



The countryside charity
Sussex

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Attn.: Case Officer: Mr D Easton

Arun District Council: Planning

planning@arun.gov.uk

Dear Mr Easton,

29 March 2024

CPRE Sussex representation objecting to:

Representation supplementing and reinforcing our objection, dated 14 March 2024, to:

AL/11/24/OUT

Land East of Westergate, Westergate

Hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission for alterations to site access off Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement

For the reasons explained below we ask that to protect the Lidsey Rife BOA, the proposed development should not commence until the Lidsey WwTW and related sewage infrastructure has been upgraded to provide the capability needed to treat sewage from AL/11/24/OUT without storm overflow spills into the Lidsey Rife. This essential constraint could be secured by means of a Grampian Condition.

1. Souther Water (SW) advise that the Lidsey Wastewater Treatment Works (WwTW), located approximately 1km Southeast of the proposed development site, is the nearest WwTW 'where capacity is currently available' to treat sewage from the proposed scheme (SW letter to WSP, reference 000023113, dated 14 July 2023).

1.1 The Lidsey WwTW discharges overspills into the Lidsey Rife.

1.2 The Lidsey Rife is one of three Biodiversity Opportunity Areas (BOA) identified in the Arun Local Plan 2011-2031 (July 2018): Policy ENV DM3 Biodiversity Opportunity Areas.

1.3 The Local Plan states that 'Biodiversity Opportunity Areas (BOAs) represent the targeted landscape-scale approach to conserving biodiversity and provide the basis for

an ecological network. They identify areas that provide the greatest opportunity for habitat creation and restoration and they have multiple benefits including improving the natural environment and providing quality areas in which people can live, work and enjoy' (paragraph 17.2.3).

2. Spillage data compiled and published by the Environment Agency show that the number and duration of storm overflow spills from the Lidsey WwTW into the Lidsey Rife, recorded during 2021, 2022 and 2023, were as follows:

2021: 86 times for 1,411 hours (58.8 days);

2022: 78 times for 1579.05 hours (65.8 days);

2023: 164 times for 3485.26 hours (160.3 days: 5 months).

(Spill Frequency Portal: Event Duration Monitoring (EDM) Data:

https://experience.arcgis.com/experience/c9b8f3ba094c429aa30e0e2b6eaf43ac#data_s=id%3AdataSource_3-18df0422db1-layer-4%3A31891)

3. The Lidsey WwTW does not have 'capacity available' to treat current levels of sewage without substantial spillage, let alone additional sewage from the proposed scheme's 400 new homes.

4 Policy ENV DM3 Biodiversity Opportunity Areas stipulates that 'Development shall:

a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones.

b. Be designed in order to minimise disturbance to habitats.

Development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted.

Where a development scheme would result result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application'.

Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA'.

5. Southern Water in their letter to WSP advise that: 'The proposed development would increase flows to the public sewerage system which may increase the risk of flooding to existing properties. Additional off-site sewers or improvements to existing sewers will be required to provide network capacity from the point of practical connection, funded by the New Infrastructure Charge.' And that they:

'aim to provide this in 24 months following the date that planning has been granted for developments not identified as strategic sites in our current business plan. Strategic

sites are larger developments and will often take longer for a full solution to be provided’.

5.1 AL/11/24/OUT is a ‘larger development’.

6. Would Southern Water’s ‘additional off-site sewers or improvements to existing sewers’ prevent storm overflow spills? This should be an important consideration in the deciding of this application.

Conclusion

7. To comply with Policy ENV DM3 the impact that the increased flows to the public sewage system, acknowledged by Southern Water, would have on the frequency and duration of outflow spills from the Lidsey WwTW into the Lidsey Rife and the impact that resultant spills would have on the Lidsey BOA should be assessed and considered in the deciding of AL/11/24/OUT.

8. We ask that to protect the Lidsey Rife BOA, development should not commence until the WwTW and related sewage infrastructure has been upgraded to provide the capability needed to treat sewage without storm overflow spills into the Lidsey Rife. This essential constraint could be secured by means of a Grampian Condition.

Yours faithfully,

Dr R F Smith, DPhil, BA (Hons) FRGS

Trustee CPRE Sussex

Copy to:

Chair CPRE Sussex