

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2021/123019/01-L01
Your ref: APP/21/00189
Date: 24 March 2021

Dear Sir/Madam

OUTLINE APPLICATION FOR THE DEVELOPMENT OF NEW EMPLOYMENT UNITS TO PROVIDE UP TO 29,000 SQ M (GROSS INTERNAL AREA) FOR FLEXIBLE USE ACROSS USE CLASSES E (LIGHT INDUSTRIAL), B2 AND B8 WITH ANCILLARY OFFICES, CAR PARKING, SERVICE YARDS, DRAINAGE WORKS, LANDSCAPING AND ASSOCIATED WORKS TO PREPARE THE SITE FOR DEVELOPMENT. ALL MATTERS ARE RESERVED EXCEPT THE PRIMARY MEANS OF ACCESS TO THE SITE. BROCKHAMPTON WEST, HARTS FARM WAY, HAVANT

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position below.

Environment Agency Position

The proposed development involves the use of a non-mains foul drainage system which will require a permit under the Environmental Permitting Regulations (England and Wales) 2016. We do not have enough information on the proposed system and its impact to the receiving waterbody. We therefore **object** to the proposal as submitted.

Reason

The development is located in close proximity to Southern Waters Waste Water Treatment site, Budds Farm and 130m from a foul sewer line. The proposed discharge location is to the Hermitage stream, a designated shellfish waters, which then leads to Langstone Harbour which is a SSSI, SAC and SPA. The current WFD status of Langstone Harbour is Moderate (due to moderate ecological status). Langstone Harbour is used for a large variety of recreational and commercial water uses and as such receives a lot of public and media attention, especially centered on sewage discharges.

This objection is supported by paragraph 183 of the National Planning Policy Framework, which recognises that planning and pollution control are separate, but complementary, regimes.

Overcoming our objection

To overcome our objection the applicant should provide evidence of communication with Southern Water on the possibility of connecting to mains sewerage and reasons why the non-mains approach has been proposed. This information must satisfactorily demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This information should include:

- information on the volumes and proposed treatment method
- a foul drainage assessment on how impact to the environment will be minimised
- reasons for why a connection to foul sewer is not appropriate, this should consider costings, future development and feasibility
- breakdown of why 3 separate sewage treatments plants have been proposed over other treatment options.

This information should also be provided as part of the permit application to reduce the risks to people and the environment and obtain a permit.

We will not be able to determine a permit application until this information has been provided.

We recommend that the developer considers parallel tracking the planning and permit applications as this can help identify and resolve any issues at the earliest opportunity. Parallel tracking can also prevent the need for post-permission amendments to the planning application. We would welcome a joint discussion with the applicant and planning authority to discuss this further.

The permit is also likely to control the following emissions:

- Water quality determinants of the discharge
- Volumes of discharge

Further guidance can be found at <https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits>

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

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