

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 30 NOVEMBER 2021

REPORT

SUBJECT: Drainage and Wastewater Management Plan (DWMP) Consultation

REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader
DATE: November 2021
EXTN: x 37853
AREA: Planning

EXECUTIVE SUMMARY:

Southern Water are in the process of preparing the first Drainage and Wastewater Management Plan (DWMP) and have reached the early scoping consultation stage. A full formal public consultation on the DWMP will be undertaken in the summer 2022.

This report seeks agreement that the provisional comments summarised in this report (fully amplified in the officer provisional letter of response sent by the due deadline Appendix 1) and any other matters raised by members forms the basis for the Council's response to the documents published for consultation from 21st September to midnight on 26th October.

RECOMMENDATIONS:

That Planning Policy Committee:-

1. Agrees the comments set out in sections 1.7 and 1.8 of this report (including Appendix 1) together with any other matters raised by members, as the basis for Arun District Council's formal response to the consultation.

1. BACKGROUND:

- 1.1 South Water are in the process of creating their first Drainage and Wastewater Management Plan (DWMP). DWMPs are intended to be long term plans, spanning 25 years or more, that provide the opportunity to improve water quality and drainage systems and reduce flooding and pollution to their customers, communities, businesses, and environment.
- 1.2 As part of the consultation Southern Water have also published Planning Objectives, Risk Based Screening, Baseline Risk and Vulnerability Assessment (BRAVA), Problem characteristics, Option Development and Appraisal, Technical Summaries,

and a Sustainability Appraisal Scoping Report document on the web site alongside the DWMP document.

- 1.3 Arun District has 3 drainage systems that are included within the Arun and Western Streams catchment, i.e. Lidsey, Ford and Pagham. Officers attended workshops with Southern Water and other stakeholders on 28th and 30th September and then 19th October.
- 1.4 At this early stage, the comments and feedback are intended to allow Southern Water to scope their methodology and evidence to be applied to preparing the DWMP and responses were invited by 26 October 2021 (officers therefore, set out a provisional letter of response by the deadline). There will be another formal full public consultation in the summer 2022 on the Draft DWMP itself.

Comments

- 1.5 The production of these plans is supported by the Council, especially considering the number of current and emergent issues that have been associated with the 3 systems within Arun District including overlap with neighbouring authorities.
- 1.6 The summarised response below follows the same order of the topic questions asked by Southern Water (and fully amplified in the officers attached provisional response letter at Appendix 1 to this item).
- 1.7 For ease, the main points are summarised below, against the topic headings:-

Problem characteristics

- While there is comment on existing issues, there is little clarification on when these are scheduled to be dealt with. This needs to be clearer in the documents produced. Connected with this, the current information does not provide certainty over whether these issues such as flooding from combined surface water and foul sewer incapacity (affecting existing coastal properties in Littlehampton and Bognor Regis) including consented storm overflows to sea (affecting bathing water), are only a temporary issue or will prevail longer term;
- Groundwater is a significant issue across most of Arun District. Consequently, it is the varying susceptibility levels to flooding from this source that are especially pertinent, in particular, within Lidsey catchment due to the surface water run-off from the chalk spring line of the Downs hitting the impermeable clay barrier in around Lidsey, Barnham, Elmer and other villages;
- Officers are acutely aware of the issues connected to nutrients and the Environment Agency's (EA) call for water neutrality in neighbouring areas to protect sensitive habitats and eco systems (e.g Chichester Harbour and Arun Valley SPA). It is encouraging that this has been recognised and added to the planning objectives for those areas but the Council wishes to remind Southern Water that, although these areas are not within Arun's planning authority area, there are hydrological links to and from those designated sites (e.g. Arun Valley). Arun is also aware that the EA has yet to assess the state of Pagham Harbour SPA from this perspective. Arun does not therefore wish to be in a position where it is the only Council in the sub-region not able to demand higher drainage and foul sewer standards, simply due to its administrative area. Arun

urges that a more comprehensive and strategic approach is taken to this at the wider cross catchment level and guidance be issued to reflect this.

Option Development and Appraisal

- There is a need to ensure that modelling is using and based on the sea level rise, river flows and rainfall intensity allowances issued by the Environment Agency in July 2021;
- A consistent and co-ordinated methodology needs to be applied when calculating Dry Water Flows (DWF) based on a comprehensive database of known, planned and unplanned developments in order to determine corresponding headroom capacity for discharge consents. The methodology must look across authority boundaries to fully account for cumulative impacts. This is most pertinent to Pagham Harbour as the administrative boundary goes through the centre of the harbour, affecting access and monitoring;
- It is strongly urged that guidance is produced and strongly enforced for the design details of foul drainage in areas where the groundwater is high, to be a rigorous standard in order to prevent further infiltration. It is hoped that doing this would begin to address the existing problem characteristics in the Lidsey system;
- In terms of option development, it is recommended that consideration is given to the recommissioning of redundant assets e.g. for pumping, treatment or storm water storage and the scope those disused assets may offer for short to intermediate term solutions for the current and emergent problems;
- It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth locations and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This maybe especially pertinent to the Manhood Peninsula and coastal locations once the impact of climate change coastal flooding and any erosion is accounted for;
- The Council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for tidal and in particular, pumped water storage on an inter-catchment basis, including looking at both the South Downs National Park and the coastal plain, including river Arun given the urgency of the climate emergency;
- Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale, nature-based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

Investment Programme

- It is appreciated that there is not going to be one single solution to addressing wastewater infrastructure but rather a combination of measures will be needed however, the Council consider that the specific objectives of the DWMP for Arun

should be considered as a priority for investment within Arun District.

- There should be clear direction provided over the appropriate roles and actions to be taken by each party during the further DWMP work with respect to addressing the high groundwater level and susceptibility to groundwater flooding across Arun District;
- A clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others that also apply. The Council do not wish to be left as the only area not being able to apply high standards when all neighbouring areas are being required to do so. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible.

CONCLUSIONS

- 1.8 Arun District Council welcomes the opportunity to comment on the DWMP. This report sets out the Council's proposed response (amplified in the officers' provisional response letter Appendix 1) together with any further points member wish to make.

2. PROPOSAL(S):

That the Planning Policy Committee agrees the comments set out in paragraph 1.7 and 1.8 of the report as the basis for the Council's formal response to the DWMP consultation.

3. OPTIONS:

- 8.1 That the Planning Policy Committee:-
- a) agreed the response or
 - b) the response is not agreed.

4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		X
Relevant District Ward Councillors		X
Other groups/persons (please specify) Environment & Neighbourhoods (Engineers)	X	
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		X
Legal		X
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X

Sustainability	x	
Asset Management/Property/Land	x	
Technology		x
Other (please explain)		x

6. IMPLICATIONS:

This response will inform the progression of the DWMP, which should ultimately identify areas where investment should be focused for improvement of the drainage and wastewater network, which will help to secure existing and future property and assets from the risks of flooding arising from development and climate change.

7. REASON FOR THE DECISION:

The Council needs to respond to a public consultation by Southern Water to ensure that all concerns and issues connected with the sewerage, drainage and water supplies currently and in the future are accounted for and addressed in infrastructure planning needed for existing customers and future customers in Arun.

8. BACKGROUND PAPERS:

Background Paper 1: DWMP consultation
[Arun and Western Streams catchment DWMP \(southernwater.co.uk\)](https://www.southernwater.co.uk)

Appendix 1: Officer response letter

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e-mail: kevin.owen@arun.gov.uk

26th October 2021

Please ask for: Kevin Owen

Your Ref: "[Your Ref]"

Our Ref: DWMP Autumn 2021

Dear DWMP Team

RE: DWMP Consultation

Thank you for the opportunity to respond to the consultation on the Drainage and Wastewater Management Plan (DWMP). It is understood that this is intended to be the longer term strategic plan covering drainage, wastewater and environmental water quality and the comments that are provided in this letter are given in this vein.

Officers from the Council's planning policy and engineering teams attended workshops on 28 and 30th September and the 19th October, related to the 3 specific drainage catchments or systems within the District. It is hoped that the input made at these is captured along with this informal response letter in the further development of these plans (this letter is a provisional response subject to confirmation after 30 November). The letter addresses the issues in order of the consultation questions subject matter.

It is appreciated that the 14 planning objectives used are based on those set by Water UK, which were then supplemented i.e. Nutrient Neutrality, and it is appreciated that all 3 works within Arun District have been identified through the screening and BRAVA exercises to require improvements. However, the Council does have some concerns over the reasons behind these, as set out in this letter.

Problem characterisations

The most obvious point on this aspect is how little the existing issues are dealt with i.e. flooding and discharges at outfalls, including lack of urgency/clarity on when these are scheduled to be dealt with. The approach merely identifies the standards that have been set and consequently, the standard that will be applied. This does not explain the reasons or assumptions behind these to give any confidence that the specific issues will be resolved. An obvious example has been the recent discharges at the outfalls, from the Consented Storm Water Overflows in the Littlehampton area and why these were so significant. It is not obvious from the content of the existing documents to provide certainty that this was temporary and will not continue in the future. Repeated internal flooding of basements at properties along South Terrace, Littlehampton occurs but does not seem to have been picked up. The issue of impact on bathing water both at Bognor Regis and at Littlehampton is a current issue which was acknowledged in the workshops. The solutions or remedies are difficult because of the range of factors which impact – however, Arun District Council would urge that specific solutions be found in the short and intermediate term.

Groundwater is a significant issue for Arun District not fully explained by its topography, with only 3 small areas of the District not affected by this. Attention should therefore, be given to the relative variance of susceptibility of flooding from this source. For example, this variance is specifically known to be high across a large proportion of the area and significantly impacts the Lidsey area. The information relating to this can be seen within the Arun SFRA Update 2016 Appendix F¹. Due to this characteristic, it is not fully understood why planning objectives 4 and 7 (in the short term) have not been classed as very significant for all the systems within Arun District. The Lidsey system in particular has had long standing historical problems not just any that may be anticipated in the future. This is particularly relevant when inundation is so prominent in Arun resulting from the impact of the run-off from the chalk spring line (e.g. South Downs) onto the impermeable clay around Lidsey, Barnham, Elmer and other villages. More detailed discussion on the exact issues for this area can be found in the Lidsey SWMP and the associated ones around Elmer can be found in the Elmer SWMP.

Although not a currently a direct issue for any of the systems within Arun, officers are acutely aware of the emergent issues around nutrients and water neutrality that neighbours are facing. While it is encouraging that nutrient neutrality has been recognised and added to the planning objectives, Southern Water are reminded that there are designated sites (e.g. Arun Valley SPA), which partially overlap with the Arun District area which are hydrologically and cumulatively linked to the planning authority area. The Council is therefore, deeply concerned at being the only sub-regional area not to have the ability to demand the required water neutrality standards through planning decisions through default, purely based on the boundaries of the relevant catchment. Arun District Council would therefore, urge that a comprehensive coordinated and cumulative approach be applied to this topic in Arun going forward with policy solutions and recommendations.

Option Development and Appraisal

As was raised within the workshops, there is a need to ensure that the modelling and forecasting reflect the latest EA sea level projection, peak river flow and rainfall intensities at the relevant catchment and medium ranges, unless otherwise advised by the Agency.

The Council would wish to see a consistent and coordinated methodology applied across all systems and catchments to the establishment of development headroom within connected planning authority areas. This should clarify the impacts on and of Dry Water Flow calculations, using a comprehensive database of existing, planned and unplanned developments to establish headroom for discharge consents. It must be emphasised that this must go across local authority boundaries to fully account for the cumulative impacts of development. This is particularly important when focusing on Pagham Harbour where the authority boundaries cut through the middle of it and includes associated issues such as the location of water quality testing or access. To this extent, Arun officers would like to meet with you to discuss setting up a liaison meeting to refresh and update the previous Statement of Common Ground (2017)² – as Southern Water have similarly been coordinating with Chichester District Council and the Environment Agency.

Linked to this the Council wish for more guidance to be produced and strongly enforced (e.g. to ensure robust construction of foul drainage connections where the groundwater is high) to prevent future infiltration, which is a significant issue for a large proportion of Arun District as covered above. Additional to this, tide locking and high water levels will mean that certain solutions (e.g. extra storage via SUDs) may not always be appropriate in their present form or standard requiring other solutions or standards to be identified and proposed.

For overall development of options, it is recommended that to address some of the problem characteristics, consideration be given including the role of recommissioning redundant plant/equipment and infrastructure for pumping, treatment or storm storage and short to intermediate term remedies. It seems that there are assets that could potentially be reused in an active way to help towards some solutions.

¹ <https://www.arun.gov.uk/flood-risk-planning-policy>

² <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n15993.pdf&ver=16505>

It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This may be especially pertinent to the Manhood peninsula and/or coastal locations once the impact of climate change coastal flooding and any erosion is accounted for.

In particular, it is evident in Arun that a combination of ground water flooding susceptibility and tidal water tables limit the current scope of SUDs to attenuate flooding and surface /ground water infiltration in their current form. The council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for pumped water storage on a inter-catchment basis looking at the South Downs National Park and coastal plain including river Arun. Manmade water bodies, uphill in the Downs must be feasible option provided that sensitive landscape considerations are accommodated given the urgency of the climate emergency.

Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale – nature based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

Investment Programme

It is appreciated that there is not going to be one simple solution required but a combination throughout each, however the Council consider all of the objectives of the DWMP should be considered as a priority for investment within Arun District, as is detailed through the above points in addition to the existing designation of 'Improve' for each of the systems (Ford, Lidsey and Pagham) falling in the district.

As signalled under comments on the Option Development and Appraisal section above, the Council would wish more work to be done on responses to proposals for connection to the systems, along with guidance and specifically enforcement of high standards for design details to ensure robust construction of foul drainage in areas with high groundwater to prevent future infiltration. This can be achieved in short term through direction towards existing information that is available from West Sussex County Council (WSSCC) and the Districts and Boroughs. This could then be addressed more comprehensively through the creation of stand-alone or coordinated documents with WSSCC or respective authorities that can be used in determining applications as material considerations until entrained in Supplementary Planning Documents following plan making and testing at examination.

The issue of the high groundwater level and associated high susceptibility to groundwater flooding will be essential during the detailed work on solutions for those systems in Arun District. There should be clear direction provided over the appropriate roles and actions to be taken by each party.

Finally, a clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others also apply. The Council do not wish to be left as the only area not being able to apply high standards when all it's neighbours are being required to apply such. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible.

Overall in summary, Arun District feel that:

- there needs to be greater content on the existing issues and how and when these are to be dealt with;
- consistency in the methodology used (climate change allowances and DWF calculations);
- significantly greater enforcement of high design details for the robust construction of foul drainage in areas of high groundwater;
- possible recommissioning of redundant assets;

- identify where natural solutions would be expected to occur and engage with all needed in their development; and
- believe there should be investment in the production of standalone or coordinated guidance documents.

I would be grateful if you could contact me at kevin.owen@Arun.gov.uk or phone 07908919397 in order to coordinate possible meeting dates (for the purposes set out and underlined above under 'Option Development and Appraisal') week beginning 8 November.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'K Owen', written in a cursive style.

Kevin Owen (Team Leader Planning Policy & Conservation)