

## Local Plan Hearings – statement by Rt Hon Maria Miller MP

### Issue 10: Environment

#### 20 The Environment

##### **20.2 Other environmental policies:** *Are the policies addressing water quality (EM6), for example in relation to the River Loddon.....justified and effective?*

Policy EM6 (Water Quality) is not sound. It is not positively prepared, as it is not consistent with achieving sustainable development; it is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, and it is not effective as the monitoring is inadequate.

It is a core planning principle, enshrined in the National Planning Policy Framework (paragraph 17) that planning should “enhance and improve the way people live their lives” and should “contribute to conserving and enhancing the natural environment and reducing pollution”. Chapter 11 of the NPPF sets out in more detail the way in which planning should conserve and enhance the natural environment. As detailed below, this policy fails to do this; it does not enable the delivery of truly sustainable development and is therefore inconsistent with national policy.

Policy EM6 states that the Council will work in partnership to protect, manage and improve the water quality. However, the Policy focuses entirely on preventing deterioration in Water Framework Directive band status, and completely ignores the question of deterioration within the band, or indeed of improvement.

Taken with the Statement of Common Ground between the Environment Agency, Thames Water and the Borough Council, it is clear that the policy of preventing deterioration in band status, relies on the tightening of phosphate consent level at Basingstoke Sewage Treatment Works (STW) to a level of 0.5mg/l. However, we understand that the STW is already operating at a lower discharge level than their current 1.0mg/l and indeed closer to 0.5mg/l, while the water quality continues to breach EU standards. This indicates that lowering the consent level will not protect the river from the significant increase in effluent that will result from higher housing levels. There is also conflicting evidence regarding whether further tightening is technically feasible or affordable.

The phosphate stripping trial at Basingstoke STW will run until March 2017, at which point the Environment Agency say that it may be possible to determine a likely timeline for when upgrades to Basingstoke STW would be required to prevent deterioration in the Loddon. In March 2017, the new Water Quality Monitoring Board (see below) should review the results of the trial and make a recommendation to the Borough Council regarding the impact this will have on sustainable development.

I am particularly concerned about the lack of ambition to improve water quality, rather than simply trying to ensure it does not further deteriorate. The policy needs to include a plan to improve the water quality of the Loddon, including clarification that the Council's long term objective is to take the River Loddon out of being in breach of the Water Framework Directive. The plan needs to include clear and measurable milestones. The Council should also articulate in its risk register the potential liability for being in breach of the Water Framework Directive, to ensure transparency for the public.

I am also concerned that monitoring will only pick up deterioration after it has occurred, and commitment to halt granting of planning permission at that point may be too late (ie the policy in SS4).

I would therefore propose that the policy should set up a Water Quality Monitoring Board, to include the Borough Council, Environment Agency, HIOWWT, water companies, and also community representatives. There should be quarterly monitoring, with reports to the new Monitoring Board.

#### Proposed amendments

In order to be sound, policy EM4 should include the following (amendments in italics):

“The council will work in partnership, *including with community representatives and environmental organisations*, to protect, manage and improve the water quality of the borough's water environment particularly the quality of water bodies which are currently failing to meet the WFD requirements.

“*The council will work with partners to draw up a plan for achieving its long term objective of improving the water quality, including clear and measurable milestones. The council will also ensure that potential liability for breach of the Water Framework Directive is included in its published risk register.*”

“The status of the water environment is monitored as part of RBMPs and the Environment Agency’s *monitoring process, which will be reported through a Water Quality Monitoring Board, comprising representatives from the council, the Environment Agency, water companies, and other environmental and community groups. The Water Quality Monitoring Board will receive quarterly monitoring reports on water quality and where monitoring reports indicate that there is likely to be deterioration in the overall status of the water quality,* Policy SS4 will prevent further development within the relevant catchment, and intervention measures will be required to improve the quality of the relevant catchment prior to the release of any further allocated sites or granting of planning permissions.”

Rt Hon Maria Miller MP  
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