

Deputation Submitted by Mr Owens

There continues to be failure by HBC to address serious current concerns about nitrate calculation, management and monitoring. Circumventing nitrate neutrality regulations with a truly “experimental” credit scheme with unproven scientific credentials is complete **madness!** HBC could unwittingly be creating an unsustainable and damaging legacy for future generations that fundamentally cannot be undone!

Barratt’s nitrogen calculations are seriously misleading! Southern Water data demonstrates each person connected to Budds Farm generates 265L of wastewater daily; yet Barratt is using an aspirational target of just 110L (that’s 60% less!!) Condition 20 [2] requires Barratt to demonstrate it can meet 110L before occupation – so how have Barratt demonstrated compliance?

Barratt is claiming a headline-grabbing -167.973 Kg/TN/yr when it should be reporting **nett contribution** of +23 Kg/TN/yr. HBC analysis failed to detect this anomaly.

The Ricardo report [1] makes authoritative statements about nitrates relating to Chichester Harbour; yet the same report **failed to demonstrate** how (and where,) nitrogen concentrations are being measured here. A significant contrast with the Langstone Harbour case, here, there is considerably more detail outlining sampling locations, complex statistical data analysis and charts. Where is all the complex data tracking and analysis for the similarly challenged Chichester Harbour? Chichester Harbour, afterall, hosts the Warblington Farm nitrate credit scheme central to HBC’s development ambition.

The EA says that both harbours are considered a single body of water, so why do different rules and monitoring standards apply individually to each harbour? This approach hardly demonstrates scientific rigour!

Monitoring the effectiveness of all nitrate mitigations for our harbours is **vitaly** important, underpinning the whole point of the neutrality exercise.

SUDs on this and future sites are headlined to be helping our sewage system. However, the reality is that this approach actually makes the situation worse for Langstone Harbour (a Ramsar site) in terms of faecal pollution. Frequent faeces-laden discharges into the harbour will continue to occur because of the already built conurbations and their current drainage arrangements. Continued non-SUDs development within the Budds Farm catchment area means these discharges will actually become more frequent! The difference SUDs makes is the removal of drainage water from the sewage system. Crucially, the volume of human waste in stormwater will therefore **proportionately increase** making discharges into the harbour more **toxic** from pathogens found in human excrement and **not less toxic!** Conceptually, SUDs being the saviour of sewage difficulties is **100% wrong!** Only a complete separation of street drainage and household wastewater will fix this which could take multiple decades!

It is fundamentally myopic to consider just one development in isolation within the context of SUDs, sewage provision, nitrate pollution, A3023 capacity and general infrastructure. What is missing here is a holistic approach.

The council's position on this continues to be unequivocally and indefensibly **unsustainable**.

With the A3023 arterial road already beyond its design limit. With sewage and water supply frequently and publicly failing. With access to medical services under sustained and significant pressure. With **1300** homes planned for Hayling and with the stealthy accretion of an additional unplanned/unaccounted for 1500 Hayling windfall homes currently running at ~100 per annum.

With clear NPPF non-compliance in respect of infrastructure planning, Hayling's community will quickly be subjected to:

- **Irreversible** A3023 Infrastructure **FAILURE (Gridlock)**
- Sewage infrastructure **FAILURE (Pollution)**
- Water infrastructure **FAILURE**
- Health Service infrastructure **FAILURE**

HBC continues to fail to recognise and manage the fundamental effects of cumulative development on our infrastructure; this demonstrates an irresponsible and reckless approach to infrastructure load planning. This **MUST** be recognised/corrected immediately before irreversible damage is inflicted on Hayling's community contrary to the NPPF.

HBC has received and disregarded competent and justifiable comments on its Transport Assessments by an internationally recognised authority on road infrastructure. The HITA is fundamentally flawed and must **absolutely not** be informing any planning practise without revision.

The Sinah Lane development *on its own* will not cause infrastructure failure! However, if HBC continues to **deliberately** allow cumulative development without a composite plan that considers the inevitable gridlocking of our transport link then it will damage our community in perpetuity - **no economic recovery will ever be possible!**

The NPPF is unequivocal. Planning Authorities have a duty to uphold NPPF requirements to ensure that communities are not adversely affected by their decisions. This particular development clearly demonstrates **unsustainable infrastructure loading**.

I urge the committee to comply with the NPPF and **discontinue** its dogged approach to dismiss any pertinent issues associated with our A3023 capacity and nitrate offset management. HBC continues to destroy our island community; this is unacceptable.

Word Count = 750 (does not include the references below)

Author Mike Owens.

References:

[1]

Nutrient Neutral Development review 2020 June FINAL

[2]

<https://havant.moderngov.co.uk/documents/g11328/Public%20reports%20pack%2010th-Mar-2021%2017.00%20Planning%20Committee.pdf?T=10>