncounted developments.

Southern Water have now publicly stated that there is no longer any capacity available at this WwTWs and provision of further capacity at this WwTWs will require Major investment and will have a significant lead time (5 to 10 years)

The Environment Agency have also recently acknowledge that there are headroom issues with this WwTWs and have stated once the finite numbers have been reach it will reinstate their previous position statement.

This document fails to fully address these issues so is not fit for purposes.

Officer Response

Comments and concerns noted. Chichester District Council along with West Sussex County Council, Southern Water, the Environment Agency, Natural England and Chichester Harbour Conservancy have worked together since 2009 to ensure that the data and approach used is appropriate and are satisfied that the conclusions made are correct. Chichester District Council has had a number of previous communications with Mr Knappett and not withstanding the difference in interpretation of the data from Mr Knappett, the Council is satisfied that its approach is correct. No amendment proposed.

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD23
Response Date	20/04/16 09:10
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.11

Please provide comments and/or amendments.

2.2 Relationship with other Planning Documents We note that the above section refers to policy 42 (Flood Risk Management) of the adopted Chichester Local Plan but that the SPD focuses only on surface water and drainage. In our view, it would be useful to widen the scope of the document to recognise that surface water is only one of the contributory causes to flood risk. Paragraph 6 of the National Planning Practice Guidance (Reference ID: 7-006-20140306) outlines that lead local flood authority is responsible for managing local flood risk, including from surface water, ground water and ordinary water courses. This is reiterated in the paragraph 100 of the National Planning Policy Framework, which also directs local planning authorities to work with lead local flood authorities to secure planning polices compatible with the local flood risk management strategy and manage flood risk from **all** sources.

Officer Response

Comments noted. Policy 42 is incorrectly referenced in paragraph 2.2, the Policy relates to Flood Risk and Water Management. Paragraphs 2.3-2.5 explain the parameters of the Surface Water and Drainage SPD. Supplementary Planning Documents are not able to set policy, this is set out in Policy 42 of the adopted Chichester Local Plan: Key Policies 2014-2029, which seeks to manage flood risk from all sources. Whilst it is recognised that there are other forms of flooding, the SPD has been drafted to deal with issues that are particularly relevant to Chichester. No amendment proposed.

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD24
Response Date	20/04/16 09:10
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

Paragraph 2.6 implies that the SPD will be used in the determination of all planning applications and appeals. Minor developments (such as extensions to non-residential buildings and householder development) are unlikely to raise significant issues.

Suggest the following amended wording to the first sentence of paragraph 2.6: This SPD will be a material consideration when assessing planning applications or appeals **(other than for minor development)**

Officer Response

Comments are noted. Amend paragraph 2.6 as follows: "This SPD will be a material consideration when assessing planning applications or appeals **for any net new dwelling(s)** and will be"

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD25
Response Date	20/04/16 09:10
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.7

Please provide comments and/or amendments.

Paragraph 3.4 indicates that flooding occurs due to a lack of capacity in the sewerage network. However, the issue is that during periods of heavy rain, water inundates the sewerage system and compromises its functioning, as the system is not designed to take water that should be dealt with by appropriate land drainage.

Propose the following amendments to reflect this situation: '3.4 The south of the plan area is particularly flat and low-lying, being part of the coastal plain.....Whilst there is a risk of river and coastal flooding, a number of areas have suffered from surface water and foul water flooding due to ~~a lack of capacity and infiltration~~ into the sewer network **during periods of heavy rain**.'

Officer Response

Amend last sentence of paragraph 3.4 as follows: " foul water flooding due to ~~a lack of capacity and infiltration~~ into the sewer network **during periods of heavy rain**.'

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD26
Response Date	20/04/16 09:10
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

As mentioned above, we consider that clarity should be provided as to the type of application that this SPD would apply to. Article 2(1) of the Town and Country (Development Management Procedure) (England) Order 2012 requires the Local Lead Flood Authority to be consulted on developments of 10 dwellings or more so that they can be satisfied that surface water measures are appropriate.

To be consistent with this approach, we suggest the following amendments to paragraph 4.4: 'The Local Plan provides direction for the strategic development locations with regard to foul drainage, however, in order to support smaller scale **residential** development **of 10 or more units**, the following flowcharts and supporting text will guide...'

Officer Response

Comments are noted. The overall aim of the Surface Water and Drainage SPD is to provide advice to developers and consultants when preparing planning applications for any additional development, no matter which wastewater treatment catchment they require. The suggested amendment would allow for incremental development that could adversely affect the water environment. No amendment proposed.

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD27
Response Date	20/04/16 09:10
Consultation Point	Flowchart 1 - All Catchments (View)
Status	Processed
Submission Type	Email
Version	0.14

Please provide comments and/or amendments.

For the sake of clarity, it is suggested that the word 'Main' used throughout the document (including the above flowchart and definition in 16.7) should be changed to 'Public Foul Sewer'. The convention is that a 'Main' is used to supply water whilst a 'Sewer' carries away wastewater. To ensure that surface water is also addressed by a proposed development, it is suggested that the boxes indicating that a planning application could be submitted, should be amended to require a detailed Drainage Strategy i.e. 'Submit Planning Application with **detailed Drainage Strategy including** connection to **Public Foul SewerMains**'.

Officer Response

Comments are noted. Delete " Mains " where relevant and replace with " **public foul sewer**". Paragraph 153 of the National Planning Policy Framework requires that 'SPDs should help applicants or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.' Paragraph 193 requires that 'Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.' Add " **supporting documents** " , " **mitigation proposals** " or " **Drainage Impact Assessment** " to appropriate boxes in the Flowcharts. It would be unreasonable to require a Drainage Impact Assessment for all new residential properties.

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD28
Response Date	20/04/16 09:10
Consultation Point	Flowchart 1 - All Catchments (View)
Status	Processed
Submission Type	Email
Version	0.4

Please provide comments and/or amendments.

We note that our contact details are on the last page but it might be useful to include them in paragraph 10.5 or include a reference to the contact details in section 18 on page 33.

Officer Response

Add the following text to the end of paragraph 10.5: "**Contact details can be found in Section 18.**"

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD29
Response Date	20/04/16 09:10
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.10

Please provide comments and/or amendments.

Our expectation is that surface water will not be permitted to drain to the foul or combined sewerage system unless all other options have been explored in line with Part H3 of Building Regulations 2000. The National Planning Practice Guidance (paragraph 79, Reference ID:7-079-20150323) states that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Accordingly, we largely welcome the approach in paragraph 12.3.

We take this opportunity to point out that 'Open Form' solutions (mentioned in paragraph 12.7) should be designed and constructed so as not to allow the ingress of ground water or land drainage throughout the life span of the 'Open Form' structure.

Officer Response

Support noted. Criteria 2 of Policy 12 Water Management in the Apuldrum Wastewater Treatment Catchment of the adopted Chichester Local Plan requires that no surface water from new development shall be discharged to the public foul or combined sewer system. The final sentence of paragraph 12.3 of the Surface Water and Drainage SPD states that water must not in any development, be discharged into the foul sewer system. No amendment proposed.

Comment

Consultee	Mrs Susan Solbra [REDACTED]
Email Address	planning.policy@southernwater.co.uk
Company / Organisation	Southern Water
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Southern Water (Mrs Susan Solbra)
Comment ID	SWDSPD30
Response Date	20/04/16 09:10
Consultation Point	13 Water Efficiency (View)
Status	Processed
Submission Type	Email
Version	0.5

Please provide comments and/or amendments.

We note the recommendation that plastic pipes should be used to connect into the sewerage network. However, we would like to point out that ingress can be through pipe joints, joints to manholes and inspection chambers and leakage at the interface between the pipe and the chamber. The use of plastic pipes alone does not prevent this ingress. The pipe can also deteriorate and this can happen during maintenance and the clearance of blockages by jetting. Generally, plastic pipes have low resistance to jetting.

Accordingly, we consider that the materials and the design of pipe systems should be robust and propose the following wording to the box at the top of page 19:

'We would recommend that in designing your developments you consider the use of plastic pipes **or similar material along with secure joints** for any foul and surface water drains or sewer connecting in to the public foul sewer **to prevent the ingress of ground water or land drainage into the public sewer**.'

Officer Response

Amend Box on page 19 as follows: We would recommend that in designing your developments you consider the use of plastic pipes **or similar material along with secure joints** for any foul and surface water drains or sewer connecting in to the public foul sewer **to prevent the ingress of ground water or land drainage into the public sewer**.'

Comment

Consultee	Mr Paul Knappett [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Paul Knappett
Comment ID	SWDSPD31
Response Date	20/04/16 22:27
Consultation Point	Box 2 Tangmere (View)
Status	Processed
Submission Type	Web
Version	0.6
Is the document clear and understandable?	Yes
Is this approach appropriate?	No

Please provide comments and/or amendments.

One of the key risks to the Tangmere WwTWs (TWwTWs) is the lack of dilution of the wastewater discharged from TWwTWs by the flow of the Aldingbourne rife. The point where the wastewater from TWwTWs enters the Aldingbourne rife is little more than a very small stream.

This fact is reflected in its present condition which is listed by Environment Agency (EA) as "bad ".The Aldingbourne rife at the point where the wastewater from the TWwTWs discharges is only "bad" because of the TWwTWs and for no other reason.

If it is "bad" with only the wastewater from 2530 dwellings discharging in to it what condition will it be in when there is the wastewater from 5530 dwellings? Even in the best case scenario it would still be "bad" how can that be something that CDC think is acceptable which they must do because they are allowing it to take place, and even endorsing and promoting it. For a Local authority to condone the pollution of a waterway I find most worrying?

If the EA requires the condition of the Aldingbourne rife to be raised to "good" status (as it should) this would limit any increase in capacity at the TWwTWs.

The other risk to the TWwTWs is the flooding it may cause downstream and what action will be needed to prevent this happening. It is widely accepted that the pumping station and tidal sluices at Felpham would need to be upgraded before any further water could be discharged into the Aldingbourne rife. However it is unknown who would pay for these improvements or when they will be implemented?

There are a lot of unanswered question surrounding this WwTW and this document does not address any of them and is not fit for purpose.

Officer Response

Comments and concerns noted. Chichester District Council worked closely with the Environment Agency and Southern Water to ensure that the proposed growth scheme at the Tangmere Wastewater Treatment Works will not cause a deterioration to the existing condition of the Aldingbourne Rife. Paragraph 3.3 of the Surface Water and Drainage SPD states that the aim of the document is to ensure that the quality of the water environment does not deteriorate further as a result of new development. No amendment proposed.

Comment

Consultee	Mr Alan Pearson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Alan Pearson
Comment ID	SWDSPD32
Response Date	21/04/16 07:17
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.8
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

We moved into our property in 1993.

We have experienced surface water run off flooding (involving foul sewage) into the rear and front gardens from the "stream" in our garden as follows:

1994 - Winter (three times) 1995 - Winter 1996 - Winter 1997 - Winter 2000 - August and October 2004 - November 2013 - 23rd December

The last event was the worst, with our property within 4-6 inches of being flooded with surface and foul sewage.

A car was flooded and written off in this event, which was caused in part by the failure of the pumping station at Loxwood and the overall lack of capacity in the sewerage system, which was apparent in 1993 and much earlier. CDC and WSCC have done absolutely nothing about this other than add to development in the area. How are CDC going to FINALLY address this with Southern Water and Ifold Estates, who are the owners of many drainage ditches in Ifold?

Is this approach appropriate?	Yes
--------------------------------------	-----

Officer Response

Concerns are noted. West Sussex County Council, as the Lead Local Flood Authority, would be consulted with regard to culverting and surface water drainage and Southern Water would be consulted as part of the planning application process to ensure there is adequate infrastructure to convey, manage, treat and discharge the wastewater. Existing problems with sewerage network capacity should be addressed to Southern Water as the statutory undertaker responsible. This document can only deal with how local plan policies are applied in relation to new development. No amendment proposed.

Comment

Consultee	Mr Alan Pearson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Alan Pearson
Comment ID	SWDSPD33
Response Date	21/04/16 07:20
Consultation Point	Box 3 (View)
Status	Processed
Submission Type	Web
Version	0.5
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

I have seen no evidence of any consultation within the Ifold area between CDC, Southern Water, Parish Councils, Ifold Estates and the residents. How and more importantly when will this review of lack of infrastructure and the poor record of stability take place?

Is this approach appropriate? Yes

Is there anything further that should be included? No

Officer Response

Southern Water, amongst other Statutory Bodies, Parish Councils and residents have been consulted on the Surface Water and Drainage SPD, as well as the various stages leading to the adoption of the Chichester Local Plan. They are also consulted as part of the planning application process. More background evidence relating to wastewater infrastructure will be obtained to inform the review of the Local Plan.

Comment

Consultee	Mr Alan Pearson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Alan Pearson
Comment ID	SWDSPD34
Response Date	21/04/16 07:21
Consultation Point	Box 4 (View)
Status	Processed
Submission Type	Web
Version	0.4
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

The statement is fine provided the sewerage systems are all working and have capacity - absolutely should NOT apply in Ifold

Is this approach appropriate? No

Please provide comments and/or amendments.

As above

Is there anything further that should be included? No

Officer Response

Comments are noted.

Comment

Consultee	Mr Alan Pearson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Alan Pearson
Comment ID	SWDSPD35
Response Date	21/04/16 07:26
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Web
Version	0.9
Is the document clear and understandable?	Yes
Is this approach appropriate?	No

Please provide comments and/or amendments.

The theory may be fine but the practicality is not.

CDC appear to think that provided the development apparently meets the standards that it should be permitted.

In practice what happened to us was that the SUDS vortex manhole allowed in the development adjacent to our property was not maintained and contributed to our garden being under three feet of water in 2013. There needs to be a mechanism for CDC to ensure that these systems are maintained in perpetuity or the system is not a system fit for purpose if maintenance is not built in

Is there anything further that should be included? No

Officer Response

Concerns and comments noted. Paragraph 12.10 highlights the need for SuDS schemes to demonstrate the future management, funding and maintenance.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD36
Response Date	19/04/16 17:51
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.10

Please provide comments and/or amendments.

Paragraphs 3.3-3.6 are points stated quite 'strongly', but unfortunately the wording of the later, more detailed sections is not as strong.

Flooding is flooding, whether the cause is a river, the sea or an overloaded sewer. Should the SPD, which relates to these documents, be made to take account of the capacity of the existing drainage / sewer systems in the same way that Flood Zones 2 and 3 above are considered, particularly for areas which are close to both rivers and the sea and where the capacities of drainage / sewer systems and even the ability to absorb further ground water - may already be limited.

For example - if the capacities of existing drainage / sewer systems are limited, such that the additional flows from new developments would result in the surrounding area or lower parts of the catchment having a 1 in 100 or greater probability of flooding, the area should be considered as being in Flood Zone 3a.

Or similarly, if between 1 in 100 and 1 in 1000 probability, then the area should be considered as being in Flood Zone 2. This would then bring in the sequential risk-based approach.

Officer Response

Comments are noted. For either a Wastewater Treatment Works or Public Sewer Network to be assessed in this way would need a change of policy from Government. Paragraph 3.5 of the Surface Water and Drainage SPD acknowledges the importance of new development not exacerbating existing problems and increasing the risk of flooding. No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD37
Response Date	19/04/16 17:51
Consultation Point	5 Flow Charts (View)
Status	Processed
Submission Type	Email
Version	0.7

Please provide comments and/or amendments.

It would be a much better situation if CDC / STC were provided with capacity information (of foul and surface water networks and treatment capacities) in advance by Southern Water and WSCC as appropriate – so that this could be reflected in and allowed for in the Local Plan and Neighbourhood Plan(s) – and so that the community did not run the risk of playing ‘catch-up’ when development plans were submitted – ie that the community would have advance knowledge of capacities and be able to influence development proactively.

Tables are provided for the various wastewater treatment works but not for the related network infrastructure which transport the water and wastewater – and which can be more important to the local communities who may be at risk from flooding.

Officer Response

Comments are noted. Southern Water are consulted on planning applications and discuss with developers the capacity of the network. Chichester District Council and Southern Water work together to provide information on the capacity at the Wastewater Treatment Works. No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD38
Response Date	19/04/16 17:51
Consultation Point	8 Box 3 (View)
Status	Processed
Submission Type	Email
Version	0.5

Please provide comments and/or amendments.

There is a potentially serious 'dis-connect' here. The wording above is in the section relating to wastewater (sewers and treatment works). The foul sewers (responsibility of Southern Water) and the surface water drainage systems – ie sewers and other infrastructure (part responsibility of Southern Water, part responsibility of West Sussex County Council) – may be indistinguishable on the ground. Yet if surface water (eg from a new development) is connected into the foul system, the consequences can be severe – for the local community if flooding occurs, and for the treatment works – if capacity is taken up by additional flows.

The whole of the foul and surface water infrastructure should be visible to the local council (CDC / STC) so that people 'on the ground' can be certain which system is which and avoid the risk of incorrect connections.

Officer Response

Comments are noted. Paragraph 12.3 of the Surface Water and Drainage SPD and criterion 2 of Policy 12 of the adopted Chichester Local Plan state that surface water must not in any development be discharged into the foul sewer system. Southern Water and West Sussex County Council are consulted on planning applications. No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD39
Response Date	19/04/16 17:51
Consultation Point	10 Other Catchments (View)
Status	Processed
Submission Type	Email
Version	0.5

Please provide comments and/or amendments.

It would be better for the community if this information (of foul and surface water network and treatment capacities) can be provided in advance by Southern Water and WSCC as appropriate and regularly updated by Southern Water and WSCC in much the same way that headroom capacity information is provided for the wastewater treatment works.

Officer Response

Comments noted. Information regarding surface water drainage and wastewater drainage is not assessed in the same way as for wastewater treatment works but information is available with regard SuDS and planning applications. No proposed amendment.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD40
Response Date	19/04/16 17:51
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

Paragraph 12.1 - This statement is well intentioned but are there any reasons why the wording is not stronger. The wording at the beginning of the document in Section 3 is strong and clear, but the use here of wording such as '*is encouraged*' has very little 'weight'.

For example, something like *... new development must ensure that the drainage or run-off from the development does not result in any deterioration in the capacity of existing sewer or drainage networks or systems in the areas adjacent to or downstream of the development and does not increase the probability or risk of flooding to these areas*, would be more appropriate.

Officer Response

The Surface Water and Drainage SPD sets out in paragraphs 2.3-2.5 how the document will be used, it cannot set policy, however, Policy 42 Flood Risk and Water Management of the adopted Chichester Local Plan sets out specific requirements, for example the third paragraph - "All development will be required to ensure that, as a minimum, there is no net increase in surface water run-off". No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD41
Response Date	19/04/16 17:51
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.7

Please provide comments and/or amendments.

Paragraph 12.4 - This is written particularly for 'soakage structures', but as we are potentially seeing at the Drift Road development, a 'swale' or flood holding pond is also going to be used as a soakage structure (although it may not strictly speaking be 'a structure').

If swales or holding ponds are going to be used for this purpose (such that drainage is into the ground, rather than into pipes or ditches etc), then these same 'rules' should apply – to ensure that there is adequate capacity in the swale or holding pond at all times – to receive the above volumes for the 1 in 10 and 1 in 100 year flows as described above.

Officer Response

Add after the third sentence: " **Soakaways should drain half of their volume within 24 hours for subsequent storm events.**"

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD42
Response Date	19/04/16 17:51
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

Paragraph 12.5 - Not just 'include', but the design should clearly demonstrate that the SuDS or soakaway has been designed in accordance with Best Practice (eg CIRIA SuDs Manual C753).

Officer Response

Comments noted. Chichester District Council and West Sussex County Council, as the Lead Local Flood Authority, would be consulted as part of the planning application process, this would ensure that any SuDS or soakaway proposal would be adequate and fit for purpose. No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD43
Response Date	19/04/16 17:51
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.9

Please provide comments and/or amendments.

Paragraph 12.10 - SuDs tend to be 'soft' (swales, ponds etc) rather than 'hard' engineering solutions, and the long-term risks for maintenance may be much higher than would be expected for 'hard' structures such as tanks or pipes etc. For example, soakaways are likely to become 'blinded' with silt or fine particles, and cleaning / repairs / replacements may be needed more often, and may be more expensive.

In addition to or as part of demonstrating the future management, funding and maintenance or the entire scheme, details should include for a risk register which identifies the probabilities and consequences of full or partial failure of each part of the system, together with costs for repairs and replacement.

Officer Response

Comments noted. Paragraph 153 of the National Planning Policy Framework requires that 'SPDs should help applicants or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.' Paragraph 193 requires that 'Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.' The requirement set out in the Drainage Impact Assessment is considered adequate and appropriate. No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD44
Response Date	19/04/16 17:51
Consultation Point	13 Water Efficiency (View)
Status	Processed
Submission Type	Email
Version	0.5

Please provide comments and/or amendments.

'Plastic' is a very inadequate description, which can range from cheap PVC pipes which may have thin walls, and potentially be brittle with low fracture toughness, and may also have poorly designed joints, subject to leakage or infiltration - up to much better medium density or high density polyethylene pipes – as used by Water and Gas Companies for their networks.

As a more general point, the way that this section is written does not specifically cover two issues which may be important in the context of flooding:

The first is an acceptance in 13.1 of an allowance of 5 litres of water per person per day for external water use. This is an excellent aspiration, but is not controlled in any way other than metering by the Water Company. People who uses much more than this will have to pay, but the costs per litre are low and any large volumes (eg for car washing) will become surface water run-off and should be allowed for in drainage assessments as being greater than 5 litres per person per day

The second is the design and construction of water and drainage networks to properties – both of which may leak, particularly if the materials or methods of construction are not adequate. The specification of materials and methods of construction should be rigidly controlled to meet Best Practice standards, to ensure that water is not 'lost' from these systems – to become either surface water run-off or discharges into ground water.

Officer Response

The standards are set out in Government Building Regulations (2010). As suggested by Southern Water, amend Box on page 19 as follows: We would recommend that in designing your developments you consider the use of plastic pipes **or similar material along with secure joints** for any foul and

surface water drains or sewer connecting in to the public foul sewer **to prevent the ingress of ground water or land drainage into the public sewer .**

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD45
Response Date	19/04/16 17:51
Consultation Point	15 Appendix 2 – Drainage Impact Assessment (View)
Status	Processed
Submission Type	Email
Version	0.8

Please provide comments and/or amendments.

Should the first part of an Impact Assessment be to show that the developer has taken the trouble to (and is required to) find out about existing systems, especially in terms of their capacities. It would be good if this could take the form of:

Spare Capacity of existing systems**X

Additional flows / loading from new development.....Y

** for each 'system', ie waste water infrastructure, surface water / drainage infrastructure etc – the systems which are adjacent to the proposed development and downstream of the development – all the way through to the 'outfall' in each case (ie into the sea or into the wastewater treatment works or a pumping station)

The important issues which then come out of sections 1 and 2 will then be much more clear, when it has been established how significant the impact is likely to be In order to be able to understand the capacities of existing systems, CDC / STC should have updated records of the existing systems, based on up to date modelling for each system

Officer Response

Comments noted. Southern Water are consulted on planning applications and will comment on the drainage solution proposed. Enhancements to the system can be required as part of development depending on the scale. No amendment proposed.

Comment

Consultee	Mr Timothy C Kinross [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Mr Timothy C Kinross
Comment ID	SWDSPD46
Response Date	19/04/16 17:51
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Email
Version	0.12

Please provide comments and/or amendments.

Foul water drainage - there are firm plans to increase the capacity of the Tangmere works but no plans to increase the Apuldram works. Any development of the South side of Chichester is therefore impossible because there is no spare capacity at Apuldram. Bosham and Thornham Waste water Treatment Works have both been upgraded last year and have spare capacity but there is "no information" on the Sidlesham works which includes Selsey. CDC advise asking Southern Water for this information which is relevant to avoid foul water overflows following additional development and connection to main drainage such as is happening in Selsey right now.

It should be noted that CDC are not proposing ANY upgrading to the present, as they themselves admit, poor surface water drainage. This lack of action should be challenged in a major way. The whole of the Manhood peninsular is a risk of surface water flooding after storms such as the event of June 2012. Such storm events are quite possibly, even likely, to become more frequent. I have noticed how in a built up area of Florida (all of which can be characterized as flood plain) there is no flooding even after 4 inches of rain in a 2 hour period because the drainage ditches are deep, wide and plenty of them.

Again there is no action plan to "de-culvert" existing poorly designed culverts. The EA are aware of the need for this but run scared at the thought of dealing with existing landowners who, for example, may have replaced a bridge over the ditch at their driveway entrance with a 9 inch culvert pipe. Even a 24 inch culvert becomes clogged with time and requires maintenance. It was a major cause of the flooding of people's houses in Almodington but it has been noted by FLAGS with dismay that the primary reason for not culverting is to avoid "loss of habitat". The EA have powers to enforce culvert and ditch clearance but are reluctant to use them. This needs to be vigorously challenged. There has to be a more humane balance struck between "habitat" for animals and flooding of peoples houses.

The SPD sensibly seeks to control and limit the possibility for new development causing sewage overflows or surface water drainage flooding but has nothing to say about solving existing problems.

Officer Response

Table 2 - Other WwTW in the Local Plan Area, of the Surface Water and Drainage SPD sets out the estimated remaining headroom for Sidlesham wastewater treatment works. Apuldram wastewater treatment works is currently operating at Best Available Technology (refer to paragraph 16.6).

The issues raised in this consultation response are relating to concerns and issues outside of the remit of this document and even the remit of the District Council. Issues relating to the maintenance of Main Rivers (such as the concerns highlighted) should be raised with the relevant team within the Environment Agency.

Paragraph 4.1 acknowledges the importance of there being sufficient infrastructure to accommodate development, however, new development is only expected to address its own impact on existing infrastructure and not address existing deficits. No amendment proposed.

Comment

Consultee	Mrs Beverley Weddell [REDACTED]
Email Address	clerk@plaistowandifold.org.uk
Company / Organisation	Plaistow And Ifold Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Plaistow And Ifold Parish Council (Mrs Beverley Weddell)
Comment ID	SWDSPD47
Response Date	21/04/16 11:48
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Web
Version	0.4
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

Plaistow and Ifold Parish Council has particular concerns regarding the area of Ifold, where the foul drainage system is at capacity. Many residents in Ifold are unable to flush ground floor lavatories during periods of heavy rain and have experienced problems with foul water backing up into their properties. There has been a great deal of windfall development in Ifold in recent years, with back garden development creating additional dwellings in small numbers. There is currently planning permission for c. 20 dwellings, which have yet to be built. The cumulative effect of these small developments is not being taken into account.

During periods of heavy rainfall, some properties in Ifold have experienced surface water flooding, particularly in Winter 2013. Survey walking of ditches and water courses within the settlement of Ifold is required to identify areas of failure and future improvement to reduce/prevent reoccurrence of flood issues. The parish council is prepared to work with the authorities on this matter and should be combined with the problems of foul water drainage identified above.

Officer Response

Comments are noted. All net new dwellings are included in estimating the remaining headroom as set out in the Tables that accompany the Surface Water and Drainage SPD. No amendment proposed.

Comment

Consultee	Mrs Beverley Weddell [REDACTED]
Email Address	clerk@plaistowandifold.org.uk
Company / Organisation	Plaistow And Ifold Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Plaistow And Ifold Parish Council (Mrs Beverley Weddell)
Comment ID	SWDSPD48
Response Date	21/04/16 11:49
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.6
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

In Ifold, where the foul drainage network is already over capacity, serious consideration must be given to the ability of the system to accommodate new developments. This must apply to developments of all sizes from one additional dwelling upwards, in order that the cumulative effect of small developments are taken into account. Plaistow and Ifold Parish Council does not consider it appropriate that these issues are dealt with by conditions, rather than no planning permission should be granted until a satisfactory method of drainage, which will not increase the flooding problems already experienced by residents, can be found.

Officer Response

Comments are noted. All net new dwellings are included in estimating the remaining headroom as set out in the Tables that accompany the Surface Water and Drainage SPD. No amendment proposed.

Comment

Consultee	Mrs Beverley Weddell [REDACTED]
Email Address	clerk@plaistowandifold.org.uk
Company / Organisation	Plaistow And Ifold Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Plaistow And Ifold Parish Council (Mrs Beverley Weddell)
Comment ID	SWDSPD49
Response Date	21/04/16 11:49
Consultation Point	Box 3 (View)
Status	Processed
Submission Type	Web
Version	0.9
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

Plaistow and Ifold Parish Council has concerns that planning conditions are not adequately enforced. Therefore, as stated earlier, the parish council considers that the provision of additional capacity and mitigation measures are agreed with Southern Water prior to any planning permission being granted.

Officer Response

Comments are noted. As explained in Flowchart 1, Southern Water or the relevant service provider can supply a capacity check with regard to connection to the public foul sewer network. Options can be discussed with Southern Water if there is insufficient capacity in the public sewer network. This information will need to be submitted by the applicant with the planning application. Box 3 (section 8) expands on this further. If a breach of a planning condition is reported to the District Council, then investigation of the breach is undertaken and enforcement action considered. No amendment proposed.

Comment

Consultee	Mrs Beverley Weddell [REDACTED]
Email Address	clerk@plaistowandifold.org.uk
Company / Organisation	Plaistow And Ifold Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Plaistow And Ifold Parish Council (Mrs Beverley Weddell)
Comment ID	SWDSPD50
Response Date	21/04/16 11:49
Consultation Point	10 Other Catchments (View)
Status	Processed
Submission Type	Web
Version	0.14
Is the document clear and understandable?	Yes


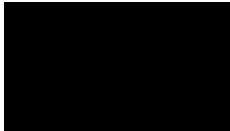
Please provide comments and/or amendments.

Paragraph 10.5 - it should be noted that there is no capacity in the Loxwood catchment.

Officer Response

Table 2 - Other WwTW in the Local Plan Area, of the Surface Water and Drainage SPD indicates that there is an estimated remaining headroom available at the Loxwood wastewater treatment works of 55. As explained in Flowchart 1, Southern Water or the relevant service provider can supply a capacity check with regard to the public foul sewer network. Box 3 (section 8) expands on this further. Existing problems with sewerage network capacity should be addressed to Southern Water as the statutory undertaker responsible. This document can only deal with how local plan policies are applied in relation to new development. No amendment proposed.

Comment

Consultee	Mrs Beverley Weddell 
Email Address	clerk@plaistowandifold.org.uk
Company / Organisation	Plaistow And Ifold Parish Council
Address	
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Plaistow And Ifold Parish Council (Mrs Beverley Weddell)
Comment ID	SWDSPD51
Response Date	21/04/16 11:50
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Web
Version	0.5
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

12.6 Plaistow and Ifold Parish Council considers that all residential developments in the parish, not just those in excess of five properties, should require ground water monitoring to be carried out prior to application, as Ifold has already suffered from the cumulative effect of small developments.

Officer Response

Comments noted. Paragraph 12.6 of the Surface Water and Drainage SPD also requires that smaller development undertake monitoring, however, the period for this is subject to agreement with Chichester District Council. No amendment proposed.

Comment

Consultee	Mrs Laura Lax [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Environment Agency
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Environment Agency (Mrs Laura Lax)
Comment ID	SWDSPD52
Response Date	21/04/16 12:59
Consultation Point	15 Appendix 2 – Drainage Impact Assessment (View)
Status	Processed
Submission Type	Web
Version	0.6
Is the document clear and understandable?	Yes
Is there anything further that should be included?	Yes

Please provide comments and/or amendments.

The only addition that we would suggest to the document is to introduce a caveat at the bottom of the drainage impact assessment form in Appendix 2.

We would suggest wording along the lines of "I hereby confirm that I have completed this form to the best of my knowledge. Any facts, plans or drawings and/or additional information is true and accurate".

This would ensure that the information provided for decision making is accurate and the most informed decision can be made.

Officer Response

Add additional text to the Applicants details table as follows: **"I hereby confirm that I have completed this form to the best of my knowledge. Any facts, plans or drawings and/or additional information is true and accurate"**.

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Portsmouth Water Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Portsmouth Water Ltd (Mr Paul Sansby)
Comment ID	SWDSPD53
Response Date	21/04/16 08:05
Consultation Point	13 Water Efficiency (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

The Government withdrew the Code for Sustainable Homes because it could produce perverse outcomes in terms of water use. In Chichester homes were built with rainwater harvesting, to meet the highest code standard, and this resulted in a greater discharge to the sewerage system. This was contrary to the policy to limit the volume of sewage draining to Apuldram Sewage Treatment Works. The Council has included the 110 litre standard in the Local Plan and this will produce more water efficient homes. It is not up to the Council to encourage developers to work to higher standards and this section should be removed. If it is not then there may be higher flows to the works or developers may use less sustainable sewage treatment processes.

Officer Response

Comments noted. Policy 12 Water Management in the Apuldram Wastewater Treatment Catchment of the adopted Chichester Local Plan requires that no surface water from new development shall be discharged to the public foul or combined sewer system. The overall aim of the Surface Water and Drainage SPD is to reduce the total Nitrogen being discharged in to the Harbour and for applicants to demonstrate "no net increase" in flows to the Apuldram WwTW. Paragraph 13.4 encourages developers who voluntarily choose to build more water efficient homes. It is not for the Council to discourage this as it is contrary to the concept of sustainable development in the longer term. Any changes to existing policy would need to be undertaken through the review of the adopted Chichester Local Plan. No amendment proposed.

Comment

Consultee	Mrs Laura Lax [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Environment Agency
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Environment Agency (Mrs Laura Lax)
Comment ID	SWDSPD54
Response Date	21/04/16 13:01
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Web
Version	0.4
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

We welcome the creation of this SPD. The Environment Agency have worked closely with Chichester District Council in the production of this document and fully support the content.

We think that by having this SPD to expand on and help implementation of the objectives and policies in the adopted Chichester Local Plan. This should give consistency of approach to the surface water and drainage issues in the district.

It will help ensure the protection of the special environment that Chichester is known for whilst formalising the considerations that need to be made when development is proposed.

We are pleased that the information contained will provide useful advice to developers and consultants in the preparation of planning applications to ensure that development fully considers the water environment and how it should be managed.

Our role is both as an environmental regulator and as a consultee in the planning system helping to deliver sustainable development and improve environmental quality. As an advisor and consultee to Chichester District Council we are happy to support them in implementation of the SPD and the scenarios within it.

We are also committed to continuing to work with Chichester District Council, Southern Water and other parties to move forwards finding sustainable solutions.

Is this approach appropriate? Yes

Is there anything further that should be included? No

Officer Response

Support is welcomed and comments are noted. No amendment proposed.

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Portsmouth Water Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Portsmouth Water Ltd (Mr Paul Sansby)
Comment ID	SWDSPD55
Response Date	21/04/16 08:05
Consultation Point	8 Box 3 (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

Reference in paragraph 3 to; "These could include removal of surface water that currently drains to a combined sewerage system ..." Developers need to be reminded that in SPZ1, 1c, 2 1 and within 500m of a public water supply source the use of infiltration drainage as an alternative is unlikely to be appropriate. Therefore where a site is in an SPZ and an area which has a sewage capacity constraint there may not be an alternative solution unless the water can be directed to a nearby watercourse.

Officer Response

Concerns are noted. Box 3 specifically relates to the Wastewater Treatment Works listed on page 15 of the document. According to the Environment Agency Groundwater SPZ mapping, there are no SPZ1, 1c, 2 in these areas. No amendment proposed.

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Portsmouth Water Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Portsmouth Water Ltd (Mr Paul Sansby)
Comment ID	SWDSPD56
Response Date	21/04/16 08:05
Consultation Point	4 Wastewater Treatment Infrastructure (View)
Status	Processed
Submission Type	Email
Version	0.11

Please provide comments and/or amendments.

Paragraph 4.3 recognises that waste water infrastructure maybe constrained by a range of environmental factors, neither groundwater risk or SPZs are specifically mentioned. I would be concerned that constraints in sewer capacity described in the document may lead developers to put forward inappropriate solutions involving drainage to ground, that do not take account of the risks to groundwater and the public water supply. For example; it is important to recognise that the use of borehole waste disposal systems will not be appropriate in SPZ 1, 1c 2 and 3 2 . Development should not be permitted unless another option for waste disposal has been identified that does not put groundwater and the public supply at risk.

Note 2: It will not be appropriate to discharge waste to groundwater within an SPZ 3 catchment area where related pollutants already occur within the groundwater at the associated abstraction point above the relevant Water Framework Directive Criteria. For example, nitrates already exceed the WFD criteria in a number of the public water supply catchments in the CDC area.

Officer Response

Concerns are noted. The Environment Agency would be consulted as part of the planning application on any potentially contaminating development located in Source Protection Zones. The list of environmental factors is not exhaustive and all relevant factors would be considered. Development is expected to connect to an existing wastewater treatment works, if an alternative on-site solution is proposed, the Environment Agency would need to grant the relevant permit. No amendment proposed.

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Portsmouth Water Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Portsmouth Water Ltd (Mr Paul Sansby)
Comment ID	SWDSPD57
Response Date	21/04/16 08:05
Consultation Point	5 Flow Charts (View)
Status	Processed
Submission Type	Email
Version	0.8

Please provide comments and/or amendments.

Flow chart 2 ends with the option to install an alternative foul drainage solution. Alternative drainage solutions that involve discharge to ground can result in pollution of groundwater and public water supplies. For example; nitrates, microbiological, cleaning products. This needs to be emphasised and taken in to account as a material planning consideration.

Officer Response

The final option enables the developer to engage with the Environment Agency and Chichester District Council to discuss available options for alternative foul drainage. Section 11 of the Surface Water and Drainage SPD sets out the requirements for non-mains drainage. Paragraph 11.3 highlights the need for the discharge of treated sewage effluent to either surface water or groundwater to either be registered as an exempt discharge activity or require a permit from the Environment Agency. Paragraph 11.4 states that the environmental acceptability of the discharge on the receiving waters will also be fully determined. No amendment proposed.

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Portsmouth Water Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Portsmouth Water Ltd (Mr Paul Sansby)
Comment ID	SWDSPD58
Response Date	21/04/16 08:05
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.10

Please provide comments and/or amendments.

In SPZ1, 1c and 2 1 the hierarchy for SUDs referred to in Section 12.3 should be reversed. Infiltration drainage should not be the preferred surface water drainage solution. The national guidance does clarify that infiltration drainage will not be appropriate where there is a risk to groundwater. Instead the developer should investigate and develop a SUDs solution based on above ground drainage. The use of permeable paving in road and car park design is unlikely to be appropriate if it drains directly in to the ground 1 . Any in ground storage / attenuation tanks should be impermeable and discharge there drainage to a lined swale, existing water course or sewer, with appropriate pollution control measures.

Note 1: Unless it can be demonstrated in SPZ2 that the ground water is deep enough in all seasons that there is no significant risk to the public water supply.

Any proposed surface water drainage solution within SPZ 1, 1c, 2, or within 500m of a public water supply abstraction point will require submission of scheme details to the LPA to demonstrate that;

- 1 Robust pollution control measures will be provided, and
- 2 Details of how the scheme will be maintained and monitored in the long-term, including the pollution control measures. For example; who will be responsible for monitoring and emptying interceptors located to collect drainage from road and carpark areas? (*Note: Section 12.10 of the SPG does make a reference to a need to demonstrate future management funding and maintenance of the entire scheme, but no where is the need for pollution protection measures and their maintenance specifically mentioned*).

Where a development is located within SPZ 1, 1c, 2, or within 500m of a public water supply source and poses a risk to the public drinking water supply, Portsmouth Water will request planning conditions requiring submission and approval of a surface water drainage scheme before development commences. The LPA should consult both Portsmouth Water and the EA before discharging the condition.

Section 12.3 and 12.4 of the SPG needs to highlight that infiltration drainage can not be considered where the aquifer is confined, as there will be no capacity in the aquifer to store additional water. The developer will need to demonstrate the aquifer is not confined before an infiltration solution can be considered. Hence there is a need for groundwater monitoring data as described in section 12.5. However, the text in section 12.6 which indicated that ground water monitoring will need to be carried out between October and March inclusive prior to application is not robust. Such monitoring will not always provide meaningful data in a dry winter when ground water levels remain low, especially in a geological setting when the aquifer is seasonally confined. Relying on inadequate monitoring data taken over one dry winter may result in the installation of a surface water drainage solution that does not work during all years, as there is no space in the aquifer during wetter winters for the water to go in to, resulting in groundwater flooding.

This infiltration drainage assessment should include:

- a) The presence of constraints that must be considered prior to planning infiltration SuDS;
- b) The drainage potential of the ground;
- c) Potential for ground instability when water is infiltrated;
- d) Potential for deterioration in groundwater quality as a result of infiltration.

Evidence of infiltration tests, particularly at the location of any intended infiltration device, and groundwater level monitoring is also required.

If solution features are present development layouts will need to be adjusted to take account of their presence. For example; a 10m radius building exclusion zone is recommended around solution features. Surface water and foul drainage must be directed away from solution features.

Where the Chalk is overlain by Clay, and thus the appropriate levels of infiltration cannot be achieved, Portsmouth Water has had experience of developers installing, or intending to install, deep borehole infiltration systems. These systems by-pass any natural attenuation to pollution and turbidity risks afforded by the Chalk. Portsmouth Water would be minded to object to any planning applications where the use of deep bore infiltration systems were proposed within Source Protection Zone 1, 1c and 2, or where this is proposed within 500m of a Portsmouth Water source.

Section 12.10 of the SPG should emphasise that any SUDs system needs to be designed with pollution control measures to protect both surface water and groundwater quality.

Officer Response

Concerns are noted. West Sussex County Council, as the Lead Local Flood Authority, would be consulted with regard to surface water drainage and the Environment Agency would be consulted as part of the planning application on any potentially contaminating development located in Source Protection Zones. The Surface Water and Drainage SPD is concerned with specific issues relating to delivering development in the Local Plan Area. It does not set policy but offers guidance on implementation of policies in the adopted Chichester Local Plan. These concerns will be considered in the review of the Local Plan. Add after the second sentence in paragraph 12.3 " .. an infiltration device (e.g...). **Consideration of the suitability of these features should include demonstrating that infiltration will not pose a risk to groundwater quality.** If this is not achievable then ...".

Comment

Consultee	Mr Paul Sansby [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Portsmouth Water Ltd
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Portsmouth Water Ltd (Mr Paul Sansby)
Comment ID	SWDSPD59
Response Date	21/04/16 08:05
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.4

Please provide comments and/or amendments.

The document is currently very focused on how developers should overcome constraints in relation to waste water drainage. While I understand that this is a critical issue for Chichester District Council, and a material planning condition, additional focus does need to be given to the protection of groundwater. Both waste water and surface water drainage can pose a significant risk to groundwater and the public drinking water supply and more detail needs to be provided on the risks and constraints.

Section 3 of the SPG provides background information but does not mention;

- The importance of groundwater in the CDC area. - That all of the drinking water supplied by Portsmouth Water in the CDC area comes from groundwater. - That protecting groundwater and public drinking water supplies is a material planning consideration (NPPF). - The presence of confined aquifers and Source Protection Zones will limit where it is appropriate to utilise infiltration drainage systems.

These points need to be included in the SPD.

All of the drinking water supplies within the Chichester District Council area supplied by Portsmouth Water are obtained from the Chalk aquifer that makes up the South Downs. The discharge of surface water via the use of SUDs systems within Source Protection Zone 1 and Source Protection Zone 2 poses a potentially significant risk to groundwater water quality. There is a risk of diffuse pollution into groundwater by hydrocarbons, metals and pesticides, even from residential developments (See photograph 1 & 2). Portsmouth Water believe that the potential risks from development to groundwater (including the public drinking water supply) and the presence of Source Protection Zones (SPZ's) should be specifically mentioned within the main body of the SPD and also contained within the Glossary

of Terms. Source Protection Zones are Environment Agency delineated zones that were set up to protect groundwater quality. Further information can be found at: <http://apps.environment-agency.gov.uk/wiyby/37833.aspx> . The Council should consider including a map in the SPG illustrating where the SPZ's are within the Chichester District Council area.

The nature of the Chalk aquifer will allow for some natural attenuation of minor contaminants where groundwater occurs at depth. However, where the groundwater is closer to the surface (which can change with the seasons), or where rapid flow paths exist (such as solution features) within the Chalk, the risk from pollution and turbidity incidents will be greater. Where there is a risk of solution features such as swallow holes or sinks the developer should undertake a comprehensive site investigation, including a geophysical survey, to identify any potential karstic features within the Chalk that could act as a rapid flow path to groundwater abstractions used for public water supply. Where karstic features are identified alternative means of surface water disposal which do not involve infiltration drainage should be investigated. **There should be consultation with Portsmouth Water regarding the approval of any SUDs systems within SPZ1, 1c, 2 and within 500m of any public water supply abstraction point.**

Officer Response

Concerns are noted. The Surface Water and Drainage SPD is concerned with specific issues relating to delivering development in the Local Plan Area. It does not set policy but offers guidance on implementation of policies in the adopted Chichester Local Plan. These concerns will be considered in the review of the Local Plan. No amendment proposed.

Comment

Consultee	Ms Catherine Tonge [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Natural England
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Natural England (Ms Catherine Tonge)
Comment ID	SWDSPD60
Response Date	21/04/16 09:06
Consultation Point	11 Non-mains drainage (View)
Status	Processed
Submission Type	Email
Version	0.7

Please provide comments and/or amendments.

We support the position that non-mains drainage be considered a last resort, as outlined in 11.1 – 11.5 (p16). It may also be useful to reference the need to comply with the general binding rules for small sewage discharges as outlined on Gov.uk [here](#) .

Further guidance on what people need to do if they have a septic tank or treatment plant is available [here](#) .

The SPD should stress the need to comply with the rules by maintaining septic tanks and sewage treatment plants properly, and in perpetuity, and by ensuring they do not cause pollution.

Officer Response

Add additional paragraph 11.6 as follows "**Applications for non-mains drainage need to comply with the binding rules by maintaining septic tanks and sewage treatment plants properly, and in perpetuity, and by ensuring they do not cause pollution. Further information can be found in Section 17.**"

Add the following to Section 17 Links and Further Guidance **General binding rules for small sewage discharges in England**

-<https://www.gov.uk/government/publications/small-sewage-discharges-in-england-general-binding-rules>

Add the following to Section 17 Links and Further Guidance **Septic tanks and treatment plants: permits and general binding rules** - <https://www.gov.uk/permits-you-need-for-septic-tanks>

Comment

Consultee	Ms Catherine Tonge [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Natural England
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Natural England (Ms Catherine Tonge)
Comment ID	SWDSPD61
Response Date	21/04/16 09:06
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.5

Please provide comments and/or amendments.

We recognise that these measures are aimed at protecting the water quality of the AONB/SPA/SAC/SSSI/Ramsar Site in the harbour. As poor water quality is the main reason for unfavourable condition and is affecting the amenity value of the landscape, we welcome the objectives of sustainable drainage and waste water management.

Officer Response

Support is welcomed and comments are noted. No amendment proposed.

Comment

Agent	Miss Claire Lindsay [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED]
Consultee	Mr Luke Challenger [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Nexus Planning
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Nexus Planning (Mr Luke Challenger)
Comment ID	SWDSPD62
Response Date	21/04/16 15:38
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Web
Version	0.5

Please provide comments and/or amendments.

Please see comments set out in box for any additional comments and / or amendments.

Please provide comments and/or amendments.

Please see comments set out in box for any additional comments and / or amendments.

Is there anything further that should be included? Yes

Please provide comments and/or amendments.

Please see comments set out in box for any additional comments and / or amendments.

Please provide any additional comments and/or amendments.

Our representation is made in relation to paragraph 12.6, which states:

"Residential developments in excess of five properties will require ground water monitoring to be carried out between October and March inclusive, prior to application. The extent of monitoring required for smaller developments will be subject to agreement with the Council's Engineers".

We propose the following amendments to paragraph 12.6 as set out in **bold**:

*"Residential developments in excess of five properties will require ground water monitoring to be carried out between October and March inclusive **where they employ an infiltration solution, prior to construction of any surface water drainage system**. The extent of monitoring required for smaller developments will be subject to agreement with the Council's Engineers."*

It is considered that the current wording to require monitoring to be undertaken prior to submission of an application is unduly onerous and not necessary. The proposed change above would therefore ensure the SPD is consistent with paragraph 153 of the NPPF which, states:

"supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development."

Officer Response

Comments noted. Amend the first sentence of paragraph 12.6 as follows: "... October and March inclusive, prior to **construction** application .The extent of .."

Comment

Consultee	Mr Steve Lawrence [REDACTED]
Email Address	planning@conservancy.co.uk
Company / Organisation	Chichester Harbour Conservancy
Address	The Harbour Office Itchenor Chichester PO20 7AW
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Chichester Harbour Conservancy (Mr Steve Lawrence)
Comment ID	SWDSPD63
Response Date	21/04/16 14:32
Consultation Point	Box 1 (View)
Status	Processed
Submission Type	Email
Version	0.10
Is the document clear and understandable?	Yes

Please provide comments and/or amendments.

Thank you for consulting Chichester Harbour Conservancy on the subject consultation. Sewage treatment for properties in the Chichester area is very complex so I have provided some background information, along with our response and concerns.

Background Chichester Harbour is an Area of Outstanding Natural Beauty (AONB) and is protected by several national and international designations. It is a Special Area of Conservation (SAC), a Special Protection Area (SPA), a Site of Special Scientific Interest (SSSI) and a Ramsar site.

All of these designations include protection for either the mudflats and intertidal areas, or for waders and waterfowl - 55,000 waders and wildfowl come to the Harbour each year and they rely on these protected areas for food. 3 species are present in internationally significant numbers and 10 species are present in nationally significant numbers.

Chichester Harbour is currently classed as 'moderate' under the Water Framework Directive (WFD) due to excessive macro-algal weed growth – this affects vital feeding areas and needs to be addressed. Therefore, nitrate discharges into the Harbour must be reduced in order for water quality to improve and weed growth to return to acceptable levels.

Weed growth can affect mud-dwelling invertebrates - especially those that filter feed, such as bivalves, and can also affect *Hydrobia* (a Gastropod) which is an important food source for many waders and some wildfowl, such as Shelduck.

It also prevents sight-feeding waders, such as Curlew and Grey Plover from finding burrow entrances made by worms and siphon holes made by bivalves and inhibits sieving by Teal, as they search for seeds within the mud's surface.

A proportion of the historic weed growth was due to nitrate from the Chichester Waste Water Treatment Works (WwTW) at Apuldram. Recent investment at this site means that nitrate is now treated to a much lower level, but there is still an ongoing nitrate issue from storm discharges via the combined sewer outfall. Between 1 April 2012 and 31 March 2013 the storm discharge at Apuldram was recorded as storming for the equivalent of 175 days.

Following pressure to address this, the storm discharge was fitted with UV treatment in 2014 and this has improved water quality but only for levels of bacteria and E- coli. Nitrate in the discharge is not treated and high levels continue to enter the Harbour in storm conditions.

Due to the ongoing problems mentioned above, the Chichester WwTW's environmental permit is very strict and overall treatment capacity has been limited to allow for the nitrate issue. With the addition of the UV treatment of the storm discharge the Environment Agency reassessed the headroom and concluded that 700 extra houses could be connected to Apuldram. However, it is recognised by the Environment Agency and Natural England that under current catchment conditions, any further connections beyond this headroom would have a significant impact on the nitrate loads and weed growth in the harbour.

Is this approach appropriate?

No

Please provide comments and/or amendments.

Chichester Harbour Conservancy judge that overall this SPD is a useful document, but given the hypereutrophic conditions in Chichester Harbour there should be no net increase in nitrate load to the harbour while it fails to meet the standards of good ecological condition required by the Water Framework Directive.

We are concerned that that the criteria used within the document for assessing new connections to Apuldram is judged against demonstrating 'no net increase in flows'. In these circumstances, the clean rainwater that may have previously entered a combined sewer could be replaced by sewage with consequent negative impacts on the harbour. An increase in nitrate load is not acceptable to Chichester Harbour Conservancy.

It is our recommendation that the criteria for developments in the Apuldram WwTW catchment should be changed to, '**no net increase in flows, and no net increase in nitrates**'.

Officer Response

Concerns are noted. Apuldram Wastewater Treatment Works operates to a strict Nitrogen removal standard which is regulated by the Environment Agency through Southern Water's permit. All "flows" to the works are treated to the same standard whatever the elements, therefore replacement of rainwater with sewage should not increase the nitrogen discharge from the works. The storm flow is predominantly groundwater with a small element of sewage, the small increase in concentration from a single development once diluted with groundwater (which has high levels of nitrogen) is negligible. A pragmatic approach has been adopted, therefore no amendment proposed.

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	parishclerk@sidlesham.org
Company / Organisation	Sidlesham Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Sidlesham Parish Council (Parish Clerk)
Comment ID	SWDSPD64
Response Date	22/04/16 16:31
Consultation Point	10 Other Catchments (View)
Status	Processed
Submission Type	Email
Version	0.18

Please provide comments and/or amendments.

A stated aim of the document is to ensure the quality of the water environment does not deteriorate. Currently, on a regular basis untreated foul wastewater has to be pumped into the main river/ditches feeding into Pagham Harbour from the overloaded foul system.

This is due to the Southern Water (SW) foul system not being able to cope with periods of prolonged rainfall in winter months. This situation instead of being recognised and any worsening avoided is allowed to further deteriorate by allowing new connections the foul system.

Although the Sidlesham WwTW professes to have a percentage of capacity headroom the overall system fails to cope with flows. This may be attributable to the capacity of the connecting network in areas such as Sidlesham and Bracklesham/East Wittering and not the works itself but should be considered as part of the overall infrastructure position.

The above situation illustrates that there is insufficient detail in the document made to The Manhood and the Sidlesham WwTW. There should be as equal coverage and advice as that extended to that of other WwTW such as Appledram.

The scope of calculations on headroom capacity is often related to accommodating medium to large developments. However, the cumulative impact on small/windfall sites should also be a consideration as where capacities are limited such developments can quickly use up capacity.

Impact of horticultural glass houses on drainage Within the scope of the documents definition of "new development" new and replaced horticultural glass houses should be included. Whilst large scale glass house proposals have reservoirs for water collection and reuse systems, replacement glass and small scale new developments very often have no systems. In many instances these latter sites have

insufficient site area to accommodate a reservoir- all the site area being required to create an economically viable business unit.

As a result, water is often discharged in large quantities and very rapidly in periods of rainfall directly into local ditch systems and then this often finds its way through infiltration into the foul drainage system.

This has been evidenced by SW's own inundation studies where surges in flows following periods of rainfall have been identified. These surges have, however, not been in areas where residential property is primarily located but in those areas dominated by large areas of glass.

This issue should have specific coverage in the document and further reinforces the need for greater specific reference to The Manhood issues.

Officer Response

Concerns are noted. Southern Water are consulted as part of the planning application process to ensure there is adequate infrastructure to convey, manage, treat and discharge the wastewater. The Environment Agency is the regulating body who ensure that there is no breach by the Sewerage Undertaker of their operating permit. All net new dwellings are included in estimating the remaining headroom as set out in the Tables that accompany the Surface Water and Drainage SPD. The issues with infiltration is acknowledged in paragraph 3.4. Paragraph 4.1 acknowledges the importance of there being sufficient infrastructure to accommodate development, however, new development is only expected to address its own impact on existing infrastructure and not address existing deficits. Paragraph 12.1 states that built development can lead to increased surface water run-off. Built development includes glasshouses and employment. Amend paragraph 3.6 as follows "New **built** development can affect". Add the following text to the final sentence in paragraph 12.6 "monitoring required for **employment, horticulture and smaller residential** developments will be ..."

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	parishclerk@sidlesham.org
Company / Organisation	Sidlesham Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Sidlesham Parish Council (Parish Clerk)
Comment ID	SWDSPD65
Response Date	22/04/16 16:31
Consultation Point	12 Surface Water Drainage (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

There is an issue here as to the importance of drainage as an issue to refuse development.(i) Where the drainage scheme does not address the downstream implications of the proposed discharge.(ii) Reference to using soakaways as a means of drainage is of little practical application due to the persistent high water table over a large amount of the peninsula. Within the Peninsula the management of the ditch and rife system and its ongoing maintenance is a continual concern. A particular issue is where funding will be found and it may be that application of CIL funds may be an avenue to be pursued.

Within the peninsula measures such as structural tree planting to reduce ground water levels and "sacrificial" areas of agricultural land to absorb floodwater that could be rapidly drained without permeating into the ground may be measures to be considered.

Officer Response

Comments noted. Paragraph 3.5 of the Surface Water and Drainage SPD acknowledges that it is important to ensure that new development does not exacerbate existing problems and paragraph 12.5 requires monitoring of groundwater levels in support of the SuDS proposal. No amendment proposed.

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	parishclerk@sidlesham.org
Company / Organisation	Sidlesham Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Sidlesham Parish Council (Parish Clerk)
Comment ID	SWDSPD66
Response Date	22/04/16 16:31
Consultation Point	11 Non-mains drainage (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

Whilst onsite foul drainage present a very coherent and sustainable solution to drainage a concern is that housing development approved on the basis of onsite treatment and later changed by developer because of technical issues. The housing development has still however been allowed to proceed although when originally initiated if main drainage had been required the development would have been refused.

Officer Response

Comments are noted. As explained in paragraph 4.2 of the Surface Waer and Drainage SPD, development would be expected to connect to the nearest public foul sewer, non-mains drainage solutions may be considered where all other options have been exhausted (paragraph 11.2) No amendment proposed.

Comment

Consultee	Parish Clerk [REDACTED]
Email Address	parishclerk@sidlesham.org
Company / Organisation	Sidlesham Parish Council
Address	[REDACTED]
Event Name	Surface Water and Drainage Supplementary Planning Document
Comment by	Sidlesham Parish Council (Parish Clerk)
Comment ID	SWDSPD67
Response Date	22/04/16 16:31
Consultation Point	3 Background (View)
Status	Processed
Submission Type	Email
Version	0.6

Please provide comments and/or amendments.

Whilst it is noted the document excludes the area covered by South Downs National Park the impact of the downlands on the ground water within the immediate coastal plain to their south should be considered. An integrated approach to water attenuation and control measures should be actively pursued to reduce overall quantities of ground water and the rate of flow into the coastal ground strata.

Officer Response

Comments noted. The Surface Water and Drainage SPD excludes the geographic area of the South Downs National Park as this area has its own Local Planning Authority. The SPD acknowledges this in paragraph 3.1. The water environment is taken as a whole and integrated within the SPD rather than only that which is within the Local Plan Area. No amendment proposed.