# A Position Statement

**On managing new housing development in the Apuldram Waste Water Treatment works catchment.**

*This is a joint Environment Agency and Southern Water Services position statement which has been prepared with the involvement of the Chichester Water Quality Group.*

*The purpose of this statement is to support planning officers and developers working within this catchment. The Apuldram Wastewater Treatment Works (WwTW) serves an area including Chichester city, and the neighbouring parishes of Apuldram, Donnington and Fishbourne.*

*This statement builds on policies in the “Chichester Local Plan: Key Policies 2014-2029”, the “Surface Water and Foul Drainage Supplementary Planning Document – September 2016” and the “Water Quality Assessment Report – 2018”.*

# Our position

We want to prevent environmental harm and safeguard the special water environment of Chichester Harbour.

Development in the Apuldram WwTW catchment will adhere to the following principles:

* New development outside of the Settlement Boundaries\* of Chichester, Fishbourne and Stockbridge will not drain to the Apuldram WwTW. It is expected that larger scale development will be directed to alternative WwTW catchments, notably Tangmere WwTW, via the new sewer pipeline connection once operational.
* Minor development (1-9 dwellings) within Settlement Boundaries of Chichester, Fishbourne and Stockbridge – no objection to developments connecting to Apuldram WwTW. Where possible applicants should seek to achieve no net increase in flows.
* Major development (10+ dwellings) within Settlement Boundaries of Chichester, Fishbourne and Stockbridge – prior to approval applicants will need to demonstrate no net increase in flows to the sewer network of the Apuldram WwTW. Where development cannot demonstrate this the Chichester Water Quality Group will support the Council in refusing planning permission or suggesting appropriate planning conditions to address the environmental concerns.
* *Settlement Boundaries are defined in the Chichester Local Plan: Key Policies 2014-2029 and shown on the Local Plan Policies Map on the Chichester District Council website.*

# Background

The Apuldram WwTW discharges to the head of Chichester Harbour, an area which is internationally designated for wildlife. Apuldram WwTW treats wastewater via the continuous discharge to the highest standards. The Environment Agency has set strict limits on the Environmental Permit to protect the sensitive and important estuarine environments and comply with legal obligations under the Conservation of Habitats and Species Regulations

2017. Any additional increase in wastewater that would exceed the current permit limits could cause environmental deterioration within the Harbour.

In addition to the constraints in the Harbour, the catchment is affected by a high level of groundwater infiltration into the sewer network. Historically, this has led to high winter flows to the treatment works and at times led to the treatment works operating its storm overflow continuously for significant periods of time. Whilst such storm flows will be diluted by the groundwater there is concern that the frequency and duration of these events can have a detrimental impact on the water quality of the Harbour, and may contravene obligations to ensure that the environment is not damaged.

In 2010 a Water Quality Group was established in order to work together to understand the constraints further; to identify solutions that will provide additional wastewater treatment capacity; and support future development in the District whilst protecting the environment.

# What we have done to date

Whilst there are no easy answers to the situation at Chichester we have been successful in securing improvements to both protect the environment and support development within the area. These include:

* + Installation of ultra-violet (UV) treatment on the storm overflow at Apuldram WwTW. This means that effluent being discharged through the storm overflow will be subject to treatment to reduce bacteria levels and micro-organisms entering the Harbour.
  + The introduction of conditions on the Environmental Permit for Apuldram WwTW means that Southern Water are investigating the scale of the groundwater sewer infiltration in the city and implementing measures to reduce or minimise its impact on the storm overflow at the WwTW.
  + Supporting Southern Water’s bid to Ofwat for an upgrade to Tangmere WwTW to provide capacity for larger scale development around Chichester city. The upgrade is now operational and a new sewer pipeline will be installed to connect Chichester to Tangmere by 2020.

These outcomes enabled the adoption of the Chichester Local Plan in 2015, however, it is recognised that there is more to be done in the area to manage the pressure of new development and protect the water environment of Chichester Harbour.

We will continue to work in partnership to ensure that the longer terms issues of groundwater infiltration are addressed.

This position statement seeks to manage smaller scale developments within the catchment. By limiting the increase in flows to the sewer network it is hoped that there will be a reduction in storm overflow releases from Apuldram WwTW. This in turn will limit the impact of the storm overflow on the water quality of Chichester Harbour.

# Support for Applicants on “no net increase in flows”

Further advice on how you may be able to achieve no net increase in flows to the sewer network are available in the Surface Water and Foul Drainage SPD. This should be demonstrated in a Drainage Impact Assessment submitted with any planning application.

Depending on the scale of development options may include:

* Removal of surface water from combined sewers;
* Retrofitting water efficiency measures on other development with the Apuldram WwTW catchment; and/or
* Offsetting existing flows from previous development.

For larger developments there may be opportunities to mitigate the impact of additional flows by rerouting other parts of the city to the Tangmere pipeline when this is operational.

Discussions should be had with Southern Water at the earliest opportunity.

# Review Date

We will monitor the implementation of this position statement on the water environment of Chichester and how the Apuldram WwTW operates. We will seek to review it on an annual basis or as a result of additional evidence which may affect this current position.

December 2018