

Written Deputation re appeal relating to Barratt Development of 195 homes at Sinah Lane
App/18/00724

Meeting 29 October 2020

Most people choose to live on Hayling Island (despite potential traffic problems) because they are attracted to the sea and the marine environment. They may be swimmers or sailors or simply like to walk on the beach. What they don't want is to see human excrement and 'sanitary products' washed up on the foreshore or in either of the two harbours that border the island.

The lack of sewage waste disposal capacity has been known for many years and Southern Water has been repeatedly fined for its incompetence in preventing pollution of rivers and coastal waters. A report by the Interim Assistant Director of Planning and Economic Growth for Portsmouth City Council on 11 June 2019 makes the following recommendations.

'The Solent has recognised problems from nitrate enrichment; high levels of nitrogen from housing and agricultural sources in the catchment have caused excessive growth of green algae (a process called eutrophication) which is having a detrimental impact upon protected habitats and bird species.'

'The Partnership for Urban South Hampshire (PUSH) authorities, Natural England and the Environment Agency jointly developed an Integrated Water Management Strategy (IWMS) (June 2018) to assess any implications from the region's planned growth on water resources and the quality of the water environment. The report acknowledged that there are significant uncertainties beyond the year 2020 relating to water quality, quantity, the capacity for accommodating future growth and the impacts on European nature conservation designations.'

'Since the PUSH IWMS was published, changes in case law mean that the water quality problems in the Solent have become an immediate issue for local planning authorities. A Court of Justice of the European Union (CJEU) decision, known as the 'Dutch Case' (in combination with the 'Sweetman' judgement) has implications for areas where the conservation status of a habitat type is already known to be "unfavourable" (as in the case in the Solent) and the authorisation of activities (i.e. new housing) which would add further nitrogen loading to that habitat (through additional sewage output).'

It concludes, inter alia 'There is therefore an argument that the planning system has scope to (and must) address the issue explicitly where new consents for developments could result in additional nitrate outputs. Natural England (NE), the government's adviser for the natural environment, advises that, under the requirements of the Habitat Regulations, the existing uncertainty about the deterioration of the water environment must be appropriately addressed in order for the assessment of a proposal to be legally compliant. They recommend that this is addressed by securing suitable mitigation measures to ensure that proposals achieve 'nitrate neutrality'.'

From a practical viewpoint Hayling Islanders are concerned about water quality. A local lobbying group Hayling Sewage Watch write 'Southern Water processes the human waste from 410,000 toilet users daily at their Budds Farm plant. Southern Water data says it processes 3.3 million litres of human waste (3% by volume of wastewater), on a daily basis.

Rainfall events that cause discharge into the local harbours are typically occurring 150-200 times per annum from nine outfalls in Langstone Harbour licenced by the Environment Agency. Around 30 of these per annum are a cause for significant concern to bathers at

West Beachlands where Southern Water necessarily must discharge a proportionate quantity of that human waste.

Some discharges are of very long duration; a recent discharge from the main treatment facility via a pipe 2m in diameter lasted for over 50 hours non-stop, causing pollution at West Beachlands detected by independent water quality testing (Not by Routine Environment Agency testing which is only carried out once per month).

I would also direct you to the BBC programme Costing the Earth in which Ellen Husain investigates the presence of pathogens in the marine environment. She learns how surfers and regular sea swimmers may be more likely to have anti-microbial resistant bacteria in their bodies, releasing sewage is one way in which antibiotics find their way into our oceans.

We may no longer be a member of the European Union but that should not be seen as an excuse to ignore directives relating to the environment.

Victoria Fox