from Southern Water

Planning Services
Adur & Worthing Councils
Portland House
44 Richmond Road
Worthing
West Sussex
BN11 1HS

Your ref
AWDM/0693/23

Our ref
DSA000032715

Date
10 April 2024

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Outline planning application for residential development of approximately 90 dwellings, associated car parking, open spaces and landscaping, with primary access from Lyons Way and approximately six of these dwellings accessed via Beeches Avenue and improved pedestrian footpath link to Charmandean Lane; also, rationalisation of car parking provision at the existing football ground.
Site: AWDM/0693/23: - Land North of Beeches Avenue, Worthing, West Sussex, BN14 9JF.

Thank you for your letter dated 20 March 2024.

Following the review of the submitted documents, we have the below comments for the Planning consultation.

Hydrological Assessment

The provided response outlines the SuDS hierarchy and is reliant on the information within the SuDS Manual. Although the SuDS manual is a useful guide for drainage engineers, it does not provide technical groundwater guidance for hydrogeologically sensitive locations. This is highlighted by the lack of guidance in regard to SuDS located in Source Protection Zones or SuDS located in dual porosity Chalk aquifers, whereby fracture flow bypasses the saturated zone attenuation process. The shallow groundwater table will also reduce saturated zone attenuation.

The SuDS manual states the following in regard to working in an SPZ1;

“In England and Wales, where the discharge is to protected surface waters or groundwater, an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection, is required that provides environmental protection in the event of an unexpected pollution event or poor system performance. Protected surface waters are those designated for drinking water abstraction. In England and Wales, protected groundwater resources are defined as Source Protection Zone 1.”

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Meridian's response dated 15th June 2023 indicates alternative surface water discharge (not to ground) could be implemented should treatment options not be sufficient to achieve drinking water standards on arrival at our source. Note due to the shallow unsaturated zone and potential fracture flow; contamination attenuation at this location would be minimal.

Southern Water's do not object to this planning application on the following conditions;

- A Hydrogeological Risk Assessment must be completed and approved by Southern Water. This report will provide demolition, construction and operational impact assessments of proposed developments to the groundwater environment. The assessment will provide enhanced groundwater flow conceptualisation and understanding. Where adverse groundwater impacts could arise, appropriate mitigations should be suggested to eliminate or alleviate the impact, or achieve betterment. The findings and outcome of this assessment will feed the subsequent assessments and designs listed below.

- Final drainage design be approved by Southern Water. Boreholes soakaways are prohibited at this locations for the reasons detailed in this and our previous response. To permit discharge to ground it must be proven the effluent will achieve drinking water standards by the time it is received by our source, otherwise discharge to ground will not be permitted.

- A Foundation Risk Assessment to be completed and this document will be reviewed and approved by Southern Water. This assessment will need to address turbidity and contamination impacts. It will also require a solution feature mitigation plan. All adverse impacts to the Chalk aquifer will need to be mitigated.

- A CEMP will be required and this document will also need to be reviewed and approved by Southern Water. This should include reference to environmental best practice guidance and contamination prevention. This document should provide appropriate mitigations to ensure the Chalk aquifer is not impacted.

All other comments in our response dated 09 June 2023 remain unchanged and valid.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team
Developer Services

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