

## RE: AWDM/0153/25 - Queens Parade North Road Lancing West Sussex

---

Date:18/11/2025

We are writing in response to the latest comments from West Sussex County Council as the Lead Local Flood Authority (LLFA), received 28<sup>th</sup> October 2025. Who have requested we engage with Southern Water, this response states;

### **Issue 1 – SuDS Hierarchy Compliance**

*As per the SuDS standards, discharge to a surface water sewer, or another piped surface water drainage system is superior to discharge into a combined system. We need to be satisfied all surface water only systems in the vicinity either do not have the required capacity or the required connection is not possible.*

*(We note that Appendix B has not been provided and we would please request this is added to the portal). We would be willing to accept any connection to a piped surface water system for the surface water discharge in the vicinity of the site. This would be subject to the appropriate easements, confirmation that the receiving system has the required capacity for any additional flow and a plan illustrating the connection location. It is our understanding that should it be under private responsibility you would only require consent from the landowner at the point of proposed discharge. However if it is a shared system under the Transfer of Private Sewers Regulations 2011 then permission should be sought from Southern Water. A CCTV survey may assist in determining the nature of the system. We would not be in a position to recommend an individual contractor as we are an impartial body.*

### **Issue 2 – Inappropriate use of a combined system (discharge)**

*While the Applicant has reasserted that the existing connection is to a combined sewer, Southern Water have not confirmed this. We need to see evidence that this is accepted by Southern Water, and that this is not simply a case of a foul system with misconnections of surface or combined discharges. Without this confirmation we would be allowing a connection to a foul sewer which is not permitted (irrespective of any existing drainage that connects to it).*

### **Issue 3 - Inappropriate use of a combined system (on site)**

*We note that it is proposed to retain a combined surface and foul water system within the boundary not to a confirmed combined system then the Applicant will need to design a new scheme that maintains separation prior to two separate discharges to appropriate systems (foul and surface water).*

## **Issue 1**

Aegaea as per the response from the LLFA now require Southern Water engagement as the asset map provided by the LLFA demonstrates that the private sewer has multiple connections and is therefore viewed to require Southern Water comment and approval” Transfer of Private Sewers Regulations 2011 then permission should be sought from Southern Water”.

The LLFA have alluded that a CCTV survey of this sewer should be conducted, we presume that Southern Water already have knowledge of the type of sewer. We have been advised by the LLFA it is surface water only. Is this true ?

Can Southern Water confirm whether a connection is possible and whether capacity exists in this network? If it can support a connection, we request that Southern Water confirm this in writing as well as setting out next steps to support a future connection.

Utility surveys have not been sourced but connection to the other side of the road if the asset map is correct in terms of identifying the location of the private drain could have future complications. We therefore request that the solution discussed under Issue 2 is considered for approval if this circumstance were to arise.

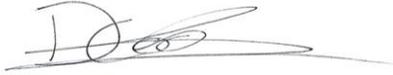
## **Issue 2**

Aegaea and our client has independently sourced a CCTV survey which confirmed the existing surface water connects into what can be considered a legacy combined system but now demarcated as “Foul System”. Attached is the CCTV survey for Southern Water review and comment. The proposed development would provide an upward extension as such the overall runoff from the scheme would be reduced via SuDS when compared to the existing situation which currently discharges into this legacy combined sewer network. If permission cannot be sourced for the private network, we request permission to continue to discharge into the existing at a reduced rate using SuDS. The overall volume is unlikely to change as the development is for an upward extension only. If an additional CCTV survey is required to verify this, please do let us know.

## **Issue 3**

As above, if a connection to the private sewer can be permissioned then separate connections will be provided. However, if a connection to the private sewer cannot be provided then we will promote that the solution proposed under Issue 2 is permissioned.

We would welcome your response at your earliest opportunity.



**Daniel Cook BSc (Hons), MSc MCIWEM C.WEM and the Aegaea Team**

[enquiries@aegaea.com](mailto:enquiries@aegaea.com) / [daniel@aegaea.com](mailto:daniel@aegaea.com)

Enclosed:

- Letter from the LLFA 28/10/2025
- Asset plan from the LLFA
- CCTV Survey (November 2024)



# Appendix A - Letter from the LLFA 28/10/2025

Ground Floor  
Northleigh  
County Hall  
Chichester  
West Sussex  
PO19 1RH



**Lead Local Flood Authority**

Date 28<sup>th</sup> October 2025

Peter Barnett  
Local Planning Authority  
Planning and Development  
Adur & Worthing Councils  
Portland House  
Richmond Road  
Worthing  
BN11 1HS

Dear Peter,

**RE: AWDM/0153/25 – Queens Parade North Road Lancing West Sussex**

Thank you for reconsulting us on the above. We have reviewed the above application further and wish to make the following comments;

Issue 1 – SuDS Hierarchy Compliance

As per the SuDS standards, discharge to a surface water sewer, or another piped surface water drainage system is superior to discharge into a combined system. We need to be satisfied all surface water only systems in the vicinity either do not have the required capacity or the required connection is not possible.

(We note that Appendix B has not been provided and we would please request this is added to the portal). We would be willing to accept any connection to a piped surface water system for the surface water discharge in the vicinity of the site. This would be subject to the appropriate easements, confirmation that the receiving system has the required capacity for any additional flow and a plan illustrating the connection location. It is our understanding that should it be under private responsibility you would only require consent from the landowner at the point of proposed discharge. However if it is a shared system under the Transfer of Private Sewers Regulations 2011 then permission should be sought from Southern Water. A CCTV survey may assist in determining the nature of the system. We would not be in a position to recommend an individual contractor as we are an impartial body.

Issue 2 – Inappropriate use of a combined system (discharge)

While the Applicant has reasserted that the existing connection is to a combined sewer, Southern Water have not confirmed this. We need to see evidence that this is accepted by Southern Water, and that this is not simply a case of a foul system with misconnections of surface or combined discharges. Without this confirmation we would

be allowing a connection to a foul sewer which is not permitted (irrespective of any existing drainage that connects to it).

Issue 3 - Inappropriate use of a combined system (on site)

We note that it is proposed to retain a combined surface and foul water system within the boundary of the site. The Applicant should ensure they comply with building regulations in this regard. If the proposed discharge location is not to a confirmed combined system then the Applicant will need to design a new scheme that maintains separation prior to two separate discharges to appropriate systems (foul and surface water).

Due to the above we must maintain our objection at present until the above matters are resolved.

Yours sincerely

Natalie Biddulph

**Flood Risk Management Team**

[FRM@westsussex.gov.uk](mailto:FRM@westsussex.gov.uk)

**Documents considered as part of this response:**

Aegaea Response AEG5636\_BN15\_Lancing\_07\_A (undated)



# Appendix B - Asset plan from the LLFA



<b>Boundary Box</b> □ Boundary Box	<b>Break Pressure Tank</b> BPT Break Pressure Tank	<b>Capped End</b> □ Capped End	<b>Hydrant</b>		
			▲ Emptying Plug	⊕ Fire Hydrant	⊙ Washout Hydrant
<b>Pressure Monitoring</b> ● Logger	<b>Service Reservoir</b> ⊙ Covered ⊙ Tower	<b>Meter</b> ⊙ Meter	<b>Valve - Controllable</b>		
			Open Valve	⊕ Closed Valve	✕ Stop Tap
<b>Site</b>		<b>Valve - Flow</b>			
◇ Abstraction Point	⊙ Supply Works	⊙ Air Valve	⊙ Non-Return Valve	⊙ Washout Empty Valve	
⊙ Booster Station	⊙ Transfer Station	<b>Valve - Pressure</b>			
⊙ Surface Reservoir	⊙ Underground Source	⊙ PRV Pressure Reducing Valve	⊙ PSV Pressure Sustaining Valve	<b>Pipe Bridge</b>	
				= = Pipe Bridge	
<b>Water Pipe</b>			<b>Water Area</b>		
— Communication	— Trunk	— Decommissioned	■ Water Supply Zone	⊙ District Meter Area	
— Distribution	— Raw	— Discolouration			
— Non-Potable	— Private				

### Map Title: SW Print

Printed By: Kelly.Donaldson

Date Printed: 04/03/2025

Map Scale: 750

*The information provided is believed to be correct but is provided on an 'as is' basis and without any warranty or condition express or implied, statutory or otherwise as to its quality or fitness for purpose. Actual positions of assets should always be determined on site.*





# Appendix C - CCTV Survey

