

APPENDIX C - Scrutiny review of Sewerage Capacity: responses to consultation

Quotes from Southern Water highlighted in **bold**

Name	Date received	Summary of comments	HBC/Southern Water response
Ken (Davis)	23/10/09 (by email)	<p>Representation relates specifically to Old Roar Road area and issues with the capacity of the existing sewerage system. Argues that we need to fundamentally re-consider how we deal with waste water. Clear guidance on water efficiency measures should be provided in sustainable design policies and the Building Regulations</p> <p>Representation saved in: H:\Planning\FwdPlan\Scrutiny review-sewerage\Responses to consultation\K Davis 23.10.09</p>	<p>Southern Water is aware of the sewerage problem in this area, which results in discharges from the gravity sewer in the Valley. A scheme has been developed to resolve the problem and Southern Water will be promoting this with Ofwat for delivery during 2010-2015.</p> <p>The strengthening of the Building Regulations (Part G), programmed for implementation in April 2010, will also limit the amount of water usage per person in new residential development. Whilst this will not specifically cover waterless urinals, composting toilets or rainwater storage, the introduction of the national programme of the Code for Sustainable Homes will encourage high water efficiency standards in all new residential development.</p> <p>Southern Water would require development to be co-ordinated with provision of necessary sewerage capacity if existing capacity is insufficient to meet the anticipated demand. The company would not object to development but would require appropriate phasing conditions to allow enough time to deliver investment.</p> <p>We recognise that issues associated with surface water and sewerage flooding are at times related, but consider that they can also be considered as separate entities. Southern Water encourages the removal of surface water which currently drains to the combined system when opportunities arise with new development. This would make more efficient use of sewerage system, and release capacity for foul water drainage. However, alternative means of surface water management would be required to ensure that the risk of flooding is not increased on the site or elsewhere.</p>
Penny Beale	23/10/09 (by email)	Representation relates specifically to Old Town/Seafront area and	This representation makes reference to specific development sites at The Stade (Jerwood) and the Ice House. Southern Water was consulted on both of these planning applications, and has no adverse concerns in respect of the Jerwood

		<p>specific developments the Ice House, Jerwood Gallery. Suggests investigation into the condition of the existing sewerage system</p> <p>Representation saved in: H:\Planning\FwdPlan\Scrutiny review-sewerage\Responses to consultation\P Beale 23.10.09</p>	<p>Gallery.</p> <p>With regard to the Ice House, Southern Water concluded that they would provide foul and sewage disposal to service the proposed development, although the developer would need to formally apply for a connection to the public sewer – this was added as a note on the final decision notice. A condition was also imposed on the permission, which required full details of the means of disposal of foul and surface water drainage to be submitted to and approved in writing by the Local Planning Authority.</p> <p>Southern Water holds and maintains a record of all problems reported with respect to drainage difficulties. These records are then used to prioritise investment in line with the Regulator (Ofwat) requirements. Where investment is required to improve the level of service provided, Water and Sewerage Companies have to demonstrate to Ofwat that the customer bas supports this investment via increased water charges.</p> <p>In relation to all new development in the area, Southern Water would require development to be co-ordinated with the provision of necessary sewerage capacity if existing capacity is insufficient to meet the anticipated demand. The company would not object to development but would require appropriate phasing conditions to allow enough time to deliver investment.</p> <p>It is also important to note here that through the Local Development Framework, the planning system will, in future, seek to ensure that infrastructure needs for new development are identified at the outset where possible. As such, sewerage capacity is being considered in detail as part of the Site Allocations process, and dialogue with Southern Water is ongoing. Each site identified will be assessed in terms of sewerage capacity, and infrastructure needs will be set out in the final policy.</p>
Wishing Tree Residents Association	22 November (by email)	Representation specifically relates to potential new development in the Wishing Tree area - Fern Road, the Grove School, and potential	The Resident's Association have raised some concern about the number of new developments in the area, specifically, the former Westerleigh School site, Land in Fern Road and the potential development of the Grove School. The response to each of these is as follows:

		<p>impact on the Hollington Stream.</p> <p>Representation saved in: H:\Planning\FwdPlan\Scrutiny review-sewerage\Responses to consultation\Wishing Tree RA 22.11.09</p>	<p>The remainder of Westerleigh School is identified in the Strategic Housing Land Availability Assessment as a potential housing site. Southern Water initially assessed this in terms of sewerage capacity, and has indicated that there is potential for the capacity to be provided through surface water removal.</p> <p>Land at Fern Road – Southern Water were not consulted on this application, as the number of dwellings proposed was less than the 20 dwelling threshold usually used to notify them.</p> <p>Potential development of the Grove School site – This will not be looked as a potential housing site until the issue of the Academies is resolved.</p> <p>Southern Water would require development to be co-ordinated with provision of necessary sewerage capacity if existing capacity is insufficient to meet the anticipated demand. The company would not object to development but would require appropriate phasing conditions to allow enough time to deliver investment.</p> <p>Following the effects of the July flooding around the Hollington Stream, Hastings Borough Council has been working closely with the Environment Agency and Southern Water, and we have since submitted a bid to DEFRA for funding of a surface water management plan to start to address flood risk. Southern Water indicated that this was a 1 in 400-600 year rainfall event, and that the infrastructure could not be expected to cope in such a rare situation.</p> <p>As part of the Site Allocations Development Plan Document infrastructure requirements to support new development will be investigated in detail including specific requirements for large allocations and for clusters of development in an area.</p>
Gaby Hill	13 November (by email)	Representation relates to St Matthews Gardens/Bohemia area. It makes specific reference to gully overflows in St Matthews Gardens and the potential impact on the	<p>Road gully cleansing is managed by HBC as part of the maintenance agreement with East Sussex County Council. The highways team works closely with the contractor to complete a programme with a target to cleanse all gullies once every 12 months.</p> <p>There is however often a problem in residential areas with parked cars and whilst</p>

		<p>sewerage system following development sites in London Road and at Horntye. Concern regarding the effect of paved driveways on sewerage system.</p> <p>Representation saved in: H:\Planning\FwdPlan\Scrutiny review-sewerage\Responses to consultation\G Hill 13.11.09</p>	<p>operatives can sometimes work between parked cars, the equipment used is fairly large and they have to be aware of the risk of damage to vehicles.</p> <p>This will sometimes mean that they are unable to clean all gullies when scheduled because of a vehicle parked over them or too close to them. Under normal circumstances they will make two routine attempts to access a gully to clean it; including putting up advance warning signs and leafleting parked cars. If there is still a problem in an area where flooding may be an issue, the Council can even arrange for vehicles to be towed away.</p> <p>The records for St Matthews Gardens show that the programmed cleaning took place on 25th June 2009. At that time however it was only possible to clean 3 of the 16 gullies in the road, due to parked cars. This was despite the fact that signs and cones were placed in the road. Please note however, the Council has not received any reports of localised flooding in this area.</p> <p>Only few reports of flooding have been received by Southern Water, suggesting that all problems are not reported. Southern Water suggest that customers are reminded of the telephone number to report these – 0845 2780845.</p> <p>In terms of the specific planning queries, we can confirm that Southern Water is consulted on various planning applications, depending on numbers of dwellings or the level of floorspace proposed.</p> <p>A condition relating to sewerage capacity has been attached to the outline planning permission for the demolition/rebuilding of flats at the dance school in London road relating to sewerage capacity. This states that the flats cannot be occupied until the Planning Authority has confirmed in writing that they are satisfied with the sewerage disposal/management details submitted. (HS/OA/08/391). Southern Water has also stated that they would require development to be co-ordinated with provision of necessary sewerage capacity if existing capacity is insufficient to meet the anticipated demand. The company would not object to development but would require appropriate phasing conditions to allow enough time to deliver investment</p>
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Clive Vale Residents Association	25 November 2009 (by post)	<p>Representation relates to Harold Road area, particularly from New Road to south of Dudley Road School. Association believes that there should be no further development allowed in Harold Road until an upgrade has been carried out. Also, concern with regard to kerb heights and surface water flooding</p> <p>Scanned image saved in H:\Planning\FwdPlan\Scrutiny review-sewerage\Responses to consultation\Clive Vale RA 25.11.09</p>	<p>The Residents Association request that no further development is undertaken in this area, until Southern Water has carried out an upgrade. From a planning perspective, we are unable to refuse development if the developers are willing to put in the required infrastructure including upgrading of the sewerage system.</p> <p>With any new development where Southern Water believes the present system to be inadequate, the developer will be given the opportunity to draw up proposals to rectify the matter to the satisfaction of the Council and Southern Water.</p> <p>Should such a development be given planning permission, a planning condition will be attached requiring full details of an acceptable system to be submitted to and approved before the development can commence, and no occupation of the buildings will be allowed until the required works are carried out to the satisfaction of the Council and in practice the Council will be guided by the views of Southern Water.</p> <p>The representation also refers to 2 major developments in Harold Road, and the present application for development at Hawthorn Road. One of the developments in Harold Road has already been built, and discussions are ongoing with Southern Water regarding the second. Foul water discharge from the Hawthorn Road site has been agreed with Southern Water, and the perceived groundwater issue is</p>

			<p>resolved. However, they will not allow any further land drainage discharges to the public sewer, which will have to be addressed by the developer.</p> <p>Appendix C refers to development at 309-311 Harold Road, and its conditions of development will not be ignored or forgotten as suggested. Construction has not yet started at the site, but conditions will be monitored when it does.</p> <p>Southern Water would require new development to be co-ordinated with the provision of necessary sewerage capacity if existing capacity is insufficient to meet the anticipated demand. The company would not object to development but would require appropriate phasing conditions to allow enough time to deliver investment.</p> <p>Southern Water is also aware of the properties in Harold Road which are at risk of flooding during rainfall. This is due to a combination of flow directly from the highway and from the sewerage system. Flood gates were installed at these properties during 2009. Although flooding will not be prevented, the flood gates will prevent the flood waters from entering the properties.</p>
Ore Valley Action	30 November 2009 (by post)	<p>Representation relates to general sewerage and policy issues in the Frederick Road and Harold Road areas in particular, and seeks confirmation on proposals at Horntye and Archery Road.</p> <p>Scanned image saved in H:\Planning\FwdPlan\Scrutiny review-sewerage\Responses to consultation\OV Action 30.11.09</p>	<p>This representation refers to two specific proposed development sites at Archery Road and Horntye.</p> <p>No decision has been reached with regard to either application. Southern Water has been contacted with regard to the proposed development at Archery Road, and are still out to consultation.</p> <p>Southern Water has also been consulted on the current Horntye planning application, and initial investigations indicate that there is not enough sewerage capacity at present. Should this application be given permission, a planning condition will be attached requiring full details of an acceptable system to be submitted to and approved before the development can commence, and no occupation of the buildings will be allowed until the required works are carried out to the satisfaction of the Council, and in practice, the Council will be guided by the views of Southern Water.</p>

			<p>With regard to the adequate treatment of sewage, and the use of a long sea outfall, a new wastewater treatment works was constructed to treat flows arising in Hastings and Bexhill, under the Urban Wastewater Treatment Directive. This Wastewater Treatment works provides secondary treatment to agreed European Standards. Treated flows are ultimately discharged to the English Channel.</p>
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