

**Position Statement on
Wastewater and Delivering Development in the
Local Plan
(Apuldram Wastewater Treatment Works)**

July 2014

This background paper/position statement is a continuation of the background paper (Water Quality and Strategic Growth for Chichester District) written in November 2012 to inform the Local Plan Key Policies Preferred Approach and the Position Statement on Wastewater and Delivering Development in the Local Plan (January 2014).

1. This update relates particularly to the Council's position with regard to future planned growth and existing capacity at **Apuldram** wastewater treatment works.
2. The Water Quality Group agreed to use the certified (MCERTS) measured flows averaged for all the 7 years available for the WwTW in the District, except for Apuldram which only has MCERTS data for four years so uses from 2009. This was agreed to be the best way forward for estimating the Dry Weather Flow (DWF) headroom at each wastewater treatment works.
3. Irrespective of the DWF methodology, due to the infiltration/environmental issues at Apuldram a more robust way of monitoring the headroom has been established to deliver the Chichester Local Plan: Key Policies 2014-2029 (CLP). Monitoring of the other WTW in the district remains unchanged.

Apuldram (Chichester) WwTW

5. In August 2010, the Environment Agency issued a Position Statement advising the Council to refuse residential development if it would result in a significant increase in the net flow to the sewer network. In September 2013, the Environment Agency withdrew its position statement and following the installation of UV treatment on the storm overflow in April 2014, a headroom of 770 dwellings was released. However, development beyond this headroom could have a significant impact on the nitrogen loads and weed growth in the Harbour and therefore the release of this headroom has been limited to 770 dwellings. Monitoring work has been undertaken to ensure capacity remains to deliver the CLP and enable growth within the City, Fishbourne, Donnington and Apuldram Parishes.
6. This updated Position Statement assessed the headroom available using the estimated existing headroom of 770 as the base data minus planning applications that have been granted permission and planning applications received and under consideration to 20th June 2014. Sites of 6+ units granted permission during August 2010 – 16th September 2013 have been excluded as applicants would have had to demonstrate that there would be no significant increase in the net flow to the sewer network. Planning permissions prior to 31st July 2012 have also been excluded as this information has been included previously in assessing the headroom.
7. The allocation of Parish numbers from the CLP has been added to the table with the information that has been considered in assessing the headroom for Apuldram.

8. There is estimated headroom for 159 dwellings to connect to Apuldram WwTW, over and above the allocation in the CLP. With an average windfall delivery rate of approximately 100 dwellings per year in Chichester City allowing development on greenfield sites would erode the remaining headroom and prevent development from occurring on brownfield sites within existing settlements. Therefore it is considered appropriate to refuse planning permission on greenfield sites, if intended to utilise the treatment facilities at Apuldram, in favour of retaining the existing headroom for brownfield development.

Table 1 – Apuldram WwTW

Monitoring Data	A - Estimated existing headroom (households) at July 2012	B - Local Plan Parish Numbers Fishbourne (50)	C - Local Plan Chichester City North 130	D - Local Plan Chichester City allocation (150)	E - Local Plan Chichester City windfall	F - Subtotal (B+C+D+E)	G - Remaining capacity (A-F)
	770						
Number of dwellings committed to 31 st March 2013	176						
Sub total	594					0	594
Sites in Fishbourne with permission from 01/04/2013 – 20/06/2014		28					
Sites in Chichester (1-5 units) with permission from 01/04/2013 – 20/06/2014					45		
Sites in Chichester (6+ units) with permission from 01/04/2013 – 20/06/2014				17			
14/00733/EIA Land south of Graylingwell Drive, Chichester (original allocation of 130 dwellings)			175				
14/02070/PE Land rear of Romans Mead Estate, Mosse Gardens, Fishbourne (Neighbourhood Plan allocation)		30					
Planning applications (1-5 units) received and under consideration to 20/06/2014					7		

Planning applications (6+ units) received and under consideration to 20/06/2014				29			
Sub total	594	58	175	46 (+ 104)*	52	435	159

* The Local Plan allocates a parish number for Chichester City of 150, 104 remains to be delivered

Steve Carvell and Amanda Jobling
Chichester District Council
East Pallant House
1 East Pallant
Chichester
West Sussex
PO19 1TY

Our ref: Chichester PS

Date: 16th September 2013

Dear Steve and Amanda,

Environment Agency Position Statement – Planning and Wastewater Treatment

Further to conversations with your officers I am writing to confirm that we wish to withdraw our position statement “Wastewater treatment capacity constraints on new development in Chichester city” dated August 2010 and its addendum dated September 2011.

Our Position Statement was published due to concerns with storm discharges from Apuldram Wastewater Treatment Works (WwTW). As you will be aware through the Chichester Water Quality Group we have been working with yourselves and other partners to address this. One of the outcomes will be the installation of ultra-violet (UV) treatment on the storm overflow to mitigate its impact on the Harbour. It is expected that this will be operational from spring 2014.

The main discharge from the Apuldram WwTW is already subject to UV treatment. Installing this type of treatment on the storm overflow will reduce the bacteria levels entering the Harbour but will not address the nitrogen load.

It is accepted by both the Environment Agency and Natural England that the total discharge from the storm overflow is likely to be having a significant effect on the European designated site at certain times.

We are continuing to work with our partners through the Chichester Water Quality Group to address this and have issued Southern Water with an enforcement notice under the Environmental Permitting Regulations. The enforcement notice introduced a requirement for Southern Water to implement the proposed UV treatment plant on the storm overflow, imposed a schedule for reporting on progress of the sewer investigation programme and required the company to investigate the environmental impact of the storm discharge.

The Apuldram WwTW has some remaining headroom within its current permit. We have undertaken modelling work to understand the impact of releasing some of this headroom following installation of the UV treatment. This modelling has solely looked at the impact the extra headroom flow would have on the volume and frequency of discharges from the storm overflow and its impact on the nitrogen loading and subsequent weed growth in the Harbour.

The modelling demonstrated that the additional nitrogen discharged through the storm overflow when a flow of 385 m³/day is added to the WwTW would have an insignificant impact on weed growth. In discussion with Natural England we have agreed that this headroom could be made available for development that would be occupied once the UV treatment is operational.

A volumetric headroom of 385 m³/day equates to approximately 700 dwellings. We would recommend that you have discussions with Southern Water as to how you monitor any planning permission granted.

Any development beyond this headroom, under current catchment conditions, would have a significant impact on the nitrogen loads and weed growth in the Harbour. Once this headroom is reached we would therefore revisit our position and may reinstate our current advice to refuse development that results in a significant increase in the net flow to the sewer network.

We would advise any planning permission granted within this catchment to be conditioned for occupancy following the operation of the UV treatment on the storm overflow. We will work with your officers to agree consultation arrangements and specific wording for conditions.

I trust that the above sets out clearly our current position regarding development in the Apuldram WwTW catchment. If you would like to discuss anything in more detail please do contact me.

Yours sincerely,

Hannah Hyland
Sustainable Places – Planning Specialist