

Adur Floodwatch Group

Run by the community for the community

Mr. Chris Banks
C/O Banks Solutions
64 Lavinia Way
East Preston
West Sussex
BN16 1EF

Adur Local Plan Examination

19th December 2016

Dear Mr Banks,

Could I ask you to submit the following statement to Mr Hoggar as supplementary comment to this group's consultations to the Adur DC Plan, Policy 5, New Monks Farm allocation.

Questions 5.3, 13.4, 13.5 (re plan policies 35 & 36)

Since the last reg19 consultation we have learned that the developer of New Monks Farm may be intending to install a PTP package treatment plant(s) to service the management of foul waste for the proposed Policy 5 development of 600 homes, 10,000 sq m business development and a school.

The PTP 'cleaned' water flows would be drained into the existing ditch network.

Southern Water's foul waste only sewer system does not have the capacity for New Monks Farm foul waste output without a large investment in sewer infrastructure/pumping/treatment.

The Infrastructure Delivery Plan Oct 2016, Section 3 Implementation item 3.5, Page 83 may indicate this with the following comment:

'Developer's estimated cost:

£3,295,971

(based on site infrastructure designed and built by developer plus foul water storage (our underline) constructed directly by Southern Water).'

With the inspector's approval, there are two points of concern which we would like discussed at the examination.

- 1) In periods of extreme wet weather, what is the impact of an additional 500,000 litres upwards per day of the PTP 'cleaned' water flows into the Lancing Ditch network adding to the already accelerated surface water flows because of loss of 26 ha for absorption of rainfall precipitation?
- 2) PTPs are renowned for failing and causing downstream pollution. (see Mid Sussex Times link)
<http://www.midsussextimes.co.uk/news/warning-over-toxic-gardens-from-sewage-pollution-1-7423578>

cont./

2./

The eventual outflow is through the Shoreham sluices directly into the river and the SSSI protected salt flats (60 ha).

<http://magic.defra.gov.uk/MagicMap.aspx?startTopic=Designations&activelayer=sssIndex&query=HYPERLINK%3D%271003359%27>

A pollution event from such a large development could badly damage the integrity of this protected SSSI site. The ditch network would also be adversely badly affected ecologically.

The EA has increasing concerns about these problems as quoted in a British Waters code of practice document. (British Water, the association of major water companies which has EA accreditation.) The EA consultation submission 2016 also indicates this:-

‘We support the following wording in Policy 5 “The development is to be connected to sewerage and water distribution networks at the nearest points of adequate capacity, as agreed with Southern Water”. We support that the New Monks Farm development should be connected to the mains sewerage system.

However, the wording in paragraph 2.54A below does not appear to be fully effective in delivering this part of Policy 5. The wording does not emphasise that all mains sewerage connection possibilities should be fully considered in the first instance.’

Because of the authority’s ongoing consultation (pre plan submission) with the developer, we believe that the SWMP should have specifically covered the above aspects for sustainability in terms of foul waste drainage and its sustainability for ecology.

Also, if the SWMP had full data on flows/capacities, the answer to question 1 could be readily answered.

We believe this once again demonstrates that NPPF para 102 and the exception test part 2 have not been fully complied with.

Many thanks for your assistance in respect of the above.

Kindest Regards,

Bill Freeman
Chair