

Fareham Borough Council
Civic Offices Civic Way
Fareham
Hampshire
PO14 9SA


Date: 08 December 2017

Dear Sir/Madam

Fareham Borough Council Draft Local Plan

Thank you for consulting the Environment Agency and giving us the opportunity to provide comments on your draft local plan. Having read and reviewed the document we have the following comments to make;

General Comments

Throughout the document in all sections where the environment is mentioned, there is a great focus on the coast with regard to coastal erosion and tidal flood risk. Whilst paragraph 1.38 in the introduction mentions that there are 3 main rivers in the Borough, there is little recognition of these throughout the document, not only with regard to flood risk but also the water environment more generally. We think the importance of these should be better recognised not only in relation to the environment but also potential public amenity and health and wellbeing benefits.

In terms of waste water disposal it is important that Fareham Borough Council contact Southern Water to ensure that there is capacity both within the sewerage system and at the relevant treatment works to accommodate the quantum of development proposed. Peel Common Waste Water treatment works serves the majority of Fareham Borough. This discharges into the Solent which is currently failing under the Water Framework Directive (WFD) for dissolved inorganic nitrate. All development proposed needs to be accommodated within the existing consent for the works. The PUSH Integrated Water Management Study (IWMS) will also provide further information and evidence in relation to this.

In terms of water supply, Fareham Borough Council should also consult with Southern Water to ensure they are confident they can supply water for the quantum of development proposed. The Water Resource Management Plan runs from 2015-2040 and outlines how Southern Water intends to secure its water supply over the 25 year period. This was done in consultation with the Environment Agency. We would suggest that given the challenge that water resources present in this area that water efficiency measures are promoted and incorporated in development wherever possible.

We are disappointed with the lack of consideration of water quality throughout the document. We would suggest that an additional policy is included to provide a complete overarching direction in

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relation to the water environment. This would draw together all aspects that need to be considered in a holistic way. We suggest that the policy should include water resource (including water efficiency), water quality (including waste water disposal) and any local issues relating to flood risk. It is an opportunity to draw attention to the importance of protecting and enhancing water quality and demonstrating the key links between them.

Specific Comments

p.9 – This page includes an introduction to the environment. The presence of 3 main rivers is mentioned in 1.38 but the Plan doesn't seem to highlight that they also pose a potential flood risk. It would be useful if the text acknowledged both.

p.44 Policy H10 Gypsy and Travelling show people sites – we support bullet (f) especially the reference to sewage disposal. Ensuring this is done properly is essential to prevent pollution of the water environment.

p.71 CF5 and para 8.28 – we support these and are pleased to see them include a focus on networks and links including maximising opportunities for connection to the wider GI network and providing multifunction green space.

p.77 – Environment Chapter

We would recommend consideration is given to including a flood risk policy in this chapter. There are areas of the Borough at risk of flooding from both main rivers and the sea (in addition to local sources of flooding such as surface water), particularly in Portchester and from the River Wallington. The Environment Agency and Eastern Solent Coastal Partnership (ESCP) are developing plans to reduce this risk in Wallington and Portchester respectively, however the aim of this work is to reduce the risk of flooding to existing development. The risk of flooding will not be removed entirely and a residual risk will remain. Any new development proposed within areas at risk of flooding should only be permitted by exception if there are no reasonably available sites at a lower risk of flooding. We are concerned that the wording in the last sentence of paragraph 9.33 is contrary to this principle as set out in the NPPF. We would strongly recommend that this is amended to be in line with the NPPF. There would, in our view, also be merit in including a flood risk policy to provide clarity on the issue of developing in areas at risk of flooding as well as coastal erosion.

As mentioned above in the general comments we also strongly recommend that you include a water policy. The Borough has significant coastline and important rivers running through it. Protection and enhancement of these through development is essential. Fareham Borough Council has a role in helping deliver the aims and objectives of the WFD to ensure no deterioration of the water environment and enhancement where possible. Planning is a key way of contributing to these aims. Such a policy should ensure that development will protect and enhance the quality and quantity of groundwater and surface water.

Policies D5 and D6 in the design chapter talk about Water Efficiency and Water resources but this should not be in isolation. Water quality is intrinsically linked. In fact policy D6 to some extent talks about waste water disposal and water quality, especially in the supporting text where the River Basin Management Plan is mentioned along with the PUSH water study. Whether in the environment or design chapter, a more holistic water environment policy would provide a much better basis for the protection of the water environment in its entirety.

p.87 –Following on from the comments above regarding a flood risk policy, the section on coastal defences could be improved to better reflect the picture of flood and coastal erosion risk across the Borough (as set out in the River Hamble to Portchester Coastal Strategy for example), and more successfully integrate the spatial and flood/erosion risk management planning processes. By bringing clarity about the level of risk and the strength of economic case to deliver flood risk improvements, the Local Plan can begin to highlight potential opportunities for it to support flood risk reduction and vice versa.

p.92 – We feel that paragraph 10.13 is confusing to the reader as it confuses different aspects of flood risk management. If the intention is for this section to address several different ways of managing various sources of flooding, for example the sequential test, the sequential approach to development layout, and the design of site specific flood risk management measures (e.g. SUDS) then it needs to be expanded to address each of these issues in turn. Refer to our previous comments on inclusion of a flood risk policy. Otherwise it needs to be clear that this paragraph is referring only to the management of surface water flood risk within sites.

p.97 Policy D5 – We support the inclusion of the higher water efficiency standards in this policy this is important not only to help water supply but also for protection of the environment, both species and sites that rely on certain water levels to thrive. There are also key links with foul water disposal, the amount of water that is treated at wastewater treatment works and therefore the capacity of these works to accept new flows.

p.98 Policy D6 – we are pleased to see the inclusion of this policy but as discussed above we feel that it should be subsumed into a more holistic water policy that looks at water quality as well as resource. The policy actually makes reference to waste water and the supporting text considers water quality. We are especially pleased with the reference to the River Basin Management Plan. We do however feel that this should all be drawn together in a strong overarching water policy that provides strong guidance on how the water as a whole should be considered in new development.

p.100 – Infrastructure chapter – We are pleased to see that phasing is a key consideration in this policy. This may be especially important for wastewater disposal going forward. The PUSH IWMS should help inform this especially for the later stages of the plan period.

Site Allocations

We are pleased to see that the flood risk sequential test has been followed and all built development on sites is going to be located in flood zone 1 (lowest risk).

Site FTC4

Our records indicate that there may be a culverted watercourse below this site. This may need to be further investigated. Comments should be sent from Hampshire County Council as the Lead Local Flood Authority, regarding this.

Site HA8

We welcome the inclusion of bullet (j) in the development criteria which takes account of the source protection zones on and around the site. It is important that these are protected throughout all phases of development to prevent pollution of the water and potentially drinking water supplies.

Site HA16

We welcome the inclusion of bullet (i) in the development criteria which takes account of the source protection zones on and around the site. It is important that these are protected throughout all phases of development to prevent pollution of the water and potentially drinking water supplies.

Site HA19

As shown on the map for this site part of the site lies within flood zones 2 and 3. We are pleased to see that a development criteria has been included to specify that no development or site access should be within these areas. This will ensure the development and its occupants are not at increased risk of flooding.

Site HA20

We welcome the inclusion of bullet (i) in the development criteria which takes account of the source protection zones on and around the site. It is important that these are protected throughout all phases of development to prevent pollution of the water and potentially drinking water supplies.

If you have any queries regarding these comments or wish to discuss them further please do not hesitate to contact me using the details below.

Yours faithfully

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