

Shoreham Cement Works Area Action Plan Shoreham Road, Upper Beeding

## Foul Water Drainage Strategy

South Downs National Park Authority





## **Document Control Sheet**

Shoreham Cement Works Area Action Plan Shoreham Road, Upper Beeding South Downs National Park Authority

This document has been issued and amended as follows:

Date	Issue	Prepared by	Approved by
17.12.2021	DRAFT	JM	NJ
11.02.2022	DRAFT	JM	NJ
11.03.2022	FINAL	JM	NJ

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- Appendix A Development Area and Proposed Foul Drainage Strategy.
- Appendix B Existing Drainage.
- Appendix C Historic as-built records of Shoreham Cement Work existing drainage.
- Appendix D Southern Water wastewater and clean water records



### **1.0 INTRODUCTION**

- 1.1 This Foul Water Drainage Strategy has been prepared on behalf of the South Downs National Park Authority (SDNPA) in support of providing a programme of works for drainage investigations to support the four development scenarios being considered for the Shoreham Cement Works site in West Sussex. The report will inform the preparation of the Shoreham Cement Works Area Action Plan (AAP) currently being prepared by the SDNPA.
- 1.2 Motion have been appointed to assess existing drainage information from the landowner and details regarding working cesspit and foul sewers, provide a drainage strategy for each of the four areas of the site (detailed on the drawings in **Appendix A**), and to provide indicative costs for site development and as part of this work will undertake the following.
  - ▶ Foul water drainage strategy for site's A, B, C & D
  - Obtaining sewer records and other available information on the existing foul water drawing, including obtaining landowner's drainage plans.
  - > Developing preliminary foul water drainage strategy for the 4 sites.
  - Assessing preliminary foul flows from the mixed-use development based on details on floor areas, scale and number of units provided by the client.
  - > Obtaining preliminary details of a sewage treatment works for the site.
  - > Production of foul drainage strategy drawings and section in the overall report.
  - Produce a budget cost estimate for the main foul drainage infrastructure required to service the proposed development sites (sites A, B, C & D).

Motion presents conclusions and recommendations based upon these assessments within this report.

### Limitations

1.3 The purpose of this report is to contribute to the Area Action Plan and enable the SDNPA to make informed decisions regarding future planning applications. It does not constitute a design, and the calculations and information produced cannot be used for design purposes.

### **Sources of Information**

- JBA Consulting Shoreham Cement Works Area Action Plan Evidence Base Studies Preliminary Geotechnical and Geo-Environmental Assessment (2018)
- ▶ CGL site walkover survey on 19<sup>th</sup> November 2021.
- AVER Decommissioning & Environmental Ltd HAZARDOUS MATERIALS (CHEMICAL) and DEMOLITION COSTINGS SURVEY At SHOREHAM CEMENT WORKS UPPER BEDDING WEST SUSSEX BN44 3TX ISSUE: ONE REFERENCE: REP202-1 Rev 0.0 PROJECT NO: D202 DATE OF ISSUE: 22 NOVEMBER 2021.
- CGL SHOREHAM CEMENT WORKS. Programme of Works Report for Land Contamination, Removal of Existing Buildings and Drainage Investigations.
- Waterwise A review of Water Neutrality in the UK, funded by Anglian Water, Southern Water, Thames Water and Scottish Water – January 2021
- Sussex North Water Resource Zone Source: West Sussex County Council.



- Drainage and Wastewater Management Plan (DWMP) Adur and Ouse River Catchment -DRAFT report from Southern Water.
- Natural England's Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach.
- ▶ Southern Water New Connections Services Charging Arrangements 2021-22 –January 2021 v2.
- Ofwat New Appointments and Variations Website. <u>https://www.ofwat.gov.uk/regulated-companies/markets/nav-market/nav-publications/</u>
- Environment Agency General Binding Rules for Sewage Discharge to Surface Water. Gov.uk Website. <u>https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water</u>
- Southern Water Drainage and Wastewater Management Plan (DWMP) Adur and Ouse River Catchment -DRAFT report <u>https://www.southernwater.co.uk/media/3855/adur-and-ouse-dwmp-strategiccontext.pdf</u>
- British Water Code of Practice Flows and Loads 4 Sizing Criteria, Treatment Capacity for Sewage Treatment Systems.



### **2.0 SITE DESCRIPTION**

- 2.1 The site is located at Shoreham Cement Works, Steyning Road, Upper Beeding, BN44 3TX. The National Grid reference for the approximate centre of the site is TQ 20215 08715. The site is bounded to the west by the River Adur.
- 2.2 The site occupies an area of approximately 44 ha. This section will describe the Shoreham cement works site summarising information from the previous reports by JBA Consulting<sup>1</sup> and a combined LiDAR and topographic survey from 2017 as well as observations made during a site walkover survey by CGL. This will include information on the topography, geology, and land-use.
- 2.3 Shoreham Cement Works is a 44-hectare site that includes an inactive chalk quarry and semi-derelict works. The site is located about 5km to the north of Shoreham and 2km south of Upper Beeding village, on each side of the A283. It is bounded to the west by the River Adur and farmland in the floodplain, to the north by chalk grassland, and to the south and east by farmland. Immediately to the north on the A283 are 40 Edwardian terraced houses (Dacre Gardens) which were built to house workers at the cement works, together with an infill development of 10 flats.
- 2.4 The Shoreham Cement works site is located in West Sussex, 2.1km north of Shoreham by Sea and 1.2km to the south of upper beeding, adjacent to the River Adur. The site is split across the A283, Steyning Road, and the land use comprises a former cement works and associated chalk quarries which are currently not in operation.
- 2.5 The site is split into 4 sub-areas named A-D as follows. A plan showing the development areas is included in **Appendix A**.
  - Area A is located east of the A283, alongside the River Adur. This section is triangular in shape and approximately 7 hectares. In the northern and western portion of area A, there are hardstanding and buildings, whereas the south-eastern portion is occupied by an earth mound (understood to have been deposited as part of the A283 construction). It is understood that the southern buildings are the former workshops associated with the railway sidings and cements works, and that a buried fuel tank is located adjacent to these buildings. It is understood the earth mound was created from the A283 realignment works, with the original route of the A283 still evident in this area.
  - Area B is the first area to the east of the A283 and comprised of much of the old cement works buildings, kilns and processing areas, within a former chalk quarry. The quarry walls are present to the north and south of the main buildings, at approximately 25 to 35m in height. The yard area to the north of the buildings is currently used for storage purposes by the Client. Chalk spines form the eastern boundary of Area B which are remnants of a former quarry wall penetrated by cement processing buildings, and provide access into Area C.
  - Area C Area C is formed by a large, roughly circular chalk quarry. Within this circular area the floor level is variable having been infilled with material. There are also several mounds of material some associated with the current land use as an inert waste recycling facility, others appearing to be historical in nature. This area can be accessed between the chalk spines along the western boundary that also has some old processing plant and gantries connecting to the main works in Area B. The ground levels adjacent to the chalk spines are around 13.0mOD. The lowest floor levels are in the north-eastern corner at around 11mOD. The highest floor levels are in the north-western corner at around 25mOD. Chalk quarry walls of varying height form the southern and eastern boundaries, from 30m to 85mOD. There are three main quarry benches along the northern and north-eastern boundaries, elevations of each bench are approximately 26mOD, 38mOD and 48mOD with the quarry

<sup>&</sup>lt;sup>1</sup> JBA Consulting - Shoreham Cement Works Area Action Plan - Evidence Base Studies - Preliminary Geotechnical and Geo-Environmental Assessment (2018)



edge at approximately 65mOD on the northern area boundary. The quarry edge ascends in an easterly direction and descends in a westerly direction. These benches were formerly used, via switchbacks, as a haul route connecting to Area D to the east.

Area D - is a rectangular quarry area located in the eastern portion of the site. Ground levels rise from approximately 44mOD at the western edge, ascending in a series of slopes and benches to approximately 73mOD adjacent to the eastern most quarry wall. Quarry edge levels are approximately 113mOD at the north-east corner, reducing to approximately 105mOD at the south-east corner and 82.5mOD at the south-west corner of this area. Quarry walls in this area are approximately 30 to 40m in height.

### Site Areas and Topography

- 2.6 The ground elevation across Area A ranges from approximately 4 m Above Ordnance Datum (mOD) to 9mOD east to west, 5mOD to 12mOD east to west across Area B, 11mOD to 65mOD in Area C, and 44mOD to 113mOD in the far east across Area D. To the east of the A283 the site is within a hollow surrounded by the steep quarry sides to the north, south and east. A ridge of Chalk up to approximately 40mOD extends from the north and south quarry walls to the east of the cements works buildings in Area B and forms a partial enclosure of Area B moving through to Area C.
- 2.7 Prior to Chalk extraction, the site would have formed a ridge of high ground, falling in a westerly direction towards the river, separating dry valley features to the north and south.

Site Area	High Point (mAOD)	Low Point (mAOD)	Area (ha).
A	24.10	4.75	5.45
В	15.00	7.50	5.75
С	12.00	44.00	18.95
D	116.00	43.79	11.82

### Table 2.1: Site areas and topography

2.8 The topographic survey and Lidar levels can be found on the drawings included in Appendix A.



### **3.0 EXISTING SITE DRAINAGE**

- 3.1 There are historic as-built drawings for the Cement Works dating back to 1952, which shows that the Cement Works has or had an existing foul and surface water drainage infrastructure. This infrastructure is located in the development Areas A and B, and in the proximity of the Cement Works buildings and this was / is the foul and surface water system for the existing buildings and offices. The existing drainage infrastructure is shown on the existing drainage drawing included in Appendix B, and includes the following.
  - Separate foul and surface water drainage systems of pipes and manholes.
  - 3 No. surface water and 1 No. foul water piped crossing of the A283 Shoreham Road. 2 No. surface water crossing are likely to run through a tunnel that runs below the A283.
  - A Pumping station
  - A surface water outfall to the River Adur via a headwall in Area A.
  - Primary foul treatment in the form of a settling tank and filter bed.
  - > 1 No. outfall to the River Adur for the treated effluent (small sewage discharges) to surface water.
  - Secondary foul water treatment in the form of a Septic Tank which is connected to a soakaway for the small group of building in Area A.
- 3.2 The CGL report<sup>2</sup>, states that the are a number of discharge consents nearby related to Dacre Gardens to the north and it was noted from historic as-built records (Appendix C), that there is a possible discharge to the river from the sewage treatment plant in the northern part of Area A.
- 3.3 The historic as-built records indicate that the site benefits from an existing permit to discharge of treated effluent to the River Adur, which is subject to the Environment Agency general binding rules for small sewage discharge to surface water. The existing foul system serves the existing buildings and offices is classed as a small sewage discharge of less than 5,000 litres a day, and this could feasibly be used to drain a small portion of site, however this would be a small percentage of the post development total flows, which is measured in 100,000's (see Chapter 6 for development foul loadings). This existing discharge could not be used for the whole development site as the EA binding rules state that an increase to more than 5,000 litres a day requires a new discharge consent and a bespoke permit; however the fact that there is an existing discharge could be a factor should the EA receive an application for new discharge to the River Adur.
- 3.4 A drawing of the existing drainage for the Shoreham Cement Works site is included in **Appendix B**, which is based on the information from the historic as-built records source materials provided by the site owner, which are included in **Appendix C**.

<sup>&</sup>lt;sup>2</sup> CGL SHOREHAM CEMENT WORKS. Programme of Works Report for Land Contamination, Removal of Existing Buildings and Drainage Investigations.



### 4.0 SEWER AUTHORITY

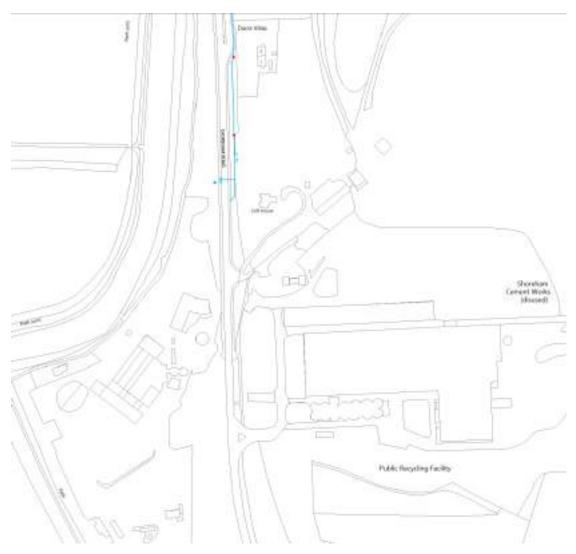
4.1 The water authority for this area is Southern Water and the clean water and sewer records have been obtained for the site and the surrounding areas.

#### **Clean Water**

4.2 The clean water records show that there are no water authority clean water mains that serve the Shoreham Cement Works site. There are no water mains running in Shoreham Road or Steyning Road immediately adjacent to the Cement Works. The nearest water main to the site is in Shoreham Road to the north of the site at the neighbouring property cliff house, which appears to be part of the water supply network that services Dacre Villas and properties to the north towards Upper Beeding. The water supply for the cement works is likely to be obtained from a water abstraction point (as discussed in the CGL report<sup>3</sup>).

<sup>&</sup>lt;sup>3</sup> CGL SHOREHAM CEMENT WORKS. Programme of Works Report for Land Contamination, Removal of Existing Buildings and Drainage Investigations.





#### Figure 4.1: Southern Water clean water records extract

#### Wastewater

- 4.3 The wastewater records shows that there are no Southern Water adopted foul or surface water sewer that serve the Site. There are no adopted sewers running in Shoreham Road or Steyning Road in close proximity to the Site.
- 4.4 The Site is located in the Adur foul water catchment area and the management of wastewater in the catchment area is cover by Drainage and Wastewater Management Plan (DWMP) Adur and Ouse River Catchment -DRAFT report from Southern Water<sup>4</sup>. Figure 2 in this report is a map of the Adur and Ouse Catchment, which shows that the site lies between the catchment areas for the Shoreham Wastewater Treatment Works (WTWs) and the Steyning wastewater treatment works.

<sup>&</sup>lt;sup>4</sup> Southern Water Drainage and Wastewater Management Plan (DWMP) Adur and Ouse River Catchment -DRAFT report <u>https://www.southernwater.co.uk/media/3855/adur-and-ouse-dwmp-strategiccontext.pdf</u>







4.5 The Shoreham WTW catchment (ref. Port) which includes Brighton and Hove, and Shoreham by Sea serves a much larger area and population than the smaller Steyning WTW catchment (ref. Stey).

**Table 4.3: Sewerage Catchments** (Source: Drainage and Wastewater Management Plan (DWMP)

 Adur and Ouse River Catchment -DRAFT report from Southern Water Table 1)

Sewer Catchment Ref	Sewer Catchment Name	Communities Served	Population Equivalent Served	Length of sewer (km)
PORT	Shoreham	Brighton, Portslade, Shoreham by Sea, Southwick, Hove, Lancing, Fishergate	54,577	408.670
STEY	Steyning	Steyning, Bramber, Upper Beeding, Ashford	9,223	76.796

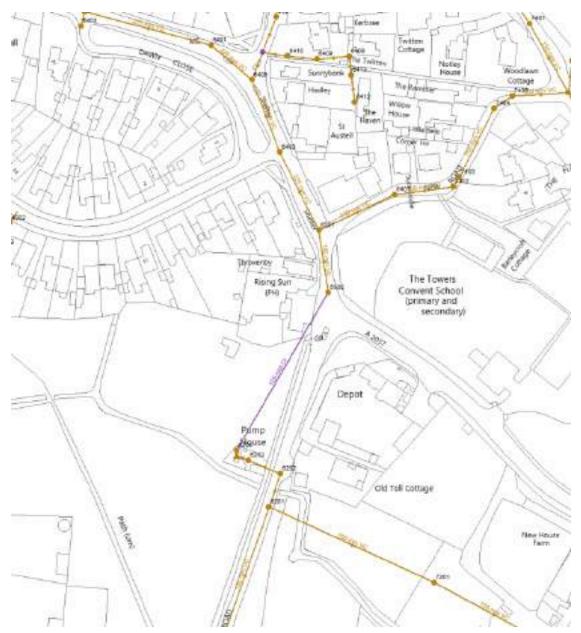
4.6 The nearest existing adopted foul drain to the site is located in the village of Upper Beeding to the north where there is a network or 150mm diameter foul sewer connected to a foul pumping station.

<sup>&</sup>lt;sup>5</sup> Southern Water Drainage and Wastewater Management Plan (DWMP) Adur and Ouse River Catchment -DRAFT report <u>https://www.southernwater.co.uk/media/3855/adur-and-ouse-dwmp-strategiccontext.pdf</u>



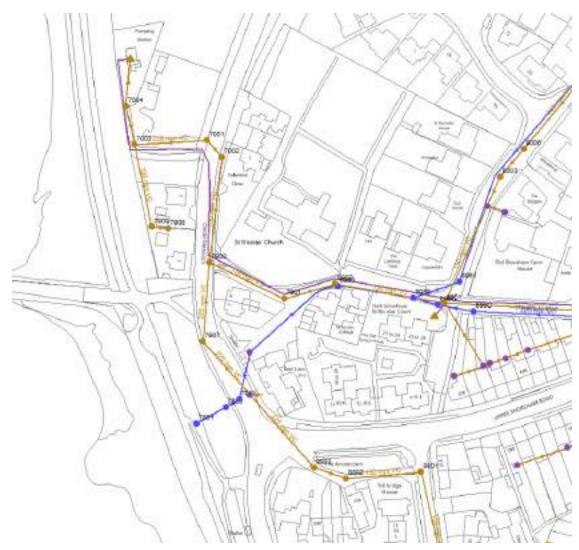
Approximately 1.9 km from the site there is an existing 225mm dia. Sewer located in the High Street (A2037) by Towers Convent School (primary and secondary) at MH ref. 6301 CL: 5.82 and IL: 3.95.

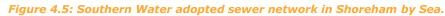




4.7 To the south of The Site in Shoreham and within the Shoreham foul catchment area there is existing foul sewer network located on the western edge of the Shoreham built up residential area. There is a 225mm diameter sewer network that drains to a pumping station. The pumping station pumps wastewater along Upper Shoreham Road where it is connected to a 300mm dia. gravity sewer which connects to the wider Shoreham by Sea sewer system and to a trunk sewer. The existing pumping station is located off Steyning Road at MH ref. 7004 CL: 3.250 IL: 1.350 and is located approximately 2.96 km from the Shoreham Cement Works site.



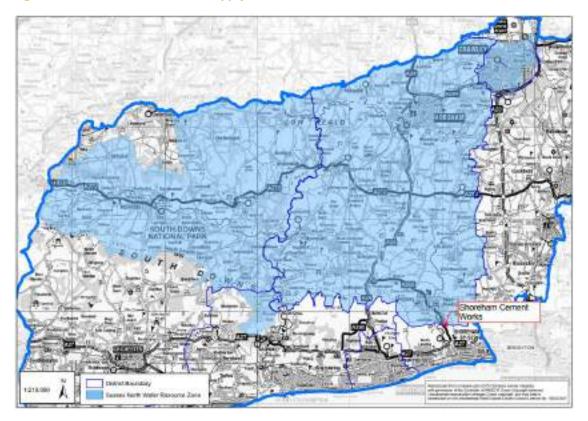




4.8 The Southern Water wastewater and clean water records are included in Appendix D.

### 5.0 WATER NEUTRALITY

- 5.1 Natural England has published a position statement for development applications within the Sussex North Water Supply Zone<sup>6</sup> where increased demand on the groundwater abstraction may have a negative impact on Special Area Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites in the Arun Valley Area. Applications within the Sussex North Water Supply Zone must demonstrate that they do not add to this impact and one way of achieving this is to demonstrate water neutrality.
- 5.2 Figure 5.1 below is a plan of Sussex North Water Supply Zone.



### Figure 5.1: Sussex North Water Supply Zone

- 5.3 The Shoreham Cement Work site lies partly within Adur District and Horsham District. This site appears to lie on the boundary of the Sussex North Water Supply Zone (SNWSZ) and therefore as it currently stands it is not clear if the site will not need to demonstrate water neutrality. This is due to the fluidity as to where the precise boundary of SNWSZ lies in relation to the site, as this depend on where you obtain the water supply from and if the water source is located in within SNWSZ.
- 5.4 There are financial, reputational, environmental and social benefits of water neutrality that could be consider as part of any future application. Water Neutrality and the benefits are considered in more detail in Waterwise A review of Water Neutrality in the UK Chapter 4<sup>7</sup>.

<sup>&</sup>lt;sup>6</sup> Natural England's Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach.

<sup>&</sup>lt;sup>7</sup> Waterwise A review of Water Neutrality in the UK, funded by Anglian Water, Southern Water, Thames Water and Scottish Water – January 2021



### 6.0 FOUL WATER DRAINAGE STRATEGY

6.1 Four development scenarios are currently being considered with varying development mixes of residential, employment, education, retail, sports and recreation and consumption food and drink. The foul loadings for each of the four development scenarios have been assessed based on typical site population figures derived using British Water Code of Practice Flows and Loads – 4<sup>8</sup>. Where Flows and Loads do not provide the information, for example such as the proposed population for Employment, the flows have been estimated based on a rate of 300 litre per day per 100 sq.m of commercial premises.

	Scer	nario 1	Scen	ario 2	Sce	nario 3	Scen	ario 4	
Description	Quantity	Foul Flows	Quantity	Foul Flows	Quantity	Foul Flows	Quantity	Foul Flows	
		(I/day)		(I/day)		(I/day)		(I/day)	
Dwellings (No.)	400	180,000	240	108,000	200	90,000	84	37,800	
Employment (Sq.m)	68,200	204,600	68,200	204,600	32,000	96,000	38,500	115,500	
Hotel (Sq.m)	7,500 (130	65,000	7500 (130	65,000	7500 (130	65,000	7500 (130	65,000	
	beds)		beds)		beds)		beds)		
Learning / non- residential institution (Sq.m)	2,000	3,003	2,000	3,003	10,000	15,015			
Retail (Sq.m)	280	540	280	540	280	540			
Indoor sports /					18,500	10,000			
recreation / fitness									
(Sq.m)									
Consumption food /					1,500	1,500			
drink (Sq.m)									
TOTAL FOUL LOADING		453,143		381,143		278,055		218,300	
(I/day)				501,145		270,000		210,000	
TOTAL FOUL LOADING		165.4		139.1		101.5		37.5	
(I/year)		megalitres		megalitres		megalitres		megalitres	
Assumptions and Clarific 1. Foul loadings are base		Nator Codo o	f Dractica El	owe and Load	c 1				
2. Residential dwelling l									
<ol> <li>Hotel loading is based</li> </ol>	-				nouse.				
4. Learning non-resident	-				R site areas	for 5 to 11 priv	mary school	Building Bui	lletin 10
lune 2014 Area guideline				cu on Annex		101 2 10 11 111	nary school	, building bui	neun 10
5. Indoor fitness and rec				and 50 litre	s/person/	dav.			
6. Retail is based on 6 fu					, persony	,.			
7. Consumption food / d				s/person/da	V				
				.,,,,,.					

### Table 5.1: Foul loadings for the 4 development scenarios.

8. Foul loadings to be confirmed when more details of the development is know, including the number of bedrooms per dwelling.

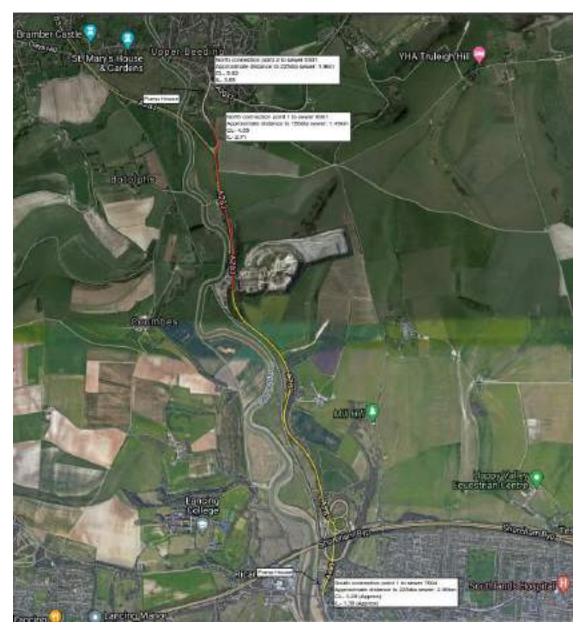
- 6.2 It is not currently known how the development scenarios and development numbers will be split between the areas of the site, however the basic principles of the foul drainage strategy of the site will be predominantly the same whichever development scenario or development area is selected.
- 6.3 The foul water drainage strategy for the site for all 4 development scenarios is that wastewater would drain by gravity from the high point in Area D, through areas C and B to the low point of the site in Area A by the River Adur. Then depending on which option is viable for the site, the site would either be connected to the existing sewer network by a new pumping station located on the site and a rising main,

<sup>&</sup>lt;sup>8</sup> British Water Code of Practice Flows and Loads – 4 Sizing Criteria, Treatment Capacity for Sewage Treatment Systems.



or a new WTW would be constructed on the site that would treat effluent and discharge the treated effluent to the River Adur. These two options and considered further in Section 7.0 of this report.

6.4 The nearest adopted foul sewer networks to the site are located in Upper Beeding to the north in the Steyning Catchment area and at the western extent of the Shoreham on Sea built up area by Steyning Road in the Shoreham Catchment area. The Upper Beeding foul sewer network is located approximately 1.9 km from The Site and the Shoreham foul sewer network is located approximately 2.96 km from the site.





#### **Environment Agency**

6.5 The Shoreham Cement Works site has existing small sewage discharge to surface water and to ground water that is regulated by the Environment Agency (EA) and for which the site will have an existing



consent and discharge permit. This will be subject to the EA General Binding Rules for the discharge of waste to a watercourse or to the ground<sup>9</sup>.

- 6.6 An option has been considered in the foul drainage strategy to look at the viability of locating a new wastewater treatment works (WTW) on the site which would treat the wastewater discharge on site, and which would require a new discharge to the River Adur.
- 6.7 For small sewage discharges to surface water the EA would expect compliance with their general binding rules, which states that if you discharge more than 5 cubic metres a day you must connect to the public sewer when it's reasonable in terms of distance to do so. The EA advice states that reasonable distance from the site to the nearest public sewer is calculated as follows.
  - Multiply the number of houses by 30m.
  - If some or all of the discharges is from non-domestic properties, divide the maximum volume in cubic metres that you want to discharge from those other premises by 0.75 and then multiply the result by 30, which will give the result in metres.
  - Scenario 4 has the smallest total discharge of 218.3 cubic metres (Table 5.1).
  - 218.3 x 0.75 x 30 = 4.91 km.
- 6.8 The site cannot meet the EA general binding rules as the boundary of the Site is less than 4.91 km from a public foul sewer.
- 6.9 The EA binding rules (17) states that a discharge point cannot be in or within 500 metres of any of the following:
  - SSSI
  - Special protection areas
  - Special areas of conservation
  - Ramsar wetland sites
  - Designated bathing water
  - Protected shellfish water
  - Freshwater mussel population
  - > 200 metres of an aquatic local nature reserve
  - > 50 metres of a chalk river or aquatic local wildlife site
- 6.10 The Shoreham Cement Works site lies within 500m of the Beeding Hill to Newtimber SSSI.
- 6.11 Any discharge of treated effluent will require a bespoke permit and consent from the EA. There could be Environmental reasons why the EA may not favour a new WTW on the site, particular as the site lies close to a SSSI. As the site lies in close proximity to the public foul water sewer network relative to the size of the development, the EA's binding rules state that a connection should be made to the existing public foul sewer, however it is recommended that a pre-app consultation with the EA is undertaken to determine their requirements.

<sup>&</sup>lt;sup>9</sup>Environment Agency General Binding Rules for Sewage Discharge to Surface Water. Gov.uk Website. <u>https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water</u>



## 7.0 COSTINGS

- 7.1 A ballpark budget cost estimate has been prepared for the foul drainage infrastructure that will be required to serve the site. Two options have been considered.
  - Option 1 is a costing based on a pumping station and rising that is connected to the existing public foul sewer network located in Shoreham by Sea. A connection to Upper Beeding would be slightly shorter, however due to the size of catchment area and extent of the existing infrastructure we considered that a connection to the Shoreham catchment would be the more likely based on the available information. However, the point of connection will need to be confirmed by Southern Water. Should a connection to upper Beeding be feasible then the cost estimate can be adjusted accordingly.
  - Option 2 is a costing based on a Waste Water Treatment Works (WTW) located on the site, that would discharge treated effluent to the River Adur.

**Option 1: Pump Station and Rising Main and Connection to Shoreham Public Sewer.** 

- 7.2 This will require a pumping station compound to be located on the site. A typical size of the compound is approximately 10m x 15m. There would need to be a 20m off-set distance from the pumping station to the nearest building or dwelling. A possible location on the site for the pumping station is shown on the foul drainage strategy drawing included in **Appendix A**. The location of the foul pumping station has been selected on the basis of site levels and this is close to the low point of the site and the proximity to the connection point to the existing foul sewer network in Shoreham. Foul pumping stations are defined by the National Planning Policy Framework (NPPF) as water-compatible development that is appropriate to be located in FZ1, FZ2 & FZ3.
- 7.3 A budget cost estimate based on Option 1 pumping station and a rising main connection to Shoreham by Sea has been undertaken for the 4 development scenarios. The costings are based on Southern Water New Connections Services Charging Arrangements 2021-22 – January 2021 v2<sup>10</sup>.

<sup>&</sup>lt;sup>10</sup> Southern Water New Connections Services Charging Arrangements 2021-22 – January 2021 v2.



### Table 7.1: Option 1 - Budget cost estimate for 4 development scenarios.

SDNPA		JOB NAME:	Shoreham Cement Works	
BALL PARK COST ESTIMATE		PROJECT NUMBER:	sdshc2111035	
WASTEWATER INFRASTRUCTURE CHARGES		CALCS BY:	KL	
		DATE:	12/02/2022	
Foul Drainage Infrastructure Civils Works	an anna	FROM DRG:		
DESCRIPTION	QUANTITY	UNIT	RATE	£
Connecting pipework Main Road [>150-300mmp up to 2.5 - 3.5m depth]	8	м	1,316.00	£10,528.00
New gravity sewer [Unmade 150-300ø at 1.5m - 2.5m depth]	4294	м	512.00	£2,196,528.00
New Manhole (Unmade Ground 1200mm 1.5 - 2.5m depth)	76	Per Manhole	6,413.00	£487,388.00
New Rising Main [Main Road 180 - 255mmø at 1.5m depth]	2960	м	699,00	£2,069,040.00
Road closure charge	10	Per Closure	1570.00	£15,700.00
Traffic management	16	Weekly Charge	1,258.00	£20,128.00
Extra-over TM charges for works on A283	1	Item	150,000.00	£150,000.00
Over-pumping the receiving sewer	1	Per connection	2,829.00	£2,829.00
Specialist de-watering	1	Perconnection	13,170.00	£13,170-00
Specialist ground support	1	Per connection	2,780.00	£2,780.00
Estimated capital costs for pumping stations	1	Per Unit	277.000.00	£277,000.00
		10%	Minor Items	£524,709.10
			Total	15,771,800.10



DESCRIPTION	QUANTITY	UNIT	RATE	£
Section 100/107 app		ministration charges		
S106/107 Application / Administration fee – Connection to existing sewer / manhole	1	Per Application	230.83	£230-83
S100/107 Application / Administration fee - New manhole construction	1	Per Application	295.83	£295-83
Section 104 / 102 app	lication and ad	ministration charges		
S102 - Application Fee (including initial administration)	1	Per Application	321.67	£321.67
S104 - Application Fee (including initial administration)	1	Per Application	515.00	£515.00
S102 / S104 - Technical / Inspection Fee (including Final administration)	£5,771,800.10	2.5% of Construction Value	0.025	£144,295.00
S102/S104 Legal Fee	1	Per Application	400.00	£400.00
S104 - Security	£5,771,800.10	10% of construction value	0.10	£577,180.01
Section 98 red	quisition applic	ation charges	8 - 34	
\$98 Application fee (incuding initial administration)	0	Per Application	3,894.00	£0.00
\$98 - Design fee	0	10% of construction value	0.10	60.00
598 - Point of connection enquiny	D	Per Application	110	£0.00
			Total	£723,238.34
Wastewater Infrastructure Charges				
DESCRIPTION	QUANTITY	UNIT	RATE	£
New infrastructure Charge - Scenario 1	417	Per Property	574.00	£239,358.00
New Infrastructure Charge - Scenario 2	257	Per Property	574.00	£147,518.00
New Infrastructure Charge - Scenario 3	212	Per Property	574.00	£121,685.00
New Infrastructure Charge - Scenario 4	93	Per Property	574.00	£53,382.00

Income Offset Discount	1			
DESCRIPTION	QUANTITY	UNIT	RATE	£
Soenario 1	A mar h			
2 bedroom property	400	Per Property	-128.00	-£51,200.0
Income offset for commercial property (rate TBC)	17	Per Property	-128.00	-£2,176.0
a		N 8.	Total	-£51,200.0
Scenario 2	8		1	
2 bedroom property	240	Per Property	-128.00	-£30,720.00
Income offset for commercial property (rate TBC)	14	Per Property	-128.00	-£1,792.0
a 80c= 15520 89			Total	-830,720.0
Scenario 3	A		1	2000-00000
2 bedroom property	200	Per Property	-128.00	-£25,600.00
Income offset for commercial property (rate TBC)	7	Per Property	-128.00	-£896.00
a		0 0	Total	-625,600.00
Scenario 4	N		1	20120200
2 bedroom property	84	Per Property	-128.00	-£10,752.00
Income offset for commercial property (rate TBC)	8	Per Property	-128.00	-£1,024.00
e 2004. 1000. 54	11 V	99 - 60	Total	-810,752.00
			and the second se	A REAL PROPERTY AND A REAL

DESCRIPTION	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Foul Drainage Infrastructure Civils Works	65,771,800.10	£5,771,800.10	£5,771,800.10	45,771,800.10
Administration Charges	£723,238.34	E713,238.34	£723,238.34	£723,238.34
Wastewater Infrastructure Charges	£239,358.00	£147,518.00	£121,688,00	£\$3,382.00
Income Offset Discourt	-£51,200.00	-£30,720.00	-£25,600.00	-£10,752.00
30% Contingency	E2,004,958.93	EL,983,550.93	£1,977,337.93	£1,961,300.53
TOTAL	68,688,155.38	£8,595,387.38	£3,568,464.38	£8,498,968.98

	Clarifications and Exclusions						
1	All rate estimated from Southern Water charging arran	gements 2019	-20 document (Janua	ry 2019) unless	marked with *		
2	Rates marked with * estimated from Environment Age	ncy Cost Estim	ated for Control Ass	ets			
3	The cost estimate is based on fixed charges levied by S	outhern Wate	er and does not take i	nto account pro	jects where the t	echncial com	plexity is high.
4	For exceptions to fixed charges refer to the Southern \	Vatert New Co	onnections Services O	harging Arrange	ements 2019-20 (.	lanuary 2019)	
5	Standard traffic management charges have been allow	ed for, includi	ng an uplift for TM fo	or works on the	A283.		
6	The above cost estimate is based on laying a rising mai	n to the foul p	oublic sewer system i	n Shoreham.			
7	The point of connection to the public sewer system is	to be confirme	ed following consulat	ion with Southe	ern Water.		
8	The cost estimate makes no allowance for reinforceme	ent works to th	ne existing foul publi	c sewer networ	k.		
9	It has been assumed that any reinforcement work to the	ne public sewe	er system will be fina	nced by the infr	astructure charge	es levied by S	outhern Water.
10	There is no allowance for statutory undertaker diversion	on works that	may be required as a	result of the co	nstruction of the	new foul wat	er infrastructure.
11	The cost does not allow for additional highway improv	ement works	required by the high	way authority.			
12	Additional highway works would include any works ov	er and above r	normal highway reins	statement work	s following the co	onstruction of	pipes and manholes.
13	There is no allowance for any works to existing structu	res.					
14	There is no allowance on the costs for dealing with cor	tamination or	settlement associat	ed with the mad	le ground presen	t on the site.	
15	No allowance has been made for piling drainage runs a	is a result of p	ossible settlement is	sues.		1	
16	Method of calculating the incoming offset for commer	cial property is	s to be confirmed by	Southern Water	r.	1	
17	An allowance has been made for incoming offset for co	ommercial pro	perty based on the i	ncome offset fo	r residential.		
18	The method of calculating the wastewater infrastructu	re charges is r	ot know and therefo	re has been cal	culated based on	an assessmer	nt of the number
	of commercial premises and by applying the residentia	al charge, how	ever this will be subj	ect to confirma	tion of final costs	from Southe	rn Water.
19	The budge cost estimate includes a 30% contingency u	olift.					

### **Option 2: Waste Water Treatment Works (WWTW)**

- 7.4 This will require a compound to be located on the site for the WWTW. We have based the size of the compound on approximation that will need to be confirmed through consultation with the WWTW supplier. For the purpose of this report we have allowed for an areas of approximately 30m x 50m, or 1,500m2, that has been that has been recommended by the Plantworks Systems. There would need to be a 40m off-set distance from the pumping station to the nearest building or dwelling. A possible location on the site for the WWTW is shown on the foul drainage strategy drawing included in **Appendix A**. The location of the WWTW has been selected on the basis of site levels and the proximity of the river Adur as the WWTW will need to outfall to the river. WWTW are defined by the National Planning Policy Framework (NPPF) as being less vulnerable development that is appropriate in FZ1, FZ2.
- A budget cost estimate based on Option 2 WWTW has been undertaken for the 4 development scenarios.
   The costings are based on Southern Water New Connections Services Charging Arrangements 2021-22
   January 2021 v2<sup>11</sup>.

<sup>&</sup>lt;sup>11</sup> Southern Water New Connections Services Charging Arrangements 2021-22 –January 2021 v2.



### Table 7.2: Option 2 - Budget cost estimate for 4 development scenarios.

SDNPA		JOB NAME:	Shoreham Cement Works	
BALL PARK COST ESTIMATE		PROJECT NUMBER:	sdsho2111035	
WASTEWATER INFRASTRUCTURE CHARGES		CALCS BY:	KL.	
Option 2: Wastewater Treatment Works (WTW)		DATE:	16/12/2021	
Foul Drainage Infrastructure Civils Works		FROM DRG:		
DESCRIPTION	QUANTITY	UNIT	RATE	£
Connecting pipework Main Road [>150-300mmø up to 2.5 - 3.5m depth]	8	м	1,316.00	£10,528.00
New gravity sewer [Unmade 150-300p at 1.5m - 2.5m depth]	4294	м	512.00	£2,198,528.00
New Manhole [Unmade Ground 1200mm 1.5 - 2.5m depth]	76	Per Manhole	6,413.00	£487,388.00
New Rising Main [Main Road 180 - 255mmø at 1,5m depth]	o	M	699,00	60.03
Road closure charge	0	Per Closure	1570.00	£0.00
Traffic management	0	Weekly Charge	1,258.00	60.00
Extra-over TM charges for works on A283	0	Item	150,000.00	£0.00
Over-pumping the receiving sewer	0	Per connection	2,829.00	£0.00
Specialist de-watering	0	Per connection	13,170.00	60-00
Specialist ground support	0	Per connection	2,780.00	60.00
Estimated capital costs for WTW*	1	Per Unit	1,000,000.00	£1,000,000.00
1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1999 - 1997 -	1	10%	Minor Items	£369,644.40
	2		Total	£4,066,088.40



DESCRIPTION	QUANTITY	UNIT	RATE	£
Section 106/107 app		and the second	- AND	-
\$106/107 Application / Administration fee - Connection to existing sewer / manhole	0	Per Application	230.83	£0.00
5106/107 Application / Administration fee - New manhole construction	٥	Per Application	295.83	£0.00
Section 104 /102 app	lication and adr	ministration charges		
S102 - Application Fee (including initial administration)	ō	Per Application	321.67	£0.00
S104 - Application Fee (including initial administration)	1	Per Application	515.00	£515.00
5102 / 5104 - Technical / Inspection Fee (including Final administration)	E4,066,088.40	2.5% of Construction Value	0.025	£101,652.21
S102/S104 Legal Fee	1	Per Application	400.00	£400.00
\$104 - Security	£4,066,088.40	10% of construction value	0.10	£406,608.84
Section 98 re-	quisition applic	ation charges	1	
S98 Application fee (incuding initial administration)	0	Per Application	3,894.00	£0.00
598 - Design fee	٥	10% of construction value	0.10	£0.00
\$98 - Point of connection enquiry	0	Per Application	110	£0.00
		ŀ	fotal	£509,176.05
Wastewater Infrastructure Charges				
DESCRIPTION	QUANTITY	UNIT	RATE	£
New Infrastructure Charge - Scenario 1	417	Per Property	574.00	£239,358.00
New Infrastructure Charge - Scenario 2	257	Per Property	574,00	£147,518.00
New Infrastructure Charge - Scenario 3	212	Per Property	574.00	£121,688.00
New Infrastructure Charge - Scenario 4	93	Per Property	574,00	£53,382.00

Income Offset Discount				
DESCRIPTION	QUANTITY	UNIT	RATE	£
Scenario 1	2		- Constant	
2 bedroom property	400	Per Property	-128.00	-£51,200.00
Income offset for commercial property (rate TBC)	17	Per Property	-128.00	-£2,176.00
1			Total	-£51,200.00
Scenario 2	R		1	0.0000000000
2 bedroom property	240	Per Property	-128.00	-£30,720.00
Income offset for commercial property (rate TBC)	14	Per Property	-128.00	-£1,792.00
			Total	-630,720.00
Scenario 3	A course of			
2 bedroom property	200	Per Property	-128.00	-£25,600.00
Income offset for commercial property (rate TBC)	7	Per Property	-128.00	-£896.00
e		0. O	Total	-825,600.00
Scenario 4	A			20122000
2 bedroom property	84	Per Property	-128.00	-£10,752.00
Income offset for commercial property (rate TBC)	8	Per Property	-128.00	-£1,024.00
a (k. 1997) - 1997)	10 IV	01 - 12 - 12 - 12 - 12 - 12 - 12 - 12 -	Total	-810,752.00

DESCRIPTION	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Foul Drainage Infrastructure Civils Works	£4,066,088,40	£4,066,088.40	64,066,088.40	£4,066,088.40
Administration Charges	E509,176.05	£509,175.05	£509,176.05	£509,176.05
Wastewater infrastructure Charges	£239,358.00	£147,518.00	£121.683.00	653,382.00
Income Offset Discount	-£51,200,00	-£30,720.00	-E25.600.00	-£10,752.00
30% Contingency	£1,429,026.74	£1,407,618.74	£1,401,405.74	£1,385,368.34
TOTAL	£6,192,445,19	£6,095,681.19	£6,072,758.19	£6,503,262.79

#### Clarifications and Exclusions

- 1 All rate estimated from Southern Writer charging amongements 2021-22 document (January 2021 v2) unless marked with \*
- 2 Rates marked with \* Is a budget cost estimate for a WEW provided by Plantwork Systems which includes design costs.
- 5 The cost estimate is based on fixed charges levied by Southern Wrater and does not take into account projects where the technical complexity is high,
- 4 For exceptions to fixed charges refer to the Southern Water New Connections Services Charging Arrangements 2019-20.
- 5 The calculation of infrastructure charges assumes that the system still be adopted by Southern Water.
- 6 There is no elicenance for statutory undertaken diversion works that may be required as a result of the construction of the new foul water infrastructure.
- There is no allowance for any works to consting structures.
   There is no allowance on the costs for dealing with contamination or settlement associated with the made ground present on the site.
- 5 No allowance has been made for piling chainage rum as a mult of possible settlement haves.
- 10 Method of subulating the incoming offset for commercial property is to be confirmed by Southern Water.
- An allowance has been made for incoming offset for commercial property based on the income offset for residential.
- 12 The method of calculating the workewater infrastructure charges is not know and therefore has been calculated based on an assessment of the number
- of commercial premises and by applying the residential charge, however this will be subject to confirmation of final costs from Southern Water.
  10 The budget cost estimate includes a 30% contingency uplift.

### Pros and Cons of Option 1 and Option 2.

#### 7.6 The pros and cons of Option 1 and Option 2 are considered in Table 7.3.

#### Table 7.3: Pros and Cons of Option 1 and Option 2

Option 1: Pump Station and Rising Main and Connection to Shoreham Public Sewer.			
Pros	Cons		
The distance from the existing foul public sewer network meets the Environment Agency criteria of a reasonable distance for a connection to the public sewer.	Cost of the works to construct a 3km rising main connection to the existing public sewer network located in Shoreham.		
Any reinforcement of the existing foul sewer network should be financed by Southern Water's infrastructure charges.	Drainage works along the A283 single carriageway road and across the A27 roundabout junction. Traffic management on public highway and disruption for members of the public, including one way work on A283 single carriageway road and traffic signals control.		
Standardised and detailed costings are available based on Southern Water New Connections Services Charging Arrangements.	Environmental and sustainability impacts of having to provide more infrastructure, including constructing the 3km link to Shoreham foul public sewer network.		
Southern Water can use their Statutory Powers to undertake any works within private land or highway land to deliver the works.			
Does not require a new sewage discharge to the River Adur near a SSSI and avoids environmental impacts of having a new discharge to surface water.			



Option 2: Waste Water Treatment Works (	WTW)
Pros	Cons
The Cost of WWTW is less than Option 1.	Requires a new sewage discharge to the River Adur near a SSSI and could result in environmental impacts. Bespoke permitting would be required and may meet opposition from the regulators.
Environmental and sustainability benefits of having to provide less infrastructure, including avoiding having to construct the 3km link to Shoreham foul public sewer network.	This site is located within a reasonable distance of an existing foul sewer network in accordance with the EA's standard criteria and therefore a new connection to the River Adur may meet resistance from the EA / regulators.
Less disruption to the highway network and for member of the public by avoiding having to construct the 3km link to Shoreham foul public sewer network.	The land required for a WWTW (1,500m2) would be larger than for a pump station, which would be a constraint on development.
	Typical stand-off distance from WTW to nearest dwelling is 40m, which would be a constraint on development.

### New Appointments and Variations (NAV)

- 7.8 New appointment and variations (NAV) are limited companies which provide a water and/or sewerage service to customers in an area which was previously provided by the incumbent monopoly provider<sup>12</sup>. A new appointment is made when a limited company is appointed by Ofwat to provide water and/or sewerage services for a specific geographical area. A new appointee has the same duties and responsibilities as the previous statutory water company.
- 7.9 NAVs are a form of competition that allows some customers, under certain criteria, to choose a different supplier of services. As a result, they can deliver a number of potential benefits to customers, including:
  - Lower prices
  - Improve service
  - A better range of product and services
  - Environmental benefits; and
  - Customer choice.
- 7.10 A full-service NAV is a NAV that provides a complete end-to-end service on a site. For wastewater this incorporates collection, treatment and sludge treatment and disposal.
- 7.11 In order to be eligible for NAV to meet water supply and sewerage requirements, the development site needs to comply with one of the following criteria.

<sup>&</sup>lt;sup>12</sup> Ofwat New Appointments and Variations Website. <u>https://www.ofwat.gov.uk/regulated-companies/markets/nav-market/nav-publications/</u>



- Unserved criterion: The area does not contain any premises that receive services from an appointed water or sewage company.
- Consent criterion: The existing appointed company agrees to transfer the site or premises to another company.
- The large user criterion: the site uses at least 50 megalitres of water a year.
- 7.12 The development site is not currently served by Southern Water for water supply and sewerage. Also, for 3 of the 4 development scenarios water usage is estimated to exceed 50 megalitres, therefore the site meets the criteria to be eligible for NAV under the Ofwat guidance.



### 8.0 SUMMARY AND CONCLUSIONS

- 8.1 This Foul Water Drainage Strategy has been prepared on behalf of the South Downs National Park Authority (SDNPA) in support of providing a programme of works for drainage investigations to support the four development scenarios being considered for the Shoreham Cement Works site in West Sussex.
- 8.2 Shoreham Cement Works is not connected to the Southern Water clean water mains or wastewater sewerage network. There is an existing private system of foul and surface water drains, including outfalls to the River Adur and two existing discharges of treated effluent to the ground and surface water.
- 8.3 Four development scenarios (Scenario 1, 2, 3 and 4) are currently being considered with varying development mixes of residential, employment, education, retail, sports and recreation and consumption food and drink. Scenario 1 has the highest quantity of development and results in the highest flows, the quantity of the development and flows reduces to Scenario 4 which has the lowest.
- 8.4 The foul water drainage strategy for the site for all 4 development scenarios is that wastewater would drain by gravity from the high point in Area D, through areas C and B to the low point of the site in Area A by the River Adur. Then depending on which option is selected and is viable for the site, the site will either be connected to the existing sewer network by a new pumping station located on the site and a rising main, or a new Wastewater Treatment Works (WTW) would be constructed on the site that would discharge the treated effluent to the River Adur.
- 8.5 A new WTW and discharge would require a consent and bespoke permit from the Environment Agency (EA). The site lies in close proximity to the public foul water sewer network relative to the size of the development, the EA's binding rules state that a connection should be made to the existing public foul sewer. The Shoreham Cement Works site also lies within 500m of the Beeding Hill to Newtimber SSSI There could also be Environmental reasons why regulators may not favour a new WTW on the site. However, it is recommended that a consultation is undertaken with the EA to determine their requirements.
- 8.6 The nearest adopted foul sewer networks to the site are located in Upper Beeding to the north in the Steyning Catchment area and at the western extent of the Shoreham on Sea built up area by Steyning Road in the Shoreham Catchment area. The Upper Beeding foul sewer network is located approximately 1.9 km from The Site and the Shoreham foul sewer network is located approximately 2.96 km from the site.
- 8.7 Ballpark budget cost estimates have been prepared for the foul drainage infrastructure that would be required to serve the site, based on the two foul water drainage strategies for the four development scenarios being considered.

Cost Summary for the 4 Development Scenari DESCRIPTION	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Foul Drainage infrastructure Civils Works	65,771,800.10	£5,771,800.10	£5,771,800.10	15,771,800.10
Administration Charges	£723,238.34	E713,238.34	£723,238.34	£723,238.34
Wastewater Infrastructure Charges	£239,358.00	£147,518.00	£121,688,00	£53,382.00
Income Offset Discourt	-£51,200.00	-£30,720.00	-£25,600.00	-£10,752.00
30% Contingency	E2,004,958.93	EL,983,550.93	£1,977,337.93	£1,961,300.53
TOTAL	68,688,155.38	£8,595,387.38	£3,568,464.38	£8,498,968.98

#### Table 8.1: Option 1 - Cost summary for the 4 development scenarios



#### Table 8.2: Option 2 - Cost summary for the 4 development scenarios

DESCRIPTION	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Foul Drainage Intrastructure Civils Works	£4,066,088,40	£4,066,088.40	64,066,088.40	£4,066,088.40
Administration Charges	ES09,176.05	£509,175.05	£509,176.05	£509,176.05
Wastewater Infrastructure Charges	£239,358.00	£147,518.00	£121,688.00	653,382.00
Income Offset Discount	-£51,200,00	-£30,720.00	-E25,600.00	-£10,752.00
30% Contingency	£1,429,026.74	£1,407,618.74	£1,401,405.74	£1,385,368.34
TOTAL	f6,192,445,19	£6,095,681.19	£6,072,758.19	£6,503,262.79

8.8 The cost estimates are based on a network of foul sewers constructed on the site as shown on the foul water drainage strategy drawing in **Appendix A**. The foul sewer network covers the whole site for the 4 development scenarios and as such does not take into account possible reductions in total length of foul sewers and number of manholes as the size of the development areas reduces from Scenario 1 to Scenario 4. The lack of site layout therefore impacts on the accuracy of the costings at this stage and may have resulted in an inflating cost for the on-site foul sewer infrastructure, in particularly for Development Scenarios 2, 3 and 4.

#### **Recommendations for further work.**

- 8.9 Consult with Southern Water to determine a suitable point of connection to the foul public sewer network and to confirm adoption process and costings.
- 8.10 Undertake consultation with the EA to determine their requirements in relation to the development and to determine their requirement in relation to a WWTW to be located on the site with a discharge to the river Adur.
- 8.11 Determine if there is an option to obtain a full-service New appointment and variations (NAV) that will provide a complete end-to-end service incorporates collection, treatment and sludge treatment and disposal.
- 8.12 Update costs when site layouts are available for the 4 development scenarios.

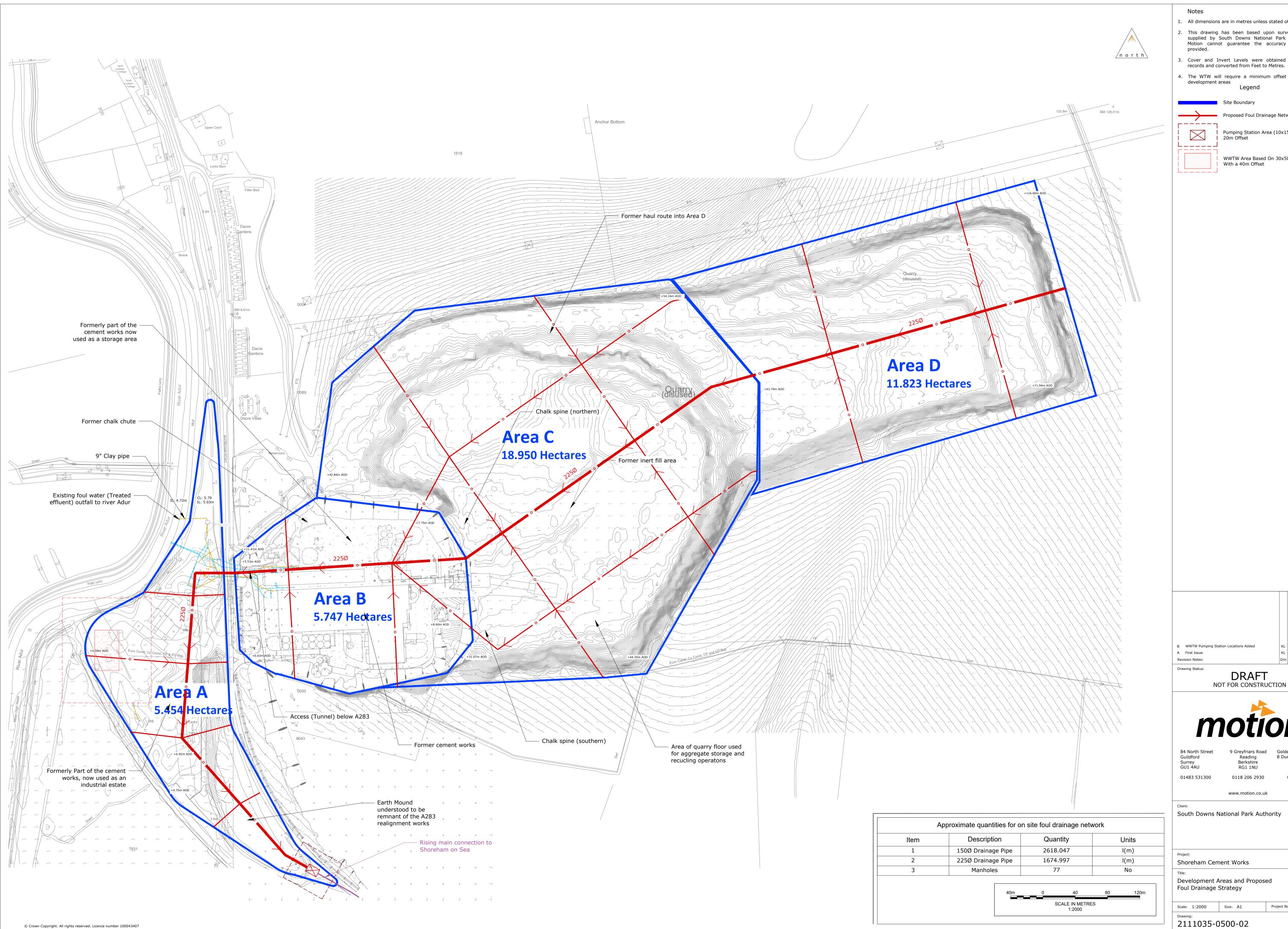


# Appendicies



# Appendix A

Development Area and Proposed Foul Drainage Strategy



All dimensions are in metres unless stated otherwise.

- This drawing has been based upon survey information supplied by South Downs National Park Authority and Motion cannot guarantee the accuracy of the data
- Cover and Invert Levels were obtained from historial records and converted from Feet to Metres.
- 4. The WTW will require a minimum offset distance from development areas Legend

Site Boundary

Proposed Foul Drainage Network

Pumping Station Area (10x15m) With a 20m Offset

WWTW Area Based On 30x50m Footprint With a 40m Offset

motion 9 Greyfriars Road Golden Cross House 8 Duncannon Street

DRAFT

KL JM JM 11/03/2022 KL JM JM 14-12-2021 Drn Chk App Date

London WC2N 4JF

020 7031 8141

Reading Berkshire RG1 1NU 0118 206 2930

www.motion.co.uk

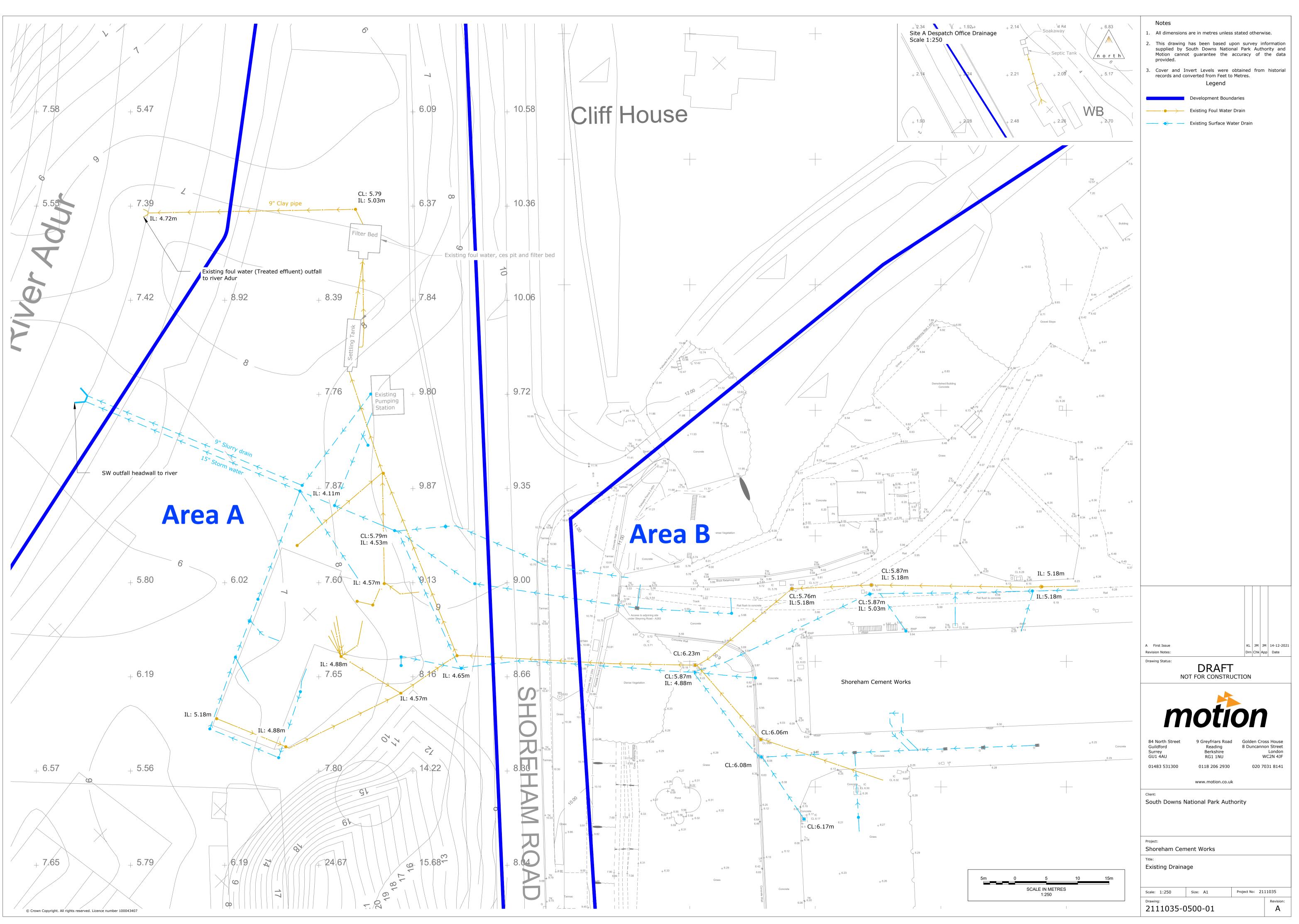
South Downs National Park Authority

Project:						
Shoreham Cement Works						
Title:						
Development Areas and Proposed Foul Drainage Strategy						
Scale: 1:2000	Size: A1	Project No: 21	11035			
Drawing:			Revision:			
2111035-0	B					



# **Appendix B**

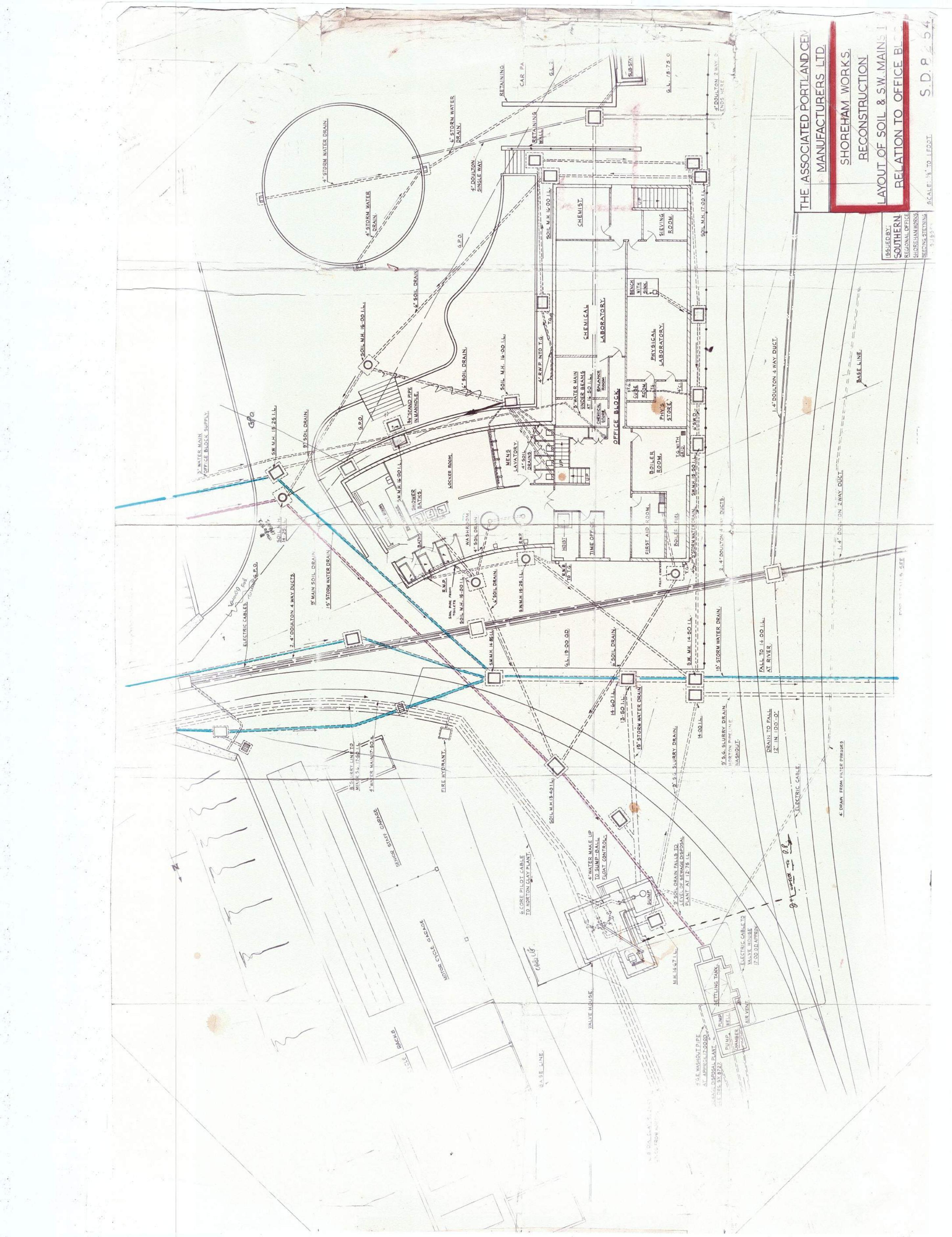
Existing Drainage.



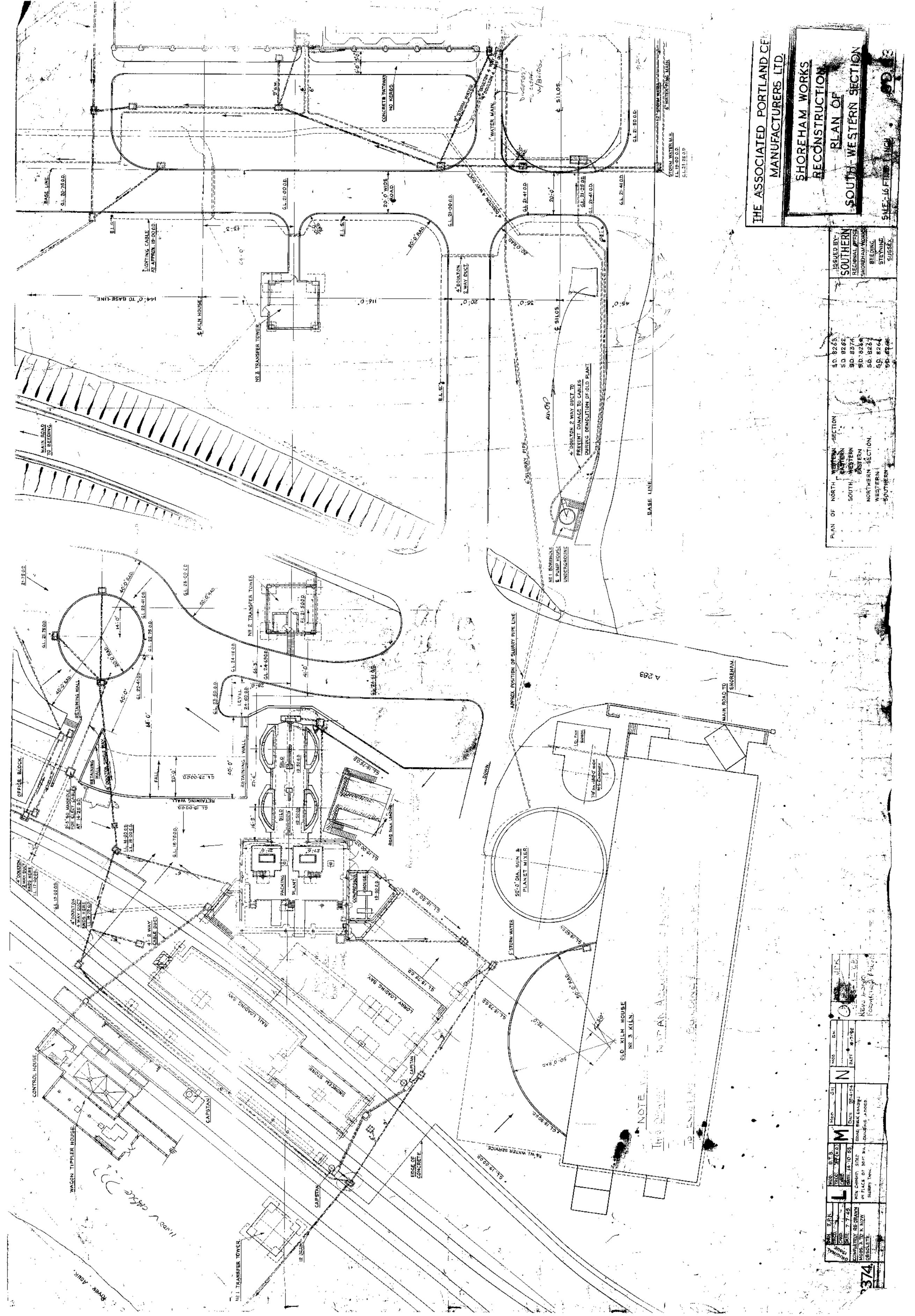


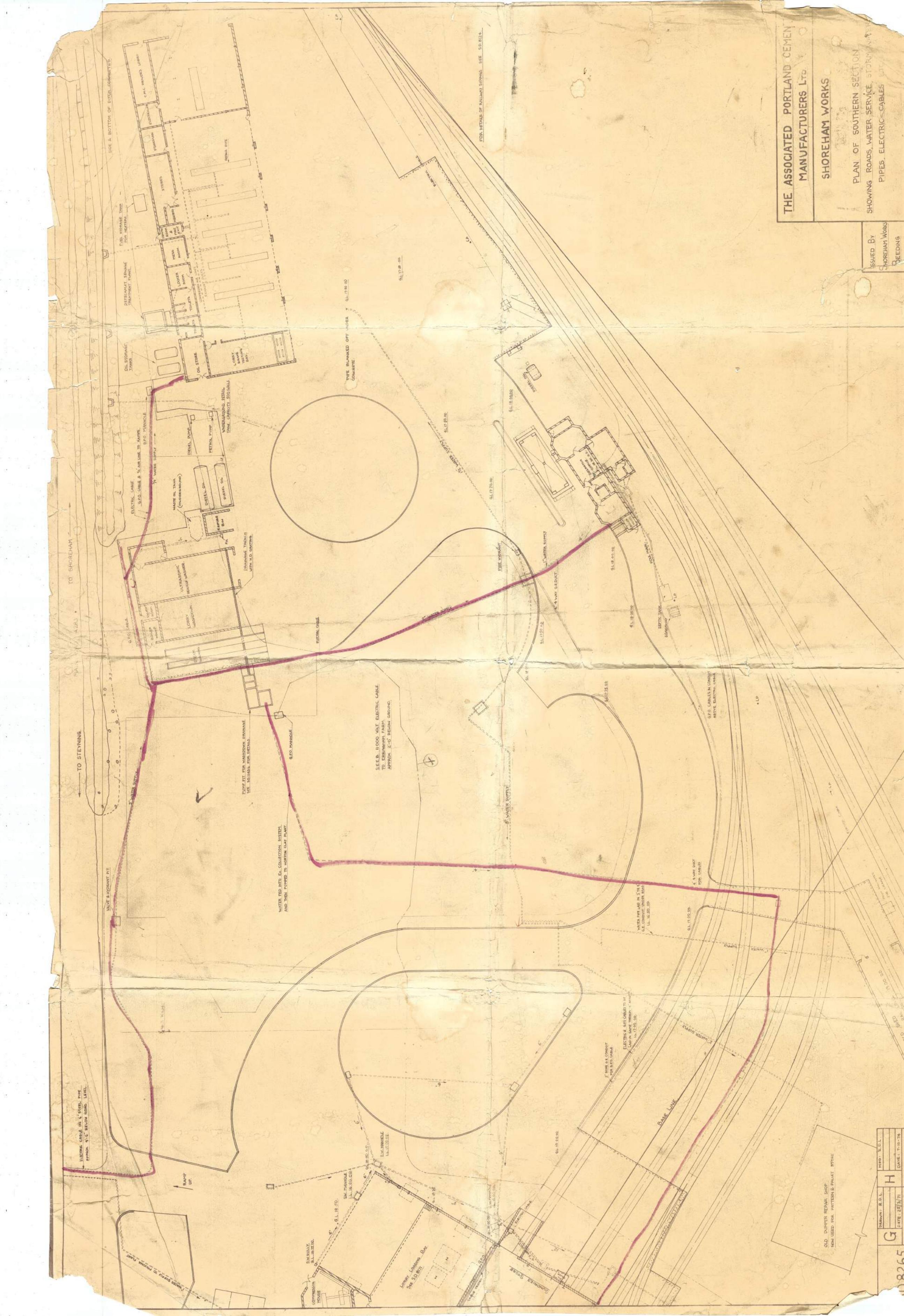
# Appendix C

Historic as-built records of Shoreham Cement Work existing drainage.





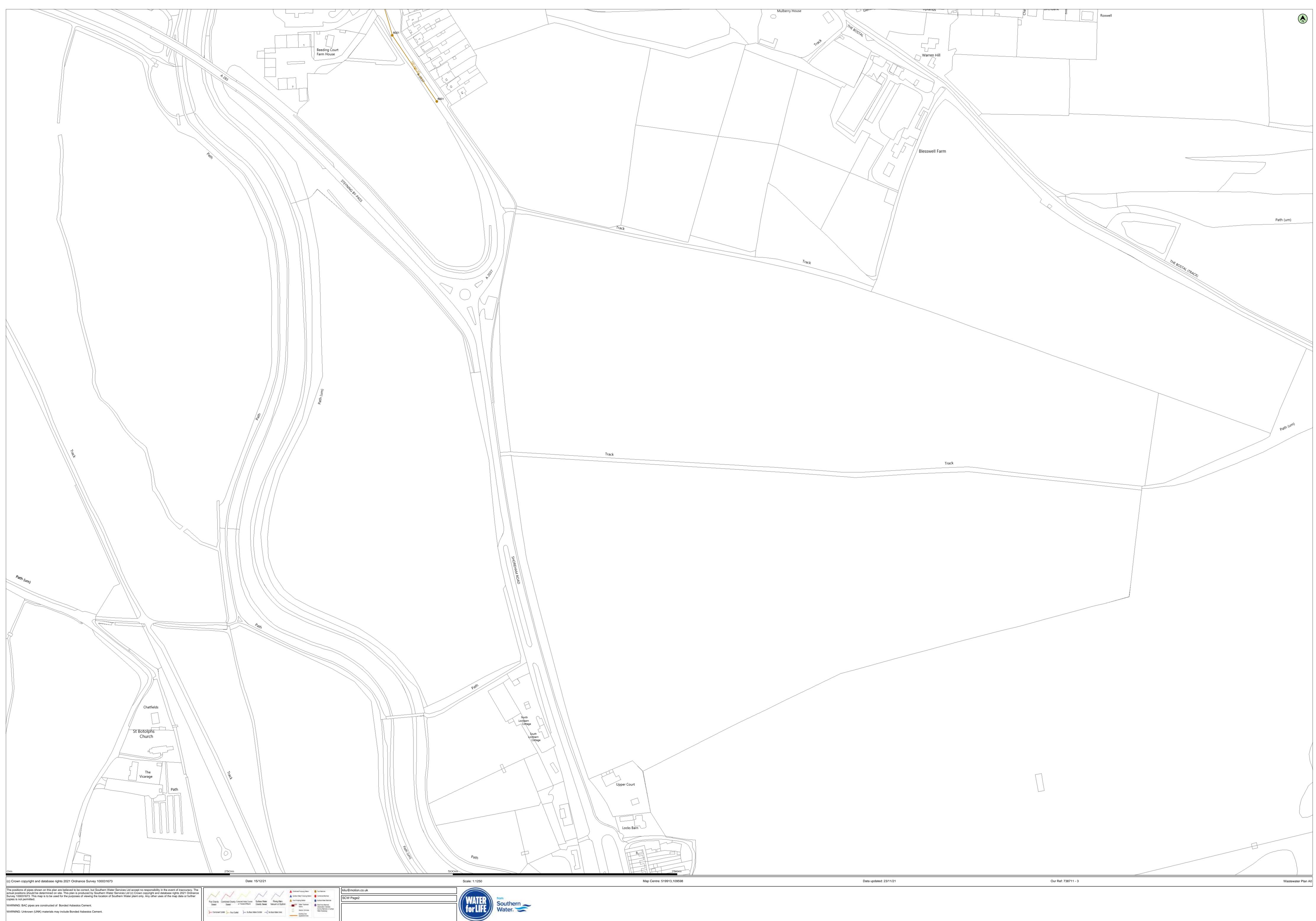


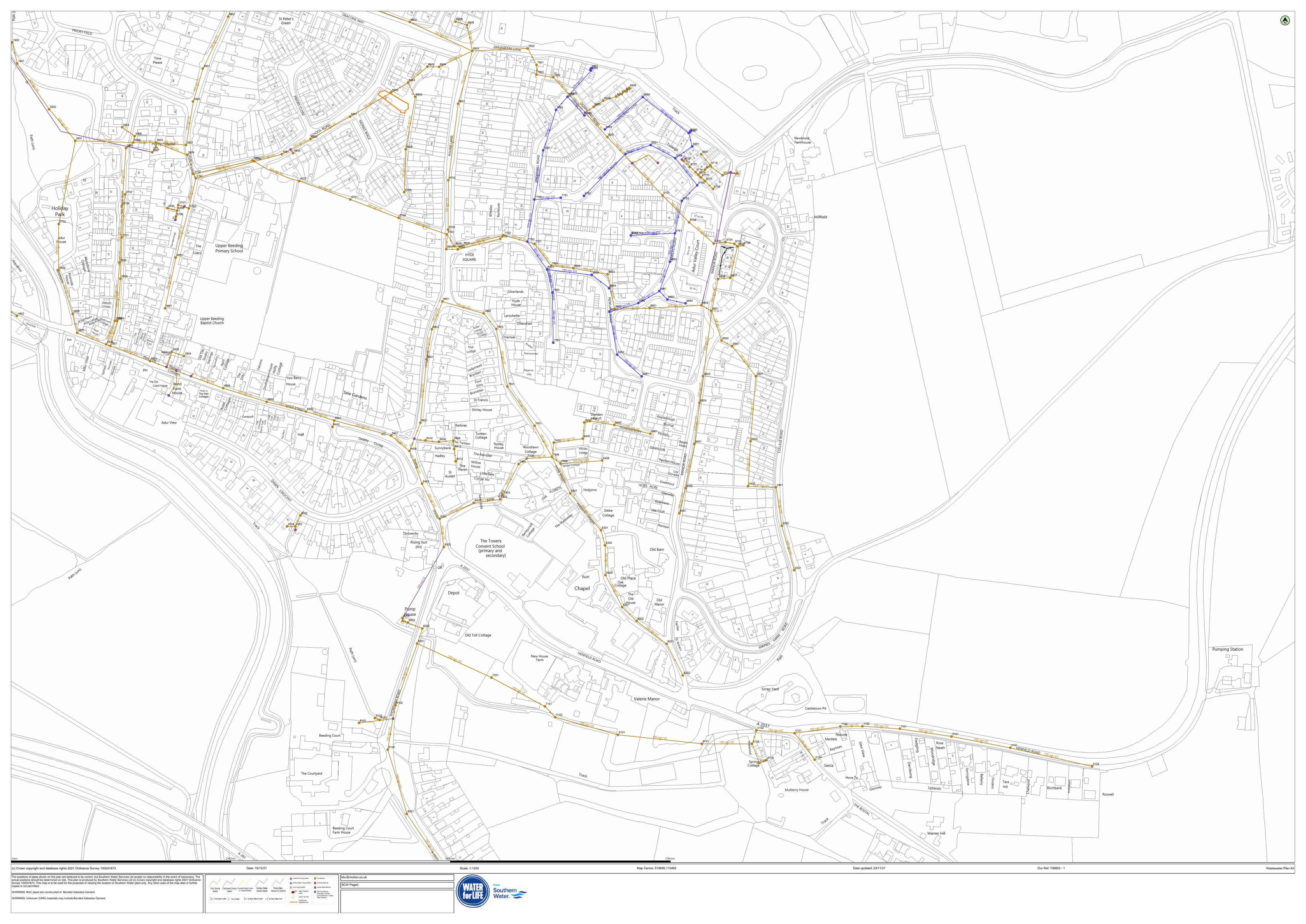


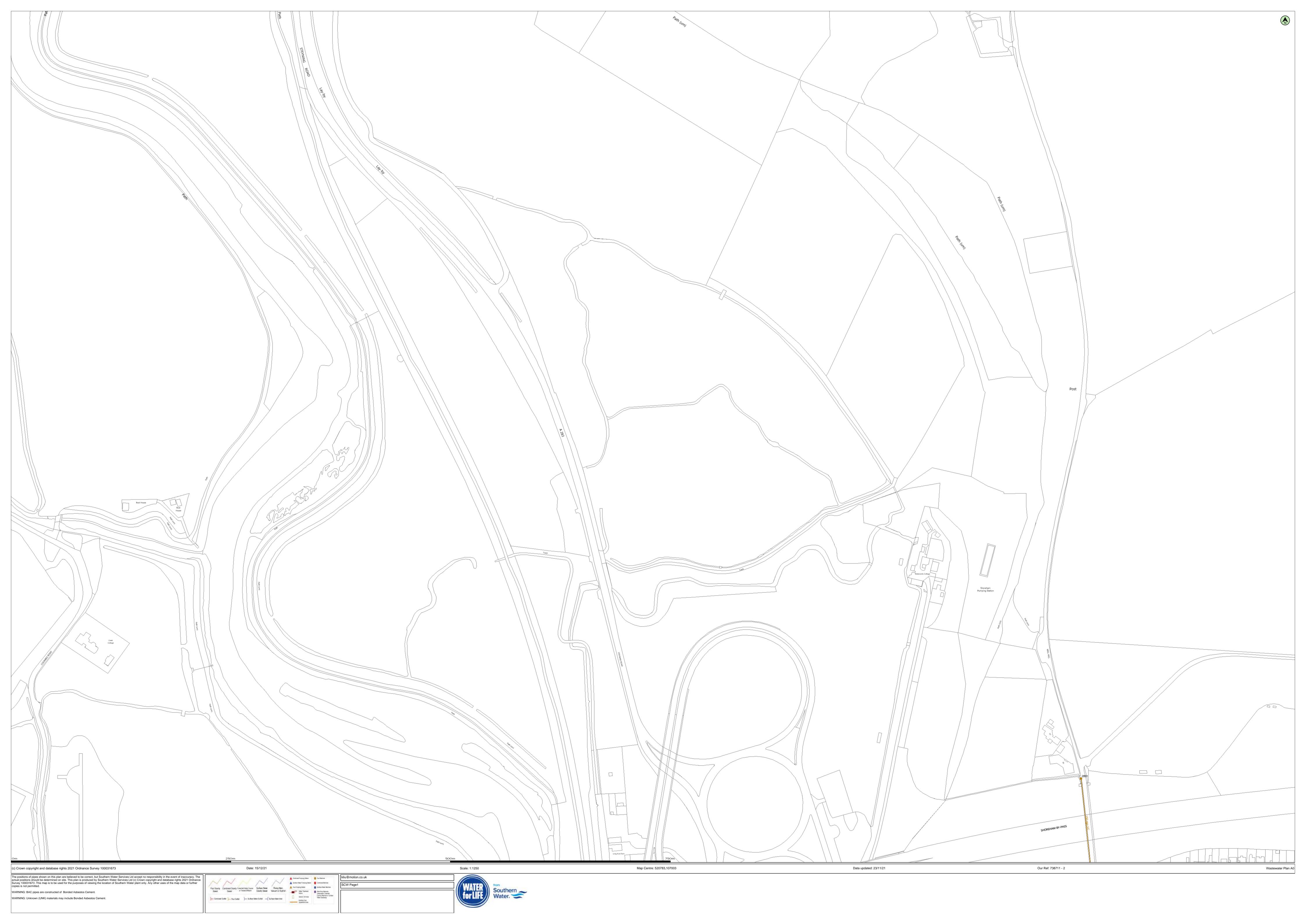


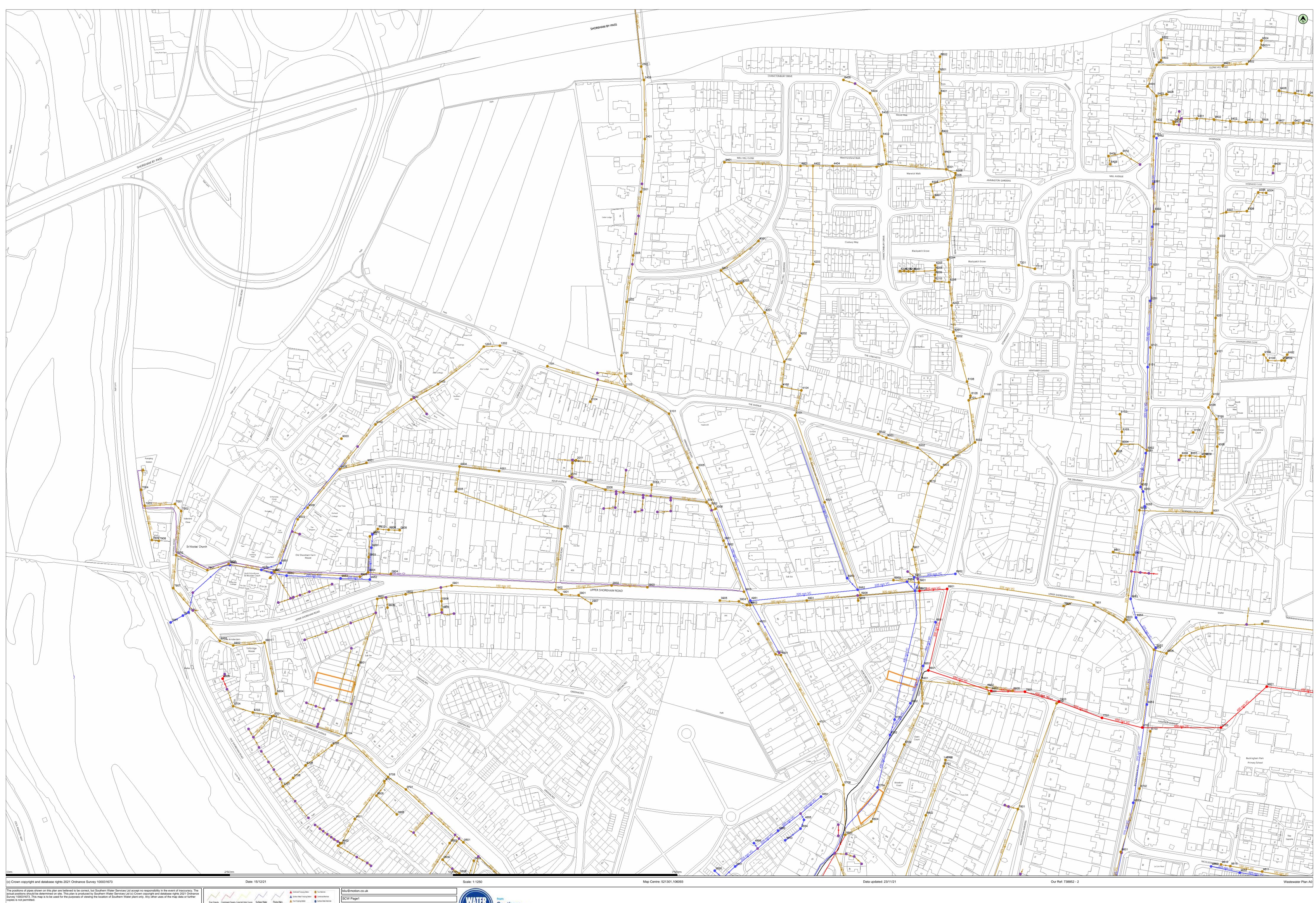
# Appendix D

Southern Water wastewater and clean water records









WARNING: BAC pipes are constructed of Bonded Asbestos Cement. WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement. 
 Fait Dravity
 Conducted Scalety Counted Inter County
 Earlingte Water
 Rising Main.

 Sevent
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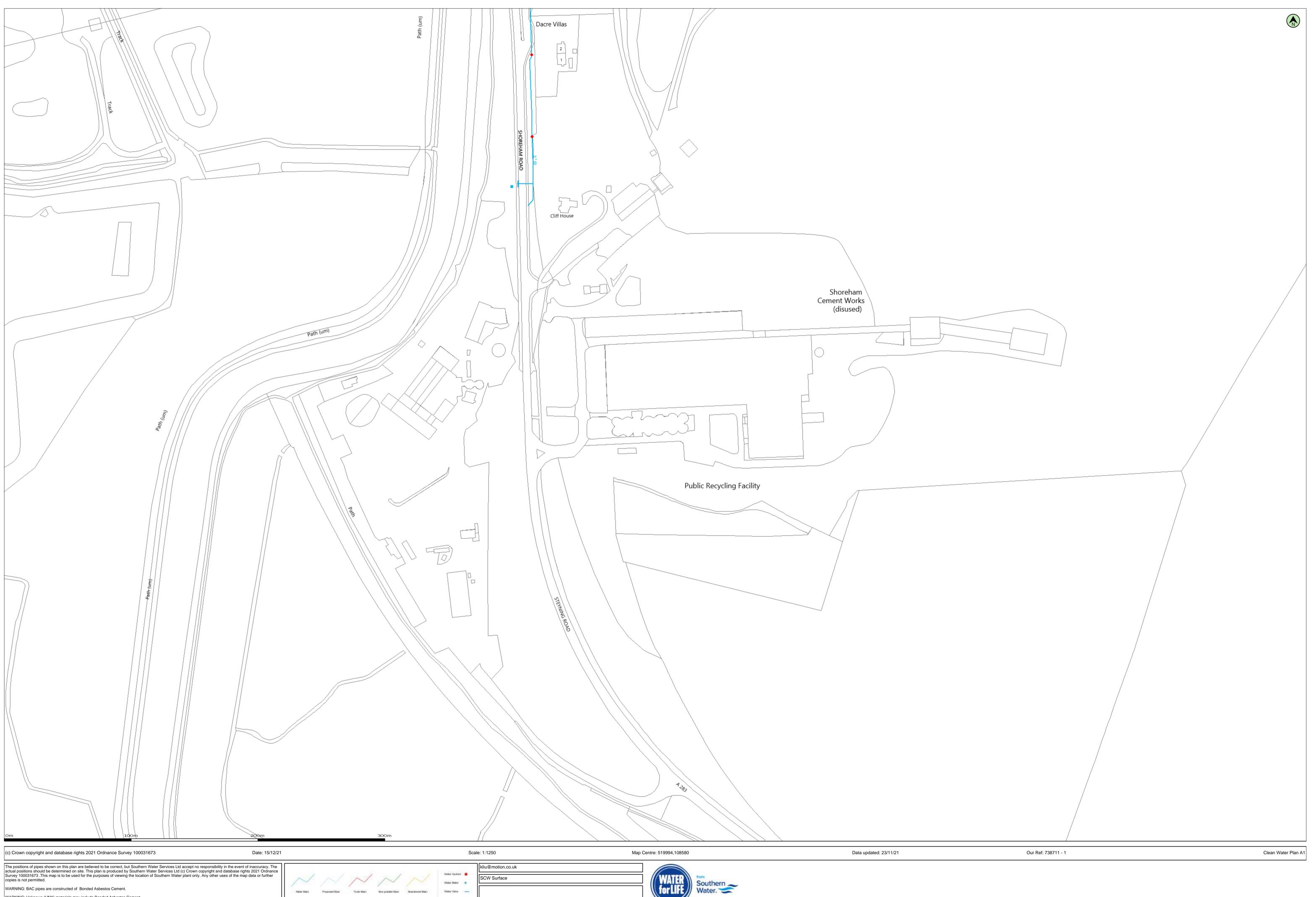
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WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement.