

The Parish Clerk  
Walberton Parish Council

.Your ref

**By Email Only**

Our ref

Date  
10 August 2020

Contact

Tel 01273 663027

Dear Sir/Madam,

### **Walberton Pre-Submission Neighbourhood Plan**

Thank you for consulting Southern Water on the Pre-Submission version of the Walberton Neighbourhood Plan.

Southern Water is the statutory sewerage undertaker for the area covered by Walberton Parish Council. Please find following our response in respect of specific policies. We hope that you find our response useful and that it will be taken into account when drafting the next version of the Neighbourhood Plan.

Yours faithfully,

***e Mayall***

Charlotte Mayall  
Regional Planning Lead  
Hampshire & West Sussex

### 3.4.5 Drainage and Flooding

As acknowledged in this section of the neighbourhood plan, there are multiple contributing factors to flooding in Walberton. In terms of sewer flooding, this is generally caused by surface and groundwater ingress into the sewers, which compromises its functioning causing surcharging. Surface and groundwater should be dealt with by appropriate land drainage. West Sussex Council is the lead organisation for the SWMP. Southern Water works closely with the County Council, as well as other organisations with surface water management responsibilities, including Arun District Council and the Environment Agency.

#### Proposed amendments

Accordingly, we propose the following amendments:

*~~...There are springs which flow continually down West Wallberton Lane. In very wet weather there is risk of mild flooding from drains bubbling up in The Street and raw sewage is discharged into Barnham Lane south of Choller Farm and in Eastergate Lane between Fiarfield and Winter Egg Farm. when surface 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.~~*

*~~...Houses on the west side of West Walberton Lane, about halfway down, experience sewage emerging into their gardens after rain. This has been occurring intermittently since 2004. flooding when ground water and surface water inundates the sewerage system and compromises its functioning, as it is not designed to take water that should be dealt with by appropriate land drainage.~~*

## 3.7 Community, Leisure and Wellbeing

### 3.7.1 Utilities

We note that changes made to the wording of the chapter relating to wastewater in the 'made' Walberton Neighbourhood Plan have now been reverted in the new draft. We therefore reiterate that the functioning of the sewerage system is comprised as it is not designed to accept surface water, which should be dealt with by appropriate land drainage. This issue has been recognised, and the Lidsey Surface Water Management Plan (SWMP) identifies solutions.

#### Proposed amendments

Accordingly, we propose the following amendments as originally made in the 2015 consultation:

*Waste water is mainly handled by Southern Water. The functioning of the sewerage system is not designed to accept surface water, which should be dealt with by appropriate land drainage. ~~which has serious capacity issues as described in-t~~ This issue has been recognised and the Lidsey Surface Water Management Plan published in October 2014 identifies possible solutions. ~~Some of the infrastructure is now old, and local ground conditions make Southern Water's task challenging.~~*

## Policy HP18 2020 Fontwell Field (National Trust Field)

Southern Water has undertaken a preliminary assessment of the existing capacity of local sewerage infrastructure and its ability to meet the forecast demand for the proposal of 40 homes at this location, as set out in Policy HP18. Our assessment reveals that the local network requires reinforcement in order to accommodate additional development. This is not a constraint to development however, provided planning policy for this site ensures that occupation of proposed development does not take place ahead of Southern Water's delivery of the necessary sewerage network reinforcement.

If development is permitted to proceed where adequate capacity in the sewerage network is not available and has not yet been provided, Southern Water has limited powers to prevent connection and the system could become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 170(e) of the National Planning Policy Framework (NPPF) 2019, which requires the planning system to prevent both new and existing development from contributing to pollution.

### Proposed amendment

In consideration of the above, we recommend the following text is added to Policy HP18 2020;

***The Plan allocates land on this site as shown on the Proposals Plan for forty dwellings comprising a mixture of 1, two and three bedroomed units and four flats. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.***

## Additional policy on the provision of water and wastewater infrastructure

Southern Water is the statutory wastewater undertaker for Walberton and as such has a statutory duty to serve new development within the parish.

Over the life of the Neighbourhood Plan, we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is therefore important to have policy provision in the Neighbourhood Plan which seeks to ensure and support the provision of the necessary infrastructure to meet these requirements.

We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2019) paragraph 28 establishes that communities should set out detailed policies for specific areas including *'the provision of infrastructure and community facilities at a local level'*. Also the National Planning Practice Guidance states that *'Adequate water and wastewater infrastructure is needed to support sustainable development'*.

Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

## Proposed amendment

To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:

*New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan*