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Developer Services  
Southern Water  
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Tel: 0330 303 0119

Email: [southernwaterplanning@atkinsglobal.com](mailto:southernwaterplanning@atkinsglobal.com)

Your Ref

APP/18/00287

Our Ref

PLAN-022472

Date

24/04/2018

Dear Sirs,

**Proposal: Phased development comprising the erection of 3No. warehouses (Class B2/B8) (two warehouse buildings to be erected in phase 1 and one warehouse building to be erected in phase 2) and associated parking and access from Hermitage Park.**

**Site: Former Council Depot Site, Harts Farm Way, Havant, PO9 1FA.**

**APP/18/00287**

Thank you for your letter of 04/04/2018

Please find attached a plan of the Southern Water sewer records showing the approximate position of a public foul sewers within the site. The exact position of the public sewers must be determined on site by the applicant before the layout of the proposed development is finalised.

Please note:

No development or new tree planting should be located within 3.5 metres either side of the external edge of the public sewers and all existing infrastructure should be protected during the course of construction works.

No new soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of a public sewers.

In order to protect drainage apparatus, Southern Water requests that if consent is granted, a condition is attached to the planning permission. For example "The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to protect the public sewers, prior to the commencement of the development."

Due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer now deemed to be public could be crossing the above property. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its condition, the number of properties served, and potential means of access before any further works commence on site.

The applicant is advised to discuss the matter further with Southern Water, Sparrowgrove House Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or [www.southernwater.co.uk](http://www.southernwater.co.uk)

Reference should be made to Southern Water publication "A Guide to Tree Planting near water Mains and Sewers" with regards to any Landscaping proposals.

Southern Water has undertaken a desk study of the impact of the proposed development on the existing public sewer network.

This indicates that with connection at the "practical point of connection" as defined in the New Connections Services implemented from 1st April 2018 that there is an increased risk of flooding unless network reinforcement is undertaken.

This reinforcement will be provided through the New Infrastructure charge however Southern Water will need to work with and understand the development program and to review if the delivery of network reinforcement aligns with the occupation of the development.

Southern Water hence requests a condition:

"Occupation of the development to be phased to align with the delivery of sewerage infrastructure to prevent the increased risk of flooding"

Our initial investigations indicate that Southern Water can provide surface water disposal to service the proposed development, for a surface water flow of 33 l/s for connection at manhole reference SU70059854. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

We request that should this application receive planning approval, the following informative is attached to the consent:

A formal application for connection to the public sewerage system is required in order to service this development, please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or [www.southernwater.co.uk](http://www.southernwater.co.uk) Please read our New Connections Services Charging Arrangements documents which has now been published and is available to read on

our website via the following link <https://beta.southernwater.co.uk/infrastructure-charges>

The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS).

Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long term maintenance of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme
- Specify a timetable for implementation
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

It is the responsibility of the developer to make suitable provision for the disposal of surface water. Part H3 of the Building Regulations prioritises the means of surface water disposal in the order

- a Adequate soakaway or infiltration system
- b Water course
- c Where neither of the above is practicable sewer

Southern Water supports this stance and seeks through appropriate Planning Conditions to ensure that appropriate means of surface water disposal are proposed for each development. It is important that discharge to sewer occurs only where this is necessary and where adequate capacity exists to serve the development. When it is proposed to connect to a public sewer the prior approval of Southern Water is required.

The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

Due to the vibration, noise and potential odour generated by sewage pumping stations, no habitable rooms should be located closer than 15 metres to the boundary of a proposed pumping station site.

We request that should this application receive planning approval, the following condition is attached to the consent: "Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water."

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with Sewers for Adoption standards will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

The proposed development site is located approx 200 metres from BUDDSFARM WTW. Southern Water endeavours to operate its sewage and sludge treatment works efficiently and in accordance with best practice to prevent pollution. However the very nature of sewage treatment works means that they are not ideal neighbours to sensitive land uses. Development sensitive to odour pollution in close proximity to sewage treatment works can suffer from smells that are inherent in the treatment process.

We therefore ask that the precautionary principle is adopted by Local Planning Authorities to avoid potential land-use conflict, in accordance with PPS23. This can be achieved by designating an appropriate buffer zone around the treatment works within which development sensitive to odour is excluded or by a S106 agreement in which the developer funds measures at the works required to control odours. I will describe later how the size of the buffer zone can be determined but will first make reference to PPS23.

Appendix A of PPS23 lists matters that may be material in the consideration of individual planning applications. It includes: " the need to separate necessary but potentially polluting and other land uses .....so as to reduce conflicts, for example by identifying where necessary areas around existing sources of pollution in which proposed new development and uses should be carefully considered in terms of the potential as pollution receptors."

Paragraph 11 states: "Where, for example, new housing is proposed close to a source of potential pollution, the risk of pollution from the normal operation of the process or the potential impacts and the extent to which the proposals address such risks will influence whether or not development should proceed...."

Paragraph 1.23 of Annex 1 advises: "Intending developers and LPAs should also be aware that the effects of odour from sewage treatment works on neighbouring land where people are present may need to be considered."

Paragraph 1.50 of Annex 1 advises: "where a development is planned in or near to an area of existing sources of pollution, it may be appropriate to enter into a planning obligation under Section 106 of the Town and Country Planning Act 1990....."

Returning to the question of the size of the buffer zone required, the water industry predicts the dispersion of odours from point sources using computer modelling. Meteorological Office data is used to predict the dispersion of odours throughout a "receptor grid" radiating outwards from the works. Modelling is based on the industry standard for odour of 0.6 parts per billion (ppb) of hydrogen sulphide with a 98-percentile probability. Sensitive development that is subject to levels above this standard is likely to lead to complaints about odour from residents.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'J. Smith' or similar, written in a cursive style.

Developer Services