

## **Environmental reasons to curtail new development in Middleton-on-Sea, with evidence base**

Version	1
Date	13-10-2022
Authorised	CRH
Revisions	

No.	Environmental reason	Evidence base
1	Water supply resources are already under stress with a significant water supply-demand deficit in the region, under drought conditions, that is getting worse.	Portsmouth Water. Revised Water Resources Management Plan 2019. June 2021.  Further, Southern Water imposed a hose pipe ban in West Sussex in 2022.
2	The combined licenced abstraction of the water sources that feed Middleton-on-Sea will reduce significantly in a few years' time, contrary to any increased demand from new development.	Portsmouth Water. Correspondence dated 14 <sup>th</sup> January 2022 from Simon Deacon, Catchment & Environment Manager.
3	An increase in water supply demand from new development will require the water supply infrastructure to be substantially upgraded, including treatment and pumping capacities.	Portsmouth Water. Correspondence dated 14 <sup>th</sup> January 2022 from Simon Deacon, Catchment & Environment Manager.
4	Without substantially upgrading the water supply network, new development may lead to loss of pressure, reduced continuity of supply and the exacerbation of water discolouration (due to more variable flow and the disturbance of deposits in the mains).	Personal communication from Cllr. Dr C R Hayes based on 40+ years' experience in water & environmental management, including 15 years in Anglian Water Authority.
5	The sewer network is already hydraulically overloaded and will need to be substantially upgraded.	Southern Water. Correspondence dated 5 <sup>th</sup> January 2022.  Southern Water. Baseline Risk & Vulnerability Assessment, 2022.
6	The capacity of sewage pumping stations is not known so the impact of more sewage cannot be determined.	Southern Water. Correspondence dated 5 <sup>th</sup> January 2022.

7	There are already problems with sewage flooding that will be made worse by the additional sewage from new development.	Arun Local Plan 2011-2031 (July 2018), paragraph 18.2.6.  Southern Water. Baseline Risk & Vulnerability Assessment, 2022.
8	The problems with the sewer network have led to environmental pollution that will be made worse by the additional sewage from new development, contrary to regulations under the Water Framework Directive, which do not permit deterioration in water quality.	Arun Local Plan 2011-2031 (July 2018), paragraph 18.2.6  Southern Water. Baseline Risk & Vulnerability Assessment, 2022.  The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.  Environment Agency. South East River Basin Plan. Ryebank Rife Water Body, 2021.
9	Southern Water have determined very significant risks, in the two sewage treatment catchments that serve Middleton-on-Sea, associated with storm overflow performance, nutrient neutrality and bathing waters.	Southern Water. Baseline Risk & Vulnerability Assessment, 2022.
10	Most of the northern part of the Parish of Middleton-on-Sea has a high risk of groundwater flooding, with a 50 to 75% probability.	Arun District Council. Flooding risk assessment for groundwater. Index Number ADC_13, June 2016.
11	The Environment Agency's fluvial and tidal flooding risk assessment indicates higher risk categories zone 2 and zone 3 flood risks, with up to 25% probability, associated with a broad area bordering Ryebank Rife and the ditches that feed it.	Environment Agency. Risk assessment for fluvial and tidal flooding. 2021.  Arun District Council. Flooding risk assessment for surface waters. Flood zones. June 2016.
12	The very high water table, particularly in the wetter winter months, is a major cause of the very high infiltration of sewers and facilitates the movement of surface water pollution, making localised containment difficult.	Southern Water. Correspondence dated 5 <sup>th</sup> January 2022 refers to 44% infiltration of sewers.