

# Supplementary Planning Information

HAVANT BOROUGH COUNCIL  
DEVELOPMENT MANAGEMENT COMMITTEE  
29 October 2020

I am now able to enclose, for consideration by the Development Management Committee on 29 October 2020 , the following supplementary planning information that was unavailable when the agenda was printed.

## **Agenda No    Item**

- |             |  |               |
|-------------|--|---------------|
| <b>3(1)</b> | <b>Application APP/18/00724 - Land at Sinah Lane, Hayling Island</b>   | <b>1 - 30</b> |
|             | Proposal:           Erection of 195No. dwellings, associated open space, pumping station, sub-station and formation of new vehicular access off Sinah Lane. Change of use of land from agricultural to a Wader and Brent Geese Refuge Area |               |

[Additional Information](#)

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# Agenda Item 3(1)

Anne Skennerton on behalf of Hayling Island Residents  
Deputation to DMC 29-10-20  
Application APP/18/00724 - Land at Sinah Lane, Hayling Island

**Note:** page numbers refer to those on document's foot of page not necessarily the online page number.

**HITA** is Hayling Island Transport Assessment

**ESCP** is Eastern Solent Coastal Partnership

I'm speaking for Hayling residents who feel this Application is premature; our residents are not confident that this site can provide the right homes in the right places at the right time. Out of 550 representations, 456 common sense objections - only 1 in support - are a fraction of those suffering Hayling's A3023 gridlock forcing many employed to leave the Island.

There is insufficient evidence that this intensive housing development can be economically sustainable (1) for both those who can afford to buy them and those renting the affordable homes whose prices are often driven up by investors. Council Officers (2) cite need for "supporting economy" and "local circumstances should be taken into account...for different areas" (3). But where is the new employment on Hayling for the proposed 195 families with potentially 2 adults needing to drive/commute off-Island for work and, like many, opting to school their children off-Island? In the Council's Evidence Base neither "A Regeneration Strategy for Havant" nor Hayling Island Feasibility Study (4) provides current, imminent sufficient sustainable employment to avoid off-Island or even out-of-Borough commuting. Please also note that Havant has "the second lowest job density figure in Hampshire" (5) so new residents add to the heavy commuting load on congested A27 and A3. Hayling's marinas and leisure facilities can't provide sufficient local work. Our young people travel to mainland colleges and employment.

These are "material considerations" (6) indicating the need not to approve this Planning Application until we have clear evidence for new employment locally plus sustainable, effective transport network in place – at the 'right time'.

HITA unfortunately fails to provide such fundamental "material considerations" as: what is the actual cost of the proposed traffic 'mitigation'; is that money available now in order to make the necessary changes before new housing developments add to the Island's existing infrastructure problems: what is the evidence that known future flooding will not impact on the proposed mitigation strategies? Common sense tells us that roundabouts and traffic lights will not solve even the current sometimes dangerous gridlock caused by accidents or utility problems, affecting our single bridge access, impacting residents' work, study, hospital appointments and daily emergency vehicle access for half a day or more. This occurs throughout the year, regardless of the additional estimated 5,000 annual visitors. Without substantial road changes in advance, large-scale developments will accelerate A3023 gridlock; why then should visitors continue to spend their £190 million (7) coming to Hayling?

For new housing to be built, there must first be more than a promised 'interest' in an autonomous vehicle bridge (8) and this needs to be published with supporting detailed evidence in order to build public confidence. Whilst a new so-called 'bridge' sounds attractive, autonomous vehicles are still experimental (9). What factual study of all Hayling's residents and visitors proves viable uptake, and evidence of exactly how much parking area will be provided – will we lose all or some of the Billy Trail immensely popular for visitors' and residents' health and recreation? Wouldn't this destroy an existing green, environmental area that Government policies require? Exactly how would this link, as claimed, to Havant's Rail Station through Langstone's housing and the A3023? If this autonomous link meets the Billy Trail, how does this fit with HITA's plan for the Trail's use as "emergency access route"(10) – and the Trail's Heritage status (11)? Even Council's "Transport Survey" (12) reveals respondents' desire to use the Billy Trail for cycling/commuting. The Transport Evidence Base is seriously confused.

Autonomous 'interest', inserted into the "Evidence Base" for Hayling's 'Regeneration' is another "material consideration" whose lack of foundation – no supporting evidence, no costing, no time-scale – underlines the real importance of infrastructure before housing developments.

It's vitally important to understand that rising sea levels and Met. Office predicted tidal surges, all accepted by the Council's Eastern Solent Coastal Partnership, continue to dramatically reduce Hayling's coasts. West Beach, designated for Seafront Regeneration's watersports/leisure jobs (13), has eroded beyond ESCP's 2019 expectations for the next 20 years. Current, short-term shingle replacement (14), disguises West Beach's phenomenal erosion: beach huts removed, most of the parking lost, municipal golf club metres away from tidal surges, Inn on the Beach and Hayling Golf responsible for their own sea defences but their positions increasingly tenuous. The Evidence Base planned tourism revenue and new jobs for West Beach, with no planned coastal intervention (15), is without foundation.

Right homes at the right time: please refuse this Application until essential infrastructure is in place.  
(Word Count 743)

#### Footnotes & References:

1. Required by Government: Gov.uk Sustainability Plan Sec.3 Goals; NPPF 2019 Sec.2 Para 7 & 8a p.5
2. Public Reports Pack p.9 Sec.4 paragraph 1
3. Government's National Planning Policy Framework 2019 Requirement
4. Local Plan Evidence Base Hayling Island Feasibility Study 2019 Sustainability Appraisal Appendix H; A Regeneration Strategy for Havant Borough p.5-7,11, p.17
5. Local Plan Evidence Base Regeneration: "A Regeneration Strategy for Havant Borough" p.25
6. Public Reports Pack Sec.4 paragraph 1
7. Local Plan Evidence Base Hayling Seafront Regeneration Analysis and Feasibility Study Jan 2019 p.4 Sec. 1.2
8. Local Plan Evidence Base Regeneration: "A Regeneration Strategy for Havant Borough" p.17 para. 4
9. MIT Technology Review May 2020; Association of British Insurers and Thatcham Research UK 26-10-20
10. Local Plan Evidence Base Hayling Island Transport Assessment Addendum Jan. 2020 incl. Appendices p. 16 (p.17 online)
11. Visit-Hampshire Hayling Billy Trail; Shipwright's Way 50 mile cycle walking route Hampshire; Local Plan Evidence Base Hayling Seafront Regeneration Analysis and Feasibility Study Jan 2019 p. 18 Sec.4.4.2
12. Local Plan Evidence Base Transport, Hayling Island Transport Assessment, Travel Questionnaire Results pp2,4,5,8-11 from 1,368 Hayling responses.
13. Local Plan Evidence Base Hayling Seafront Regeneration Analysis and Feasibility Study made in Jan 2019 pp 24ff Sec 5 Urban Design Opportunities
14. Online ESCP North Solent Shoreline Management Plan 2020, Frequently Asked Questions, Key Messages & Policy Options; and Final North Solent SMP Document and Policy Statements see Grid 5AH105 for policy for Hayling's south coast.
15. Online Eastern Solent Coastal Partnership: Hayling Island Coastal Management Strategy 2120 – Preparing for a Resilient Future Story Map depicts a) West Beach b) Coastal Flood and Erosion Damages Over Next 100 years

Dear Councillors

Firstly, may I thank the officer for her thorough report. I should outline why we felt the need to submit an Appeal. Members will recall a committee was due on March 26th, although previously we were expecting to go to earlier Committees but were delayed several times due to the Transport Assessment Addendum. Given lockdown however we recognise the Council had to defer. We agreed extensions to the end of May, but unfortunately after 2 years, and with no firm 'virtual' committee, we couldn't extend any further, as we had a contractual obligation to Appeal if not determined by 31st May, having extended on numerous occasions. So the Appeal partially arises from the circumstances we have all faced, and is not entirely a criticism of the Council. We have continued to liaise with officers and as the report explains, agreed some amendments to improve the development, whilst progressing the Section 106.

On the substance I'll draw out 5 points.

Firstly, principle. This site was first chosen by Havant in 2016, and has been in every subsequent draft Local Plan, including that approved at Full Council just weeks ago. This recognises the site's closeness to facilities, relationship with existing development, and the need for a spread of sites including on the Island. For some time the Council had earmarked the site for 210 dwellings, but the policy now reflects our proposals.

Secondly I'd stress the urgency of this scheme given that, as the officer acknowledges, it is necessary to maintain a 5-year supply. But this is not about arithmetic, it is about real people's lives, at a time when the need to have space to live has been shown more than ever. Through this development Barratt will provide 58 homes in affordable tenures; one of the biggest single contributions in the Island's history, and 137 further households will benefit from ownership.

Thirdly transport. We realise highway conditions on the Island are difficult, and this is why even before Covid-19, we accepted over a years' delay as the Council undertook its further Transport Addendum work, and identified and approved mitigation packages. Arising from both HCC Highways and your officers' hard work we have agreed a Section 106 package including over £700,000 worth of highway and walking contributions for the Island.

Fourth, the economic and social benefits are substantial. Development investment on this scale, and in this location, is rare. And the boost to jobs is all the more important in the current downturn. We will also (over and above the highway packages) be contributing over £1.7 million pounds in Infrastructure Levy, an education contribution of £872,000, plus sizeable contributions towards Health, a community worker, and the Billy Trail. Combined, these will provide real benefits across the Island.

Fifth and perhaps most importantly, the environment. About half of the application site will go to the RSPB as Winter Bird Mitigation land, in perpetuity, and the Section 106 for this is well advanced, ready for signing subject to the Inspector's independent review. The Application is able to create biodiversity "net gain", and unusually for a large site in Havant, is Nitrate Negative. For these reasons there is no objection from Natural England or the County Ecologist. Our approach to drainage has also been accepted by Havant, Hampshire and the Environment Agency. Combined with other measures on energy efficiency, electric charging points and landscaping, the development is sustainable.

So I commend the officer's recommendation.

Although this application will be decided by an Inspector, and we share your frustrations that Committee was unable to make a decision in March, what Members resolve tonight is still important. There are few areas of disagreement and if the officer's recommendation is carried we can expect a Hearing, where the Inspector will chair a structured discussion, involving the public. Alternatively if Members reject advice and introduce Reasons for Refusal, this could prompt a costly and needless Public Inquiry running against the Local Plan and the Council's corporate aims.

If the Committee votes to support the Officers' Recommendation, we would work with the Council and submit a fresh application while we await the appeal. Given delays with the Inspectorate currently, the new scheme could be determined early in the New Year before the appeal takes place, saving the Council time and money. Hence, I will conclude by saying that we are receptive to hearing Members' considered views on any revisions to the application that they may wish to see, if we took that approach.

Thank you.



Re: App/18/00724 New Buildings proposed at Sinah Lane

- Building on any greenfield site on Hayling will increase stormwater runoff and produce more sewage.
- The current sewage treatment facility is already inadequate.
- Increase of traffic
- No one on Hayling wants the buildings
- Change in a sense of place this development would impose.

Building and paving of any sort is known to increase stormwater runoff and while it can be somewhat mitigated it is never preventable. The ever-increasing storms expected from climate change a major concern. This runoff usually will contain anthropogenic pollutants that will have a detrimental effect on the surrounding seas. Since much of the water surrounding Hayling is protected any project that increases runoff could be held accountable.

Much of this runoff is sent to Southern Water, the company responsible for treatment of sewage in the Hayling region. Southern Water has already shown itself to be inadequate in its services. They are considered the worst sewage treatment company in the UK. The Environmental Agency denotes them at 1/5 stars, and they have been fined over a million dollars for not fulfilling their responsibilities. The proposed building site says it will produce 9.1 litres of sewage/second (see document produced by Barrat) which is 786,240 litres/day. Sending this sewage to a company that already is unable to deal with what they receive would be criminal. SW releases raw sewage on a regular basis into the sea. The argument that the sewage is diluted hence not a problem does not hold up. Many of the chemicals in sewage bioaccumulate which over time can have detrimental effects on populations of organisms.

The impact of the nutrient rich sewage is revealed by the increase of algae in both Langstone and Chichester Harbour. People argue this is from farms. However, agriculture has taken place in this area for centuries and the algae, an indicator of nitrate pollution has increased dramatically in the last ten years. The algae will have an effect on all the organisms associated with the sea including birds. The sewage may also affect water sports people on the island's beaches and considering Hayling is a major destination for windsurfers, kites, swimmers, sailors etc... the release of sewage is unacceptable and adding to this sewage by increasing the runoff and sewage through development would be criminal.

We are facing a world threatened by a huge reduction of species and climate change. The proposed development will only worsen these. Building obviously affects wildlife but also the increase of runoff will affect the beds of seagrass that surround the island. These are already impacted by the increase of algae. Seagrass has been shown to be more effective than forests in absorbing carbon, so reducing these beds is not the way forward.

An issue frequently not recognized is the sense of place of a geographical region. This is important for the wellbeing of the current residents of the island. People live here because of its rural beauty, farming and wildlife. Any large development will change the place and it would be impossible to regain it.

I hope the Committee understands the importance of these issues and make the appropriate decision.

Sincerely,

Beth Hawdon

MSc Environmental Science, ISO 14000



**Cllr Clare Satchwell – Ward Councillor Hayling West**

Written Deputation for DMC 29<sup>th</sup> October 2020

Application APP/18/00724 - Land at Sinah Lane, Hayling Island

You will all have heard many times that Hayling Island is unique. The primary reason for this from a planning perspective is the road network and the impact that the one road on and one road off has. This road causes issues far and wide and so the only way to look at the sustainability of development on Hayling should be holistically.

You are going to be asked to make a decision that affects tens of thousands of borough residents. I will attempt to highlight the primary reasons why this application should be refused permission by the Development Management Committee today.

There is no question that officers have worked incredibly hard to try and find a way that in their opinion tips the planning balance to the recommendation to grant permission but it is this level of complexity that forms part of my reasoning that this site cannot and should not be considered alone.

Does this development meet that test or if it is only the **fear** of the implications of the potential lack of five year land supply that has potentially tipped the balance which has led to this recommendation?

I urge you to read the more than 400 submissions by residents about this application who are terrified that the lack of infrastructure, damage to our wildlife and ecology, flood risk, and transport issues combined create an unsustainable development that if granted cannot be un done. We need housing but at what cost? we must get it right.

## Transport

Whilst it is not the local plan on trial the Hayling Island Transport Assessment (which forms part of the emerging local plan) informs this application. The TA is just that an assessment, there are no firm decisions it is an assessment of the situation and includes information for example about how the Hayling Billy trail 'could' be used but it also identifies for example that there is no plan in place for it's long-term maintenance or any feasibility to some of the 'ideas' it suggests.

If we were looking at the Local Plan in front of the inspector, then we he or she would be able to look at the island as a whole and review their comment from 2013 (albeit pre NPPF)

***"I concur that growth on Hayling Island should be limited/restricted, to take account of flood risk, the need to minimise impacts on the natural environment of Chichester and Langstone harbours and access difficulties on the local road network at peak hours".***

More alarming is the lack of scrutiny and independent review on the Transport Assessment Addendum. It took a call in of a cabinet decision (one of only a handful **since 1974**) by me and other colleagues to even get it in front of the OPS board who has been denied the opportunity. The board were tightly controlled by rarely used unfamiliar process (due to the nature of the call in). We were lucky to have a professor in attendance, but he was given 2.5 minutes to address the committee and strict rules were applied which meant that no questions could be asked of him.

It is disappointing that this extensive officer's report for this application that mentions the Hayling Island Transport Assessment more than 42 times does not mention that the addendum was not made available for scrutiny and there was very limited public involvement.

A couple of days after the scrutiny meeting to everyone surprise a technical note was issued which sought to answer the initial questions raised and the addendum was published. There was no inclusive process and opportunities to inform the assessment were missed.

## **Transport continued**

Many residents have asked me what in real terms will be delivered to improve the road network by developer contributions relating to this application. The extensive officers report sets out what could be delivered but there is nothing confirmed therefore no timescales. There is no evidence to support the improvements that what could be implements will offer.

In the technical note issued on 15<sup>th</sup> March 2020 following the call in of the cabinet decision to publish of the transport assessment says

***The HITA concluded that with new development but without mitigation, the local plan proposals would lead to a cumulative severe impact on the road network. However, with a costed and proportionate mitigation package, new development can be accommodated on the road network without a cumulative severe impact.***

Why does this application not inform residents and indeed this committee what will be done and when it should be done? How can we be sure that there is enough money to deliver anything meaningful that will mitigate the severe impact described by our planners. I recommend reading the highway conditions in the officer's recommendation which may help you understand why residents are so alarmed.

Details of the proposed funding by the developer is below (taken from the TA addendum). Most of the money would go in to the CIL pot and there is nothing to guarantee that it would have to be spent on Hayling Island.

| <b>Type of funding</b>   | <b>Amount</b>     |
|--|-------------------|
| Community Infrastructure Levy  | £1,708,219        |
| Direct contribution (through S106) to improvements along the A3023 corridor up to, and including, the A27 roundabout | £679,000          |
| Walking route from the development to Mengham Infant and Junior Schools  | £35,000           |
| <b>TOTAL:</b>  | <b>£2,422,219</b> |

## **Brent Geese & Wildlife**

Case law and guidance has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether to grant planning permission. There seems to be inaccuracies in the application which suggests for example that E26 is adjacent to the onsite refuge when in fact it is not.

Barratt homes recently developed another site 'The Oysters' and at that time the site that we are reviewing now was identified for refuge. It seems it is perfectly acceptable to keep moving these birds on when there is money to be made.

The RSPB is mentioned 52 times in the officer's report and the RSPB says

***'The application site lies within 150m of Langstone Harbour to the west, designated as a Site of Special Scientific Interest (SSSI), and forming part of the Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site in recognition of its national and international importance for wildlife, including wintering waterfowl and breeding seabirds.'***

Due to the amount of work to attempt to address this issue and the fact that even now the report is not correct it must raise the question, should we be building on such a significant site? How sure are we that we are really offering protection to these important birds?

## **Infrastructure**

Infrastructure is of particular concern. The Southern Water network regularly fails on Hayling Island and this development would make the problem worse. For this application, sewage would end up going through the infamous Stoke pumping station which has led to raw sewage ending up in peoples houses, gardens and Langstone Harbour. Problems are not limited to Stoke, lorry's manually pumping sewage out of the sewers is a regular and unwelcome sight. Due to the age of the Islands sewage network roads are often closed for weeks and months due to failures in the network. Budd's farm the processing site for sewage fails regularly, and evidence of raw untreated sewage is a plenty for users of our harbour and beaches. Our residents in the borough need existing issues and capacity to be fixed before we potentially add additional housing on this site that is perched just 150 metres from Langstone Harbour.

## **Infrastructure**

The Flood Risk Assessment published in March this year, raises many issues. It confirms Southern Water has rejected any future involvement in the SuDS on this site, it also shows that Langstone Harbour will now be the destination of water drained from this site.

## **Hayling Island Coastal Strategy & Flooding**

In 2022 the ESCP Hayling Island Coastal strategy is anticipated. This strategy will be invaluable in helping to understand whether further development on Hayling Island is sustainable. Surely a flat Island with little or no flood protection needs this to truly make an informed decision on whether development is sustainable?

## **Nutrient Neutrality**

This site is located next to Langstone Harbour which is one of the areas the new policy is ultimately designed to protect. The new idea of offsetting has unknown results.

The Solent is an area of particular concern and it is unclear how the success of these schemes will be measured and monitored.

## **Prematurity**

The level of complexity (and hard work by officers) demonstrates why this site cannot be decided on its own. It needs to be considered as by an inspector as part of the examination of the local plan with community involvement.

If permission is granted the opportunity is lost, either for a development that is truly in keeping with its surroundings or one that has integrity at its heart and factors in the long term wellbeing of potential residents that may occupy it.

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## Deputation by Councillor Gary Hughes – Cabinet Lead for Planning

Members of the DMC, you will have read the officers report, recommending approval of this planning application.

I also have read the report and have spent many hours on the planning portal reading the objections. They primarily focus on traffic, access to local services and schools, and the threat of potential pollution problems in Langstone Harbour.

Firstly, I strongly believe that we have a moral obligation to build houses to meet our housing need, not just for our young people. It is worth pointing out that today, we have twice as many bedrooms in our borough than we need in 2037. However, those bedrooms are in larger houses (3+ bedrooms) often on very large plots, frequently occupied by individuals/couples who have spare rooms. We cannot force those individuals to downsize to smaller properties, thereby freeing up their property for greater occupancy. By facilitating the building of a mix of properties; flats, one bed roomed, two bed roomed (our greatest need), three bed roomed properties etc, we will create flexibility in the offerings across the borough and hopefully enable people to occupy and own their own home in a location of their choice.

The Hayling Island Transport Assessment Addendum is a detailed piece of work. As an impartial observer (I wasn't involved in its generation, analysis, conclusions and recommendations) I am not in a position to critique the content per se. I would, however, make the following observation; an assessment is just that... an assessment, based on limited real-time analysis, modelled and extrapolated over time. The Traffic Planning Appendix for the Major Development Area (MDA) to the West of Waterlooville delivered in 2010 comprised 1046 pages and was 10 times larger. Seventeen junctions were subjected to real-time analysis over a three-day period during the summer of 2009. From that data and additional modelling, detailed traffic assessments forecasting the expected increase in traffic were extrapolated out to the year 2021. A series of 'triggers' based on the number of housing completions were set out in the Section 106 agreement requiring modifications to the 17 junctions to accommodate the increased traffic. **What has become apparently clear is that the modelling when compared to actual traffic was inaccurate.** So much so, that there has been significant engagement with Hampshire Highways and the development company to get the completion figures increased before the triggers have been initiated. Additionally, and critically, the local residents' association has been able to influence the sequencing of the works at specific junctions, thereby using local knowledge and insight to assist highway planners in making adjustments to the local roads network that are timely, appropriate and strategic. As you may know, I have taken on the Chair of the Hayling Island Infrastructure Advisory Group (HIIAG). In my introductory communication with the civilian representatives, I proposed the above approach as a role for the group; making use of their local expertise and knowledge to shape infrastructure adjustments. The modelling used to develop the HITAA is based on two timelines; today and 2036, similar in approach to the MDA modelling work.

The HITAA highlights a series of interventions (package M1A) that could ameliorate the 'friction' and 'shockwave' events that occur on the A3023. In respect to the proposed

development at Sinah Lane, Developers Contributions in the form of Section 106 payments (approx. £679K) and Community Infrastructure Levy (CIL) receipts (approx. £1.7M) could fund these works.

One of the criticisms of the traffic assessment addendum is that it did not take into consideration 'real time traffic' during peak summer months and at weekends. This summer has seen record numbers of visitors to the island. It has been described by some locals as the 'busiest for thirty years'. There are three permanent traffic counters on Hayling Island. A3023 Langstone Bridge, A3023 Mill Rythe (outside schools) and West Lane (south of Brights Lane). I have seen the raw data from a ten-day period between 1 Aug - 10 Aug. The data covers vehicle type, volume (numbers), speed (including mean speed) for each hour and a 24hour total. The raw data shows that traffic flows for the whole 10 day period were very good. As you would expect, average speeds were slower during high volume periods compared to low volume periods. I am sure there will be many accusations of .... What does he know, he doesn't live here! In my Cabinet role, I have been making regular trips to Hayling Island, particularly West Beach since June 2018. It has become my norm since May to note the time to/from the junction with the A27. The time for each journey in either direction has always been between 11 and 14 minutes.

Many of the comments relate to the potential for the increase in 'pollution' into Langstone Harbour as a result of this development.

- Did you know that Langstone Harbour is not a European Designated bathing water?
- That locals have commented that it is cleaner now than it has ever been?
- Did you know that before the year 2000, all Portsmouth sewage was pumped straight into the Long Sea Outfall untreated?
- Despite this, that Hayling Beach has been awarded the Blue Flag status for the past consecutive 29 years and has had 'excellent' bathing water
- Did you know that even 'excellent' bathing water can have up to 825 poo bugs per 330ml (the average coca cola tin)?
- That the treated water pumped into Langstone Harbour from Southern Water is cleaner than the water it is going into?
- Did you know that only 3% of household waste contains solid matter the vast majority is water from toilet flushing, kitchens and bathrooms?
- And during storm water releases that the percentage of solid matter would be less than 0.1% but is in fact screened to remove that solid matter before discharge?
- Budds Farm and Thorham WWTW receive a combined total of 800kg of nitrogen loading each day, of which 130Kg is released in the final effluent. This is 21% below the maximum permitted. We should not forget that the two greatest causes of nitrogen in both harbours is surface water run-off and from the marine environment (it comes in on the tide).

Sustainable development has three pillars; social, economic and environmental. I do believe that this development meets all three pillars; who are we to say people can't live in their own home? The environmental challenges can be addressed and I do see a role for an upgraded flood resistant fully available Hayling Billy Trail. And finally, at the macro level, economic



growth through house-building and investment will enable Hayling Island to evolve to meet the demands of locals and visitors alike. I hope you support the recommendation before you.

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## DEPUTATION FROM SAVE OUR ISLAND TO THE DMC MEETING 29 OCTOBER 2020 RE APP/18/00724

The initial revision of the Local Plan recognised the unique set of infrastructure constraints on Hayling Island and the need for a composite strategic Infrastructure Plan covering the whole Island.

In 2013, this was reinforced by the Inspectorate with the view that:

*“I concur that growth on Hayling Island should be limited/restricted, to take account of flood risk, the need to minimise impacts on the natural environment of Chichester and Langstone harbours and access difficulties on the local road network at peak hours”. [Extract from paragraph 9 of the Inspectors Report].*<sup>1</sup>

However, development continued unabated, and the plan for 660 houses increased to over 1100.

In 2017, HIIAG was formed to advise on all aspects of Infrastructure on the Island. Recognising the unique infrastructure issues on the Island, the decision was taken to undertake a separate TA for the Island’s road network.

The TA was completed in January 2019, however the HIIAG representatives were excluded from the process despite promises to include them at every stage and educate the group members on the modelling process. The TA was not accepted by the Council who required more detailed studies to be undertaken under the Satchwell Amendment. This resulted in a TA Addendum; HIIAG and the HI Councillors were again excluded from the process. The TA Addendum, on completion, was ‘called in’ for scrutiny. At no stage have the TA or the Addendum been subject to an independent analysis. At the meeting, the only independent expert, Professor Nick Hounsell, was given just 2 ½ minutes to present his findings. Nick is a resident and is an internationally-recognised expert in the field. His considerations have been provided to you in a separate document.

The Scrutiny Board identified areas requiring further work to be undertaken. However, the TA Addendum was signed off as “complete” on a technicality leaving the Board’s issues unresolved and the major deficiencies of the TA remaining.

The capability of the single access route (A3023 and bridge) is fixed as there are no economic options for expansion, and the plan for 1100 houses is not to be considered any way a limit. Therefore, our recommendation that a detailed flow/capacity analysis is essential as the only way to understand how many houses can be supported by the road infrastructure over time, and to assess the ramifications for the emergency services, police, public transport, Southern Water’s back-up service, and the Island’s economy.

As there is no intention to limit housing or leisure traffic, the scant infrastructure planning horizon of 15 years is not justifiable or sustainable.

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<sup>1</sup> <https://www.havant.gov.uk/sites/default/files/documents/Windfall%20Background%20Paper%202013.pdf>

The mitigation measures designed to smooth intra-Island traffic flows will cost millions. We should know exactly what the costs are, the funding sources and the implementation plan. These measures will further degrade the performance of the A3023, and the TA assertion that the mitigation measures reduce the impact to 'under 'severe' is wrong. There is no published definition or calculation advice available so HBC cannot claim this – there is no proof !

### **Land on Sinah Lane**

Because of its position, the Sinah Lane site requires two separate pumping systems: one for waste water (sewage) and one for surface water (roads, gutters, etc.) These present single points of failure and a real risk of cross-pollution. The SW waste water system is a network of 15 electrically-powered pumping stations each with a small storage tank (16 with this application.) These all route through to the Stoke Station, which connects via a single pipe to Budds Farm. This network has no alternate route and must operate 24/7. Blockages are common (over 100 a year) and power outages, breakages and pump failures occur frequently.

The well-exercised back-up process is a stream of sewage lorries (up to 20 have been used) to pump out the contents of the affected stations and transport it to Budds Farm. This continues until the emergency is over. Unfettered road access is essential for this to work. Failure results in waste water flooding followed by harbour pollution events.

These proposals should be expanded to detail a contingency plan, back-up systems and alternate power sources. The risk here is not just to the local area but also to Langstone Harbour. The large above-ground SuDS lake discharges into the ancient deep ditch surface water network, and thence to Langstone Harbour. The process for monitoring the SuDS water quality and the maintenance of the whole route to the EA one-way valve to the harbour must be defined.

At this stage it is premature to take any decisions on this development until HBC and ESCP have resolved the outstanding issues.

Dave Parham  
Save Our Island Group

Planning Development  
Havant Borough Council  
Public Service Plaza  
Civic Centre Road  
Havant  
Hants PO9 2AX

27<sup>th</sup> October 2020

**Ref: App/18/11724 Erection of 195 No. dwellings, associated open space, pumping station, sub-station and formation of new vehicular access off Sinah Lane.**

Dear Planning Services,

It is interesting to look at the simple search for Sinah Lane on the planning applications portal – they are mainly for single storey extensions, minor property improvements, TPO and even a swimming pool. The most recent is for conversion of a bungalow to a detached house. The application for 195 dwellings (mainly flats) sticks out like a sore thumb in this rural area.

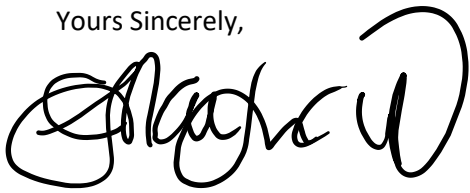
This development has consistently struggled to make any headway. I have addressed my concerns previously and would recommend that the development is rejected outright as there is a severe lack of evidence of compliance from the developer and a clear intent to purchase support. I have detailed some of my previous objections below:

- The properties are not a low carbon design and this is a major conflict with the Government requirements for climate change.
- There is no clear information about regeneration of the prime agricultural land that is being destroyed.
- Infrastructure is not effectively provided – a monetary contribution has been offered to one of the schools, but there are no additional jobs, the health centre is overburdened, the roads cannot cope with more people having to commute on and off the Island as there is insufficient local employment and reliable transport. There are now increasing numbers of delivery vans travelling to and from homes.
- What about the junction with the Billy Line? Pedestrians and cyclists will be negatively affected by the new road opening, there are often families and novice road users crossing at an already busy junction.
- Transport infrastructure has had a negative assessment from Hampshire Highways and the Traffic Team.
- The RSPB do not directly support this application. They have advised comprehensive mitigation strategies which would take at least 3 years to implement prior to any works being undertaken. The bat survey also made significant recommendations to mitigate the effects of any future developments.
- Hampshire County Council have deemed the flood risk information to be insufficient.
- Are there any air quality, noise assessment or pollution reports, especially during the commuting periods and summer holiday traffic peaks?

- The housing density and housing mix does not fit with the surrounding properties which are mainly detached bungalow or 2 story houses. The proposal is for a dense development with effectively 3 story properties and flats, which are not in keeping with the neighbourhood, which consist of mainly mature residents and with few, if any, young families.
- Many of the surrounding properties will be severely impacted by the density of the proposed development, mainly 2 properties per existing property boundary and the height of the proposed development is in excess of the surrounding bungalows.
- There has been a negative report about the potential for anti-social behaviour and associated policing risks which need to be addressed by the developer.

COVID-19 has changed many working practices and consequently there will be many office buildings left unused in the future, which would be much better suit as flats for younger working people. There is increased demand for family homes in rural or seaside areas, with parents much more likely to be able to work from home.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Elise Maynard', with a large, stylized flourish at the end.

Elise Maynard

Managing Partner

Elise Maynard and Associates LLP



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. Concentrating on just one development, with over 10,000 homes planned, plus windfall, it surely makes sense to consider the **cumulative** effects of all developments on infrastructure.

Further development in the borough is **contingent** on appropriate mitigation to combat excessive nitrate pollution but there are some serious oversights in the proposed mitigation arrangements and the Sinah Lane development. We have at least three mitigating nitrate pollution mechanisms which will cause more, not less contamination.

Circumventing nitrate neutrality regulations with a truly “**experimental**” credit scheme with unproven scientific credentials is complete madness! The outcome of this experiment will not be known for many decades. We could unwittingly be creating an unsustainable and damaging legacy for future generations that simply cannot be undone!

Budds Farm serves 410,000 toilet users that generate 3.3 million litres of human waste suspended in 109 million litres of household wastewater every single day. In dry conditions this wastewater gets fully treated. However, in wet conditions human waste is mixed with rainwater and dumped from multiple harbour outfalls. The Sinah Lane foul water arrangements will unequivocally lead to increased human waste concentrations at Budds Farm as runoff is separated and dealt with by SUDs.

Deep in the subsoil are the “locked-in” remnants of fertilizers from historic farming. In order to support the proposed geese refuges’, mono-cropping will be required; it’s acknowledged additional nitrate-based fertilizers will be required for this mono-crop. Tide-locking (ie elevation of the water table by high tide) will force up historic nitrates which will spill into the SUDs combining with mono-crop fertilizer nitrates which will ultimately permeate the harbour; there is no mention of the understanding of these nitrate pollution mechanisms in the documentation pack – why is that? The SUDs arrangements are at best precarious especially during heavy rainfall and high tides.

Chichester Harbour’s water quality has been significantly improved since the installation of Ultraviolet disinfection at Apuldram. Budds Farm is not installing ultraviolet disinfection – why is that?

The Ricardo report (1) makes authoritative statements about nitrates relating to Chichester Harbour and yet the same report has failed to demonstrate how (and where) nitrogen concentrations are being measured here. Quite a contrast with the Langstone Harbour case, here, there is considerably more detail outlining sampling locations and a plethora of complex statistical data analysis and charts. Where is all the complex scientific data tracking and analysis for Chichester Harbour? It is, afterall, the site of the Warblington Farm nitrate credit scheme at the heart of HBC’s development ambition.

Surely there is a requirement to have both harbours similarly instrumented in order to demonstrate the effectiveness of the nitrate credit scheme? Monitoring the

effectiveness of all proposed nitrate mitigations for this harbour and other sites is vitally important, underpinning the whole point of the neutrality exercise. It is clear that Chichester Harbour and adjacent waters are not being closely monitored otherwise the (comprehensive) report would have referenced the data?

This is clearly a significant problem, so there is considerable doubt cast about...

1. Who defined the nitrate neutrally monitoring process specification and what success looks like?
2. Who is responsible for executing/managing/monitoring/analysis?
3. Who is funding the monitoring process?
4. Why is 1-3 above not documented? It forms the basis of scientific scrutiny.

Specific mitigations for the Sinah site are the use of SUDs for surface drainage, sending only foul water to Budds Farm and the provision of mono-cropping for geese refuges. All three mitigations are likely to increase nitrate into the harbour. It is essential that the monitoring process is in place and working ASAP in order to adequately record the current nitrate status before the efficacy of subsequent mitigation can be determined.

The HBC's Nutrient review (2) clearly agrees with much of my assertion, it casts doubt on Budds Farm to help reduce nutrient loading as

1. "it has the potential to increase the nutrient loading on sensitive habitats within Langstone Harbour and habitats"
2. "there is insufficient evidence to conclude with certainty that new housing development in the Budds Farm catchment will not cause a deterioration in condition or hinder the improvement in condition of the designated sites"

ALL of the mechanisms I highlight will be significantly exacerbated by climate change within the development's 100-year.

The Sinah Lane development nitrate mitigation needs more work!

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References:

1. Ricardo: Nutrient Neutral Development review 2020 June FINAL.pdf Para 4.1.2
2. Ricardo: Nutrient Neutral Development review 2020 June FINAL.pdf Executive Summary



**For DMC 29<sup>th</sup> October 2020.**  
**Planning Application 18/00724. 195 homes to be built on land north**  
**of Sinah Lane, Hayling Island.**  
**Deputation on behalf of Havant Friends of the Earth and Havant**  
**Climate Alliance.**

**This application should not receive planning permission on the following environmental grounds:**

**1. Reduction of foraging for Brent Geese and Waders**

This development will increase the incremental loss of SPA supporting sites on Hayling Island and across the Solent. This site provides winter foraging at high tide, adjacent to Langstone Harbour. The proposal to turn the land to the north of site into a nature reserve managed by the RSPB is desirable if the development goes ahead, but will not adequately compensate. We do not think that Bird Aware can provide adequate recreational mitigation for building on or beside land previously used by birds. The encroachment of habitation in itself will be a deterrent for many birds, even if local residents have been educated about them.

**2. Water Quality/Nutrient Neutrality**

By Natural England methodology, this development will result in a nutrient reduction, improving water quality, although we would like physical evidence, of the nutrient levels in the field. The WYG assessment has not factored in the RSPB proposal to apply 50 – 70 kg fertiliser (per hectare or field?) to the nature reserve in autumn, nor the impact of grazing animals if used (how many?)

Any reduction of nutrients leaching from the land, must be considered against the increase in sewage going to Budds Farm which will result in more frequent storm water discharges which will be detrimental to water quality. Natural England methodology does not cover this. We remain concerned that the development will reduce water quality overall and damage our seagrass beds, which are vital in combatting climate change.

**3. Loss of productive farm land**

The agricultural land on this site is classified as grade 3a which falls within the category of “Best and Most Versatile” for agriculture. Land of this quality is very limited in the UK, so this site should remain in production, especially in relation to Brexit and the need for food security.

**If the development is given permission, the following conditions should apply:**

**4. Trees and hedges**

We need increasing tree cover to support carbon reduction and biodiversity. Species rich planting of hedges and trees, including some larger native trees, are needed along the northern edge of the site to increase screening for the nature reserve, as well as within the site and around the western and southern boundaries.

New plantings need a management plan to care for them. Homes should not be placed too close to trees causing pressure to prune. The number of homes should be reduced to allow for this.

#### 5. Biodiversity

Trees and hedgerows, with native wildflower and vegetation underplanting, are also needed to provide wildlife corridors around and through the site. Fences should have ground level holes to allow small mammals such as hedgehogs, to travel through. A variety of bird nesting boxes are needed, as well as bat boxes, attached to houses or large trees. The aim is for a net gain in biodiversity.

#### 6. Brent Geese and Waders

The site is already attractive to the birds and well used. The proposed nature reserve to be used in mitigation needs to be prepared and ready for the birds before work on house building starts. Noisy building work should be avoided between October and March.

#### 7. Building for a low carbon future

Some of Barratt Homes "fabric first" approach is good, i.e. better insulation, and waste water heat recovery, but it will only partially meet the Council's emerging policy E12 Low Carbon Design. Barratt will install condensing gas boilers although these will be banned from new build homes from 2025. Solar pv with appropriate positioning of buildings, or heat pumps should be installed.

#### 8. Encouraging cycling

It is positive that all properties will have cycle stores as well as bin stores. It is important that these are secure and have sufficient space to store 3 to 4 bikes. If there is to be only one access point onto the Hayling Billy Trail, it should be at the northern end of the site, so that cyclists are not deterred by having to go "a long way round" to reach it. The developer should make a contribution to improvement of the Trail surface.

#### 9. EV charging points

Only houses with garages have these. They should be available by all parking spaces to encourage transfer to electric vehicles.

Patricia Brooks

## **Rosie Law: Deputation DMC 29th October 2020 APP/18/00724**

### **Brent Geese**

A major issue with this application is the protection of Brent Geese and Waders.

This 12.4ha of land is designated as a Primary Support Site, yet only 5.7ha of land will be kept as an onsite refuge.

To mitigate completely for land lost to this development, and also the Oysters, another larger proposed refuge at E26 (now IN1K) needs to run alongside.

It is stated in the Officers Report (Item 3) that E26 is adjacent to the onsite refuge. This is not the case.

E26 is separated from this site by a Salt Marsh causing fragmentation in the Brent Geese network.

E26 itself, lies within Flood Zone 3, and just like the North West boundary of this development, is already being rapidly degraded by coastal erosion.

The Hayling Billy Trail was even to be moved inland to avoid this erosion.

What this means in practice, is that the land that is set aside to mitigate land lost for development, is already decreasing in size – something that will be further exacerbated by the effects of climate change.

It is therefore not sustainable now and certainly not for the lifetime of the development.

Furthermore, the proposed refuges need to actually be proven to work prior to development. As seen in the Officer's Report, there is still no clear evidence of an obligatory binding agreement for the future management of these refuges.

*"Page 15, Public Reports Pack 29102020 AKA. The Officer's Report"*

Currently, crop rotation is used on this land which reduces the amount of fertiliser and pesticides required. Changing the land-use to a bird refuge will require mono cropping and increased use of fertiliser and pesticides. The structure of the soil will also deteriorate, making nutrient runoff into Langstone Harbour much worse.

### **Drainage**

The Flood Risk Assessment (FRA), only published in March this year, raises many alarming issues.

Not only does it confirm Southern Water has rejected any future involvement in the SuDS, it also shows that Langstone Harbour will now be the final destination of water drained from this site - 2 key revelations that really do cast doubt on the sustainability of this proposed drainage system.

It should be noted that instead of Langstone Harbour, the FRA states 'Sinah Lake'. This should not be confused with the 'Sinah Lake' south of the site, the FRA is referring to a lesser known channel that's wholly within Langstone Harbour!

Underground fresh water is proven to lie very close to the surface of this site, as close as 45cm below ground level in some areas.

The site has a less permeable clay layer just below the surface which currently separates surface water from the groundwater. This layer will be compromised by the development.

The clay layer will be punctured by man-made structures, such as housing foundations, which go deeper than 1m, creating a link between the groundwater and surface water.

Once the clay layer is compromised, attempting to drain this surface water, by pumping, will also result in pumping up an endless supply of groundwater beneath the field that also rises and falls with the tide.

This calls into question the feasibility of this drainage technique for this site.

Continual pumping, disturbance and extraction of groundwater from beneath a clay layer is a known cause of subsidence. This will result in a serious issue with not only this development but also existing houses.

Currently, the site floods with a vast volume of surface water, particularly in winter months. Once the proposed attenuation pond reaches capacity, something very likely in winter, the SuDS will need to move water offsite at the same rate and volume generated by precipitation (winter storms etc.).

The rate and volume of this overflow will overwhelm any filtration system, so overflow leaving the site will contain decades of farming fertiliser along with pollutants and nutrients from households and building processes.

It is absolutely unacceptable that not only will this contaminated water be purposely directed into offsite habitats such as the Saltmarsh and ancient natural ponds, but will end up draining out into Langstone Harbour.

This is similar to what happens to Southern Water's raw sewage after heavy rainfall in what some describe as a 'licensed discharge', others would describe this as a reasonably foreseeable failure of planning and insufficient infrastructure capacity - certainly not a starting point for development.

This proposal is clearly not a sustainable development. The drainage plan represents a threat to the surrounding offsite environment, including the adjacent dwellings, and the mitigation for ecology and the transport network will not prevent a severe impact from this development.

**Site Address:** Land at Sinah Lane, Hayling Island

**Proposal:** Erection of 195No. dwellings, associated open space, pumping station, sub-station and formation of new vehicular access off Sinah Lane. Change of use of land from agricultural to a Wader and Brent Geese Refuge Area

I wish to submit this written deputation concerning the proposed development.

While I support the need for further housing to meet the general increase in population. I object to this development on the grounds that the Hayling Island infrastructure is not robust enough to sustain such a development without detriment to the existing Hayling Island population. Which includes the lack of employment for an increased population on the Island, resulting in increase traffic flow on the one and only road accessing Hayling Island. This will increase the existing congestion particularly during summer periods.

The Island is also experiencing a loss of services such as Banking, Difficulty in obtaining Doctor services, No NHS dental services, reduction in Pharmacy services, shortage of school places.

These will all lead for the need to travel off the Island which adds to road traffic congestion and pollution.

Until the infrastructure needs of the Island are met, further development should be suspended so the needs of all the residences of Hayling Island are not further diminished.

Roy Leach MBA C.Eng CIBSE

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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