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Thursday, 29 September 2022

Dear Wealden District Councillor,

Redrow Homes - Hesmond's Stud Detailed Planning Application WD/2022/0341/MAJ

**Village Concerns Objection 16 -
Proper Consideration of Sewage Issues**

1. We are writing to you as the Co-Chairs of Village Concerns, a local Action Group from East Hoathly with Halland Parish. We represent the views of over 200 supporters against the overdevelopment of our Parish.
2. Wealden District Full Council approved a motion in July this year to properly consider sewage spill data within the planning process when looking at potential new housing developments. We were delighted that you took this decision, it is something that we have been trying to get the planning department to consider for 6 years.
3. The Hesmond's application for 205 homes was deferred in August, in order that the sewage issue could be properly considered. A meeting was held between Wealden and Southern Water on Monday 26 September. No outcome has been published but within hours of the meeting taking place, the planning department had put the Application back onto the Agenda for consideration by PCS on 6 October.
4. The Officer's Report again recommends approval. It notes that the Application was deferred for proper consideration of the sewage issues but has no reference to what the outcome of the proper consideration was. It does now include a vague reference to "necessary upgrading work" but no explanation of what this is, when it would be done, how long it would take, what it would cost and who would pay for it.
5. The sewage issues affecting this Application are twofold:

Treatment Plant Capacity

a. The Sewage Treatment Plant already cannot cope with the existing sewage flows:

	Storm Overflows		Hours Overflowing		Days exceeding 6 mm Rain
	2020	2021	2020	2021	
East Hoathly Sewage Treatment Plant	41	46	416	593	66

b. The Government Storm Overflow Evidence Project¹ states that “overflows are designed to operate infrequently and as the result of heavy rainfall and this is the basis of their environmental permits”. The report fails to define what heavy rainfall is. Met Office data for East Sussex for the years 2020/21 indicates that there were on average 115 days of rainfall per year and most of these rainfall days are minor, not amounting to “heavy rainfall”. The number of days when rainfall exceeded the very modest amount of 6mm of rain in 24 hours amounted to 66 days. It is quite clear that the East Hoathly Sewage Plant overflows almost every day that it rains more than 6 mm of rain. The number of overflows is increasing as is the duration. Any addition of new homes will make this worse and 205 (plus 55 homes from another approved development) added onto the existing 380 homes will make it massively worse.

Sewer Pipe Capacity

c. The sewer pipework is old and in poor condition, but more fundamentally it has been added to significantly since it was first installed in the late 1950s and cannot cope with existing loads. The existing pipes initially serviced 130 homes but now have to cope with 380 homes. The proposal to add another 205 + 55 homes will simply not work.

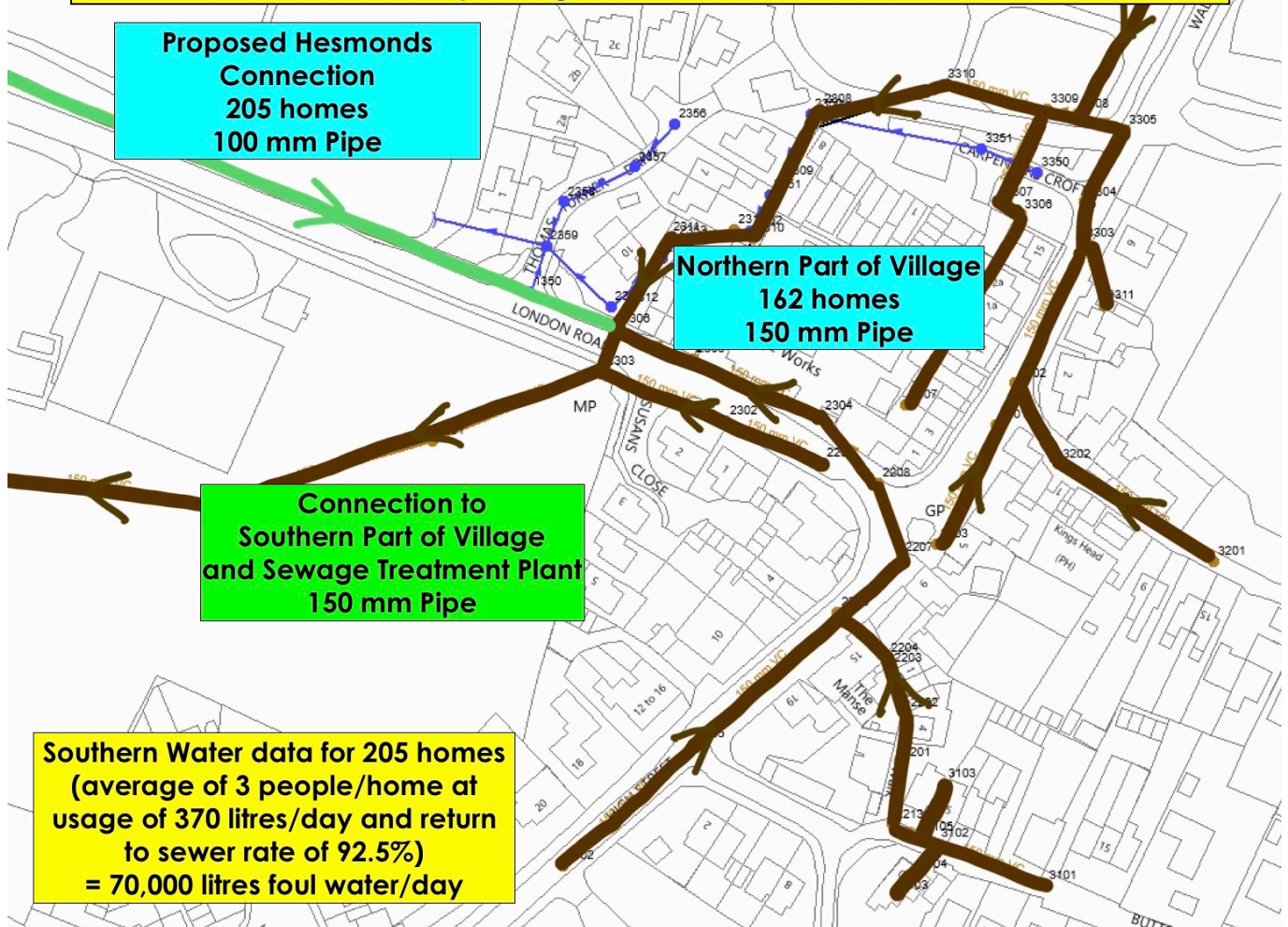
d. The diagram below shows a simple depiction of why the proposal will not work without major infrastructure upgrading.² The site is lower than the existing sewer so the plan is to store each days waste on site and then pump it into the main sewer overnight. The tanker shown below has a capacity of 35,000 litres, so two of these would be required to store the daily foul water from the proposed development. The space allocated for this on the site is inadequate and there is no detail of the operational plans. What happens if it is raining heavily at night and the sewer cannot take the

¹ Stantec/Water UK - Storm Overflow Evidence Project - Nov 2021

² <https://www.southernwater.co.uk/account/average-water-use-and-cost>

additional load from the pumping operation ? What happens if the pumps fail or there is a power cut and the tanks are full ?

The proposed Hesmonds connection would store sewage in tanks and pump it uphill, on a daily basis, into the main sewer. No details have been provided of the proposed storage facility, no designs, fail safes, no operational procedures and most importantly no operating and maintenance costs.



6. We believe that without a significant upgrade of the Sewage Treatment Plant and the the Sewage Pipes, the result will be more overflows of raw sewage into our watercourses and more sewage backing up into peoples homes and gardens.

7. Please do what you can to get the planning department to take seriously, your Motion to give proper consideration to this issue. The Planning Department should not be pressing ahead before the outcome of the meeting with Southern Water has been reported to the Council and the Council are happy with the outcome. It would also be good if the outcome of the meeting could be made public. They should defer their decision until the full implications for this community are known, planned and costed. If you wish to explore the myriad other reasons why this is an appalling planning application please visit our website at <https://villageconcerns.co.uk/index.html>

Katherine Gutkind and Kathryn Richardson
Co-Chairs
Village Concerns