

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

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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.

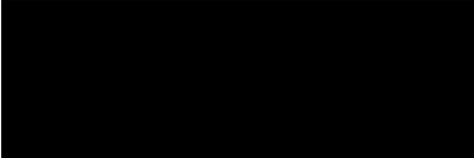
## **Issue 2**

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	⊕ AV Air Valve	⊕ NRV Non-Return Valve	⊕ WO 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

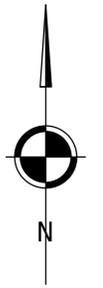
Map Scale: 750

*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



Note:  
 The survey is plotted on a plane local Grid. Orientation to National Grid.  
 All levels relate to Ordnance Datum, achieved using the OS National GPS Network.

Survey Control Markers established for Mapping purposes only and should not be used for Construction without the written approval of Survey Operations Ltd.

Drainage information must be verified with local authority records before use

SURVEY STATIONS			
Name	Easting	Northing	Height
SO1	518235.62	104618.30	6.55
SO2	518182.18	104619.67	6.99
SO3	518211.18	104627.13	6.71
SO4	518229.20	104675.21	6.67
SO5	518246.71	104665.92	6.68



**Legend**

- SW STORM WATER SEWERS
- FW FROIL WATER SEWERS
- WM WATER MAIN
- GM GAS MAIN
- EL ELECTRIC CABLES
- DUCT CABLE DUCTING
- BT BT (UNDERGROUND)
- CTV CABLE TV
- CCTV CLOSED CIRCUIT TV
- UF UNIDENTIFIED FEATURE
- LI LINE OF POSSIBLE SUB-SURFACE FEATURE DETERMINED FROM GPR CONTACTS
- UP UNIDENTIFIED PIPE
- UC UNIDENTIFIED CABLE
- UNPR UNPROVEN FEATURE
- UNPR Cable Trace signal lost at this point
- UNPR Unable to Trace Sewer past this point due to Blockage / Obstacle / Pipe Material
- CONC CONCRETE
- EXTENT OF SURVEY BY SURVEY OPERATIONS LTD.
- EXTENT OF SURVEY BY SURVEY OPERATIONS LTD.(JULY 2022)
- FW CONNECTIVITY BETWEEN CHAMBERS FROM CCTV REPORT
- SW CONNECTIVITY BETWEEN CHAMBERS FROM CCTV REPORT
- Cover Position from CCTV Report NOT SURVEYED ON TOPOGRAPHICAL SURVEY
- 0.00 BURIED FEATURE FOUND USING RADAR

UNIDENTIFIED - A buried feature or utility that has been located, but we are unable to state what it is.

UNPROVEN - The assumed location of a reported feature or utility, usually taken from records, but not found during the utility trace (due to various conditions).

CAUTION - Electric pot ended cables, even when they are live, are unable to be detected or traced.

**Unproven Lines**

- EL UNPROVEN ELEC
- BT UNPROVEN BT
- GM UNPROVEN GAS
- WM UNPROVEN WATER
- SW UNPROVEN SURFACE
- FW UNPROVEN FROIL

All unproven lines without additional notes on drawing show the approximate location of a reported utility or feature as indicated on available stat records.

**UNDERGROUND UTILITIES SERVICES DISCLAIMER**

Where indicated, no allowance has been made for sub-surface entry into manholes, other chambers or confined spaces below ground level. Therefore any details relating to depths, sizes etc. are taken from the surface and as such will be approximate.

We have endeavoured to supply you with the most accurate data possible by using methods and equipment that are at the forefront of our industry. We have taken great care in the detection of pipework and buried features, but as with all methods of detecting underground or buried utilities the information provided is based on results obtained from electromagnetic techniques, and as such may be liable to distortion or errors beyond the reasonable control of the operator or his instruments.

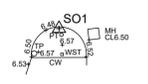
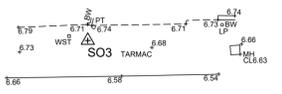
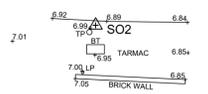
It is the responsibility of the user under Health & Safety (HS647) Guidelines to satisfy himself of the suspected location of any services prior to excavation of the services shown.

**NOTE 1**

This utility survey has been undertaken using:  
 A: Radiodetection RD4000 + RD4000 TID  
 B: Mola Geoscience Grounds Probing Radar

**NOTE 2**

Power carrying features shown on this drawing are shown as an individual service line. This does not necessarily represent the number of cables actually present and it is possible that there could be multi numbers of cables including HV, LV and communications transmission cables following the same trace line. These could be at different depths, the trace signal from the deeper cables being masked by signal emitted from the shallower service above. Cable runs could also be present running parallel to the single line shown.



Smith Street, Skelmersdale, Lancs. WN8 8LN  
 Tel: 01695 725662 Fax: 01695 51816  
 Email: mail@survops.co.uk - www.survops.co.uk

Client	
Aegaea	
Drawing Title	
Utility Survey of Land at:	
Queens Parade	
Lancing	
Scale(s)	1:200
Date	Nov 24
Job Number	24J120
Surveyor	MWK
Drawn	DS
Checked	SO

Sheet Size & Drg Number & Revision  
**A1 24J120/001**