

## **Post Mill Lane Fressingfield Appeal APP/W3520/W/19/3227159**

I am writing to OBJECT to the building of houses in Post Mill lane and request that the Appeal be rejected. This objection is based on sewage egress and flooding in the village. The sewerage was planned in the late 1930s and building was delayed because of the war. Details of the sewerage problems can be found in the lobbying section of the SAFE web site [fressingfieldhousing.org](http://fressingfieldhousing.org) where there are many detailed papers.

The Fressingfield sewerage system was installed in 1946. The design of the system is well documented. Sewage from the current Post Mill development is pumped uphill to New Street and continues to Church Hill, down to Low Road (150mm pipe) where it joins , at the War Memorial, another similar size branch coming across the fields from the John Shepherd development. The two pipes then join and form a single 225mm pipe which runs 200 yards to the pumping station and continues along the Weybread Straight to the treatment plant in One Eyed Lane.

### **Problems -Sewerage**

There have been problems in the existing Post Mill houses with sewage refluxing into toilets and wash basins. This has been attributed to problems with the local pumping station in that housing development.



In Low Road, at times of heavy rainfall the sewerage manhole covers lift and raw sewage goes over the road and into gardens and also runs back into the stream (the Beck) to be dissipated further.

This is a long standing problem. There was correspondence in 1985 between our then MP, Michael Lord and the then Anglian Water CEO Peter Bray. The Chief Environmental Health Officer was involved,

but it was concluded that the correctional works needed were too expensive. It has variously been suggested that pump malfunction and failure to desludge the system was the cause. However, sewage egress has occurred following work to correct these problems, indicating they are not the cause.

The problem is becoming more common and more severe. Sewage egress occurred four times in a 5 month period between 28th December 2017 and April 2018. This is not exclusively a winter problem, but also occurs in summer (12 July 2016). The contamination has been so severe that Anglian Water have sent a " Clean Up Team " on one occasion.

Abdul Razaq, Director of Public Health and Protection, Suffolk County Council, has been involved and wrote on 11th May 2018.

*" Thank you for your emails. I would agree that the situation relating to sewage leaks is not acceptable and unpleasant. The legal powers sit with the environmental health departments and so I have ensured that Mid Suffolk District Council know of your concerns, but it from your email it seems both they and the water company are fully aware of the situation. I have informed Public Health England of the situation although they are advisory only and have no legal powers.*

*If sewage leakage does occur I am sure that you realise that it is important to avoid exposure and if exposure does occur scrupulous personal hygiene is essential"*

Because the sewage egress flows into the Beck it is further disseminated and has other impacts. Effect on wildlife may also have occurred ( Dr. James Meyer- Suffolk Wildlife) . It is noted that water voles have not been seen in the Beck after the latest sewage ingress. We have reported this to the Environment Agency as pollution of a water course.



### **The Cause**

In October 2018 SAFE held a joint meeting with four representatives from Anglian Water as well as representatives from Mid- Suffolk District Council.

At the meeting it was agreed that in times of high volumes the pressure in the pipe coming down hill from the John Shepherd development would be greater than the connection from Low Road because of gravity. This could result in back pressure on the sewer in Low Road causing the manholes to "pop".

Detailed investigations have been undertaken by Anglian Water and there is **no** ingress of general rain water into the closed system. It is believed that the sewer is overloaded at times of heavy rainfall due to dwellings discharging their surface water directly into the foul sewer. When this happens the manholes lift. (5 times last year). Historical connections of surface water directly to the foul sewer are not illegal and no resident can be forced to remove the connection. No one has any idea how many houses are connected. The problem cannot be solved by increasing the diameter of the pipe work because it would reduce flows in "normal " conditions to such a level as to increase smells and blockages. Should the manholes be sealed to prevent egress then there would be backflow of sewage into peoples' toilets and wash basins. Anglian Water confirmed that they are not

funded to invest in laying " storm pipes " for storm only events. Anglian Water confirmed that under normal conditions only 50% of the capacity of the sewerage system is currently used. There was agreement that the egress of sewage relates exclusively to periods of heavy rainfall and that the Beck need not flood for this to occur. The problem is that when it does flood effluent enters the water course. The point was made that there is no deliverable solution and the egress of sewage may continue. The fact was highlighted that with the potential for more houses to be connected to the sewer then more of the spare capacity would be utilised within the sewer making the " tipping point " for egress of sewage lower. i.e. there would be less capacity for surface water than at present.

Already 51 houses have been approved, but not yet built as well as two large public buildings. The impact of these developments on the sewage egress cannot be assessed, but based on the logic above it must make it worse.

The sewage generated from the Post Mill development currently proposed is not likely to impact significantly the capacity of the foul system in its own right. However it is reasonable to assume that in periods of high rainfall it will take less surface water to fill the capacity of the foul water system ( because it now contains more foul sewage) and that as a result an equivalent amount of rainfall post- development as pre-development will increase the risk and quantity of flooding. The flooding is also likely to contain increased levels of foul sewage content because there will be more in the system due to the increase in population.

#### **Comments by the Appellant**

*9.7.11 It is important to note that the appellant agrees that the overtopping of the sewer network is- whatever the cause- unacceptable. However, preventing new development is not going to solve the existing problem, and the fact that this issue was not raised on other, similar applications in the village which were approved in the 22 month period during which the appeal application was being determined, raises questions as to why it is such a significant issue in this application, but was not considered a problem for these other developments.*

*9.7.12 The test in para 11 NPPF requires adverse impacts to significantly and demonstrably outweigh the benefits of the proposal in order to justify refusal. Given the modest increase in flows generated from the proposed development ( which would represent a 6% increase in the number of properties served.). It is not considered that adverse impacts arising from this development in respect of foul water and surface flood water- if there are any at all- out weigh the benefits associated with the proposal.*

We agree with the Appellant that overtopping of the sewer network is unacceptable. Preventing new development will not solve the existing problem **BUT** it will stop the problem becoming **more frequent** and **more of a pollutant.** It was only after repeated meetings with Anglian Water and their investigations that the full cause of the problems were elucidated. It is now realised every new dwelling that is connected to the existing sewer network will make the situation worse. With more extreme weather conditions and climate change the problems are becoming more frequent and more obvious.

It is incorrect to state that issues have not been raised on other similar applications in the village. The application for a new chapel and 18 houses was approved in July 2018. (3872/16) The Planning Approval Condition concerning the surface Water drainage strategy has yet to be discharged. The senior Flood and Water Management Engineer for Suffolk County Council wrote in April 2018 about this scheme" "There is a significant risk to worsening flood risk in Fressingfield." (this information was obtained through an FOI request.)

In summary there have been long standing problems with the sewerage system which is not fit for purpose and these problems will be significantly exacerbated by a further 24 houses at Post Mill.

### **Flooding**

Fressingfield sits in a natural basin and the soil is impervious so the surface water naturally run to the low point, which is the Beck, using ditches and the roadways as conduit ( Church Hill and Back Road). Flow down these roadways can be very heavy and washes down mud and debris making them dangerous. Some surface water is discharged into the foul sewer. More houses and hard landscaping means more surface water and however it is restricted or temporarily restrained it must eventually flow down hill causing flooding and overload of the Beck and sewerage system.

There are two areas of " small surface water sewers (conduits)" which ultimately discharge into the Beck. They have no connection to the foul sewer.



Flooding is notoriously under-reported as Suffolk County Council themselves acknowledge, so our own evidence as residents is particularly important.

Flooding is a long standing problem in Low Road . We have representative photographs over the last 20 years. This is not only a problem in Winter, but occurs in Summer as well. It occurred 4 times in six months in 2018. Residents in Low Road have difficulty in obtaining house insurance as the area is a

designated flood zone. The cumulative effect of the 51 houses approved, but not yet built and the two communal buildings is unknown.

The surface water from the proposed Post Mill development drains exclusively into drainage ditches there are no sustainable drainage systems. The development will create an additional acre of hard standing. The Plandescil Report " Flood Risk Assessment , Surface Water Strategy and Foul Water Drainage Strategy" submitted with the Planning Application states " In the event of an exceedance event, consideration has to be given to route surface water away from vulnerable areas towards

drainage features" i.e. the houses should not flood, but more water will be diverted to the ditches and the lower village. This does not conform to the requirement of the NPPF not to cause off site flooding. The Applicant does not own all of the ditches, so he is unable to guarantee good maintenance. In any event more water going into the Beck (the " stream" mentioned in Appellant's submission) increases the risk of flooding. This flooding has occurred as far as Afton House up the Harleston Hill.

*" our overriding objective is to ensure there is no detriment to existing customers as a result of the development"* (Hannah Wilson – Anglian Water 20th April 2017)

*" Flood risk should be managed and not increase elsewhere by the development."* (NPPF July 2018)

### **Summary**

Egress of sewage onto the public roads and into private gardens and flooding are serious and unsavoury. The Appellant, although aware of the seriousness of the situation, has made no mitigation suggestions to ameliorate these serious problems which will be compounded by the building of a further 24 houses at Post Mill.