

# Environment Reg 19

Submitted by: Anonymous user

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Name/Organisation

**Keith Herbert**

Email Address

[REDACTED]

1. What type of respondent are you?

**Member of the Public**

2. What Environment policy you are commenting on

**EV4 - Water Quality Impact on Solent Marine Sites (Nitrates)**

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

**EV4 4.4-4.5**

**EV13 g**

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

**No**

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No\_not\_consistent\_with\_National**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

**No**

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

**The planning strategy has no reference to intermittent discharges from Combined Sewer Overflows (CSOs) and their impact on water quality, bathing waters or nutrients. The policy does not put any safeguards in place to ensure that development does not increase the usage of storm overflows by adding more stormwater (or foul) to the combined or foul sewer network.**

**According to the Environment Act 2021 and Defra's storm overflow reduction plan [https://assets.publishing.service.gov.uk/media/6537e1c55e47a50014989910/Expanded\\_Storm\\_Overflows\\_Discharge\\_Reduction\\_Plan.pdf](https://assets.publishing.service.gov.uk/media/6537e1c55e47a50014989910/Expanded_Storm_Overflows_Discharge_Reduction_Plan.pdf) - All CSOs on the Isle of Wight will need to activate fewer than 10 times per year by 2035 at the latest. This means that any CSO activating more frequently than this will be illegal.**

**The Isle of Wight Council sewage motion (passed May 24) resolved to...**

- 1. Ensure that the new Island plan and Sustainable Drainage Systems (SuDS) supplementary planning document fully considers the cumulative impact of surface water runoff and sewage discharge.**
- 2. To take a positive and proactive lead on this issue and work with stakeholders to ensure that sewage releases into the sea surrounding the Isle of Wight are zero by 2030.**

**I do not consider any of the above policies/commitments to be currently met in the planning strategy.**

**EV4 only references continuous discharge from treatment works. I think there should be a dedicated section in EV4 to cover how the planning strategy can be implemented without increasing the activation (or better still, reducing the frequency) of CSOs.**

**My suggestions would be...**

- 1. A total ban on stormwater connections into foul only systems.**
- 2. A ban on stormwater connections into combined systems when the downstream CSO activates more than 10 times per year.**
- 3. If the downstream CSO activates more than 10 times per year, the developer has to contribute to impermeable area offsetting and/or network reinforcement (similar to the s.19 flooding section).**
- 4. Mandatory SuDS for all development.**
- 5. Resource committed to enforcement.**

9. Do you have any comments on the policies map?

**No**

11. Do you wish to request to appear at the hearing sessions that will take place?

**Yes**

12. Please outline why you would like to attend?

**I think the team have done a fantastic job. They need commending.**

**Perhaps some technical support is required on such a complex and emotive issue.**