

Response of Ringmer Parish Council to the Southern Water DWMP consultation September 2022

We would like to thank the members of your staff who recently attended a meeting with Ringmer Parish Council to discuss the unacceptable performance of the Ringmer (Neaves Lane) WWTW. Unfortunately Ringmer Parish Council learned of your 12 week DWMP consultation only shortly before the consultation deadline, but we hope that our response below will nevertheless be taken into account.

Ringmer Parish Council recognises:

- That where (as at Ringmer Neaves Lane) Southern Water WWTW accept rain water as well as foul sewage, there will inevitably be “storm overflows” in truly exceptional weather.
- That exceptional weather may become more frequent because of climate change.
- That these problems are historic in nature, in that much 20th century and earlier development was allowed to discharge both rain water and foul sewage into the same sewers.
- That while in most 21st century development rain water is separated from foul sewage and discharged separately via SUDS systems, it is extremely challenging, perhaps impossible, to retrofit such systems to existing high-density development. This is especially true where, as in Ringmer, the existing housing is largely built on impermeable gault clay.

Ringmer Parish Council expects Southern Water to recognise:

- That the incidence of “storm overflows” at many of its Sussex WWTWs has been allowed to increase over the years to far higher levels than the incidence of weather that can reasonably be considered a storm.
- Despite significant investment at the Ringmer (Neaves Lane) WWTW in 2019, the 2021 data provided by SW to the Environment agency reported that there were 68 releases during the year, with an average duration such that this WWTW was discharging untreated sewage into our watercourses for more than 10% of the time.
- During 2021 the number of such discharges was far higher than the number of occasions on which Ringmer experienced anything that could reasonably be considered a storm. The reality is that “storm overflows” from Neaves Lane occur every time there is even moderate rain.
- It is of little benefit to make expensive investment in reducing phosphate discharges during the periods when the WWTW is working normally, if for over 10% of the time all the phosphate produced by a community of almost 5,000 people is being discharged without treatment.
- That if the EA permits “storm overflows” with such astonishing frequency, then that should be a cause of shame for the EA. This is certainly not the service that your Ringmer customers believed they were paying for through their substantial water bills, and it is not a level of service that they consider acceptable.
- That in the past SW has been guilty of perpetuating and exacerbating the problem by keeping secret the frequency and magnitude of these “storm overflows”, of which SW must surely have been aware, and by giving misleading advice to planning authorities about the consequences of additional development in the areas served by malfunctioning WWTW such as Neaves Lane. It appears that the decision to monitor and report publicly the extent of these “storm overflows” was made only in response to new central government requirements.
- That SW claims that the discharge of untreated sewage during “storm overflows” is immaterial because it is highly diluted, typically 95-97% rainwater, are as sensible as claims that beer can be considered non-alcoholic, because it is typically 95-97% water. This claim is especially misleading

for those WWTW that most frequently suffer “storm overflows”, where the sewage content is likely to reach wine or even spirit levels.

- That while the Ringmer (Neaves Lane) WWTW is one of your poorer performers, there are at least a few others that are even worse!
- That in your current (AMP7) investment period, covering the period to 2025, there appear to be no plans for further investment at Neaves Lane to ameliorate the current situation.
- That your published objective of reducing storm overflows by 80% by 2030 will not be achieved without substantial investment during the forthcoming AMP8 investment period that runs to 2030, to which your recent consultation relates.

Ringmer Parish Council therefore makes the following comments for your consultation:

- You should have **consulted far more widely** about your future DWMP investment plans. This consultation should have included all Town and Parish Councils in your area. This would have improved the response rate, and brought this important project to the attention of a much wider audience.
- To achieve your stated target it is essential that there should be substantial investment before 2030 in reducing “storm overflows” from all those WWTW, including specifically the Ringmer (Neaves Lane) WWTW, that discharge untreated sewage other than in truly exceptional weather. Ringmer Parish Council is outraged by the table in your consultation papers that reports accurately the very poor performance of this WWTW but then assesses this as of “Low concern”. **We regard this as astonishing and completely unacceptable complacency.** No performance bonuses should be paid to any members of SW senior staff until this target has been met.
- **It is essential that in future SW is open and honest** about its performance with all its customers and with other authorities and partners. Ringmer Parish Council has seen in 2022 an assurance from Southern Water to Lewes DC that there is “adequate headroom” at the Ringmer (Neaves Lane) WWTW to accept additional sewage from a proposed new Ringmer development. Questioning your staff at our recent meeting, it was established that this statement was based only on dry weather sewage flows to the WWTW. That crucial qualification does not appear in your comment, and was not understood by the planning officers that received it. As rainwater and foul sewage are separated in new development, the new development will not increase significantly the frequency of “storm overflows”, but it will increase the amount of pollution that is released at each event. This is a material planning consideration under both national and local planning policy and Southern Water should in future be open and honest about the consequences.
- There is a second, small, WWTW in our parish, the Ringmer (The Holdings) WWTW. This appears from the tables in the DWMP consultation papers to be operating perfectly, with no “storm overflows” at all. Most of the other very small WWTWs have similar perfect performance. This table should distinguish between those WWTW that are in fact operating perfectly, and those whose performance is unknown, because it is not currently being monitored.