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## **Update report re APP/20/01031 – 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 (Resubmission of APP/18/00724)**

## **5 Statutory and Non Statutory Consultations**

### **HBC Ecologist- further comments**

Thank you for consulting me on this application. Thank you for your patience. In formulating my comments I have also considered recent correspondence regarding the presence of SPA bird species and cropping operations within part of the application site.

I have reviewed the various submitted ecological reports, including the Habitats Regulations Assessment, Ecological Mitigation and Management Plan, Biodiversity Action Plan and the Winter Bird Mitigation Strategy (all WYG, November 2020). I have previously commented on the general ecological conditions at the site as detailed within several species-specific documents – I note that these have been updated and I am satisfied that the general ecological value of the site is understood and remains the same as previously. Being predominantly an arable field, the site is generally unremarkable in terms of ecological value, with the chief interest being its use by bird species associated with the nearby SPA/Ramsar. The woodland and hedgerows at the eastern edge of the application site are also of ecological importance and this is acknowledged.

The ecological mitigation, compensation and enhancement measures for the development site are acceptable. Trees and hedgerow habitat at the site boundaries will be largely retained intact and protected during construction. New landscaping includes areas of native scrub and hedgerow as well as areas of wildflower grassland. The proposed SuDS basin and swales will be able to provide a valuable wetland element and some wetland plantings are proposed. In terms of protected and notable species the proposed mix of avoidance measures (e.g. timing or certain works, protection of retained features, no use of night-time lighting etc.), new habitat plantings and features such as bat and bird boxes are acceptable. The inclusion of nest boxes for common swifts is welcome, as is the use of ten bat roosting boxes. The success of retained and new habitat areas for nocturnal species such as bats will be largely dependent on the strategy for artificial lighting. Details of lighting can be secured by condition, and the strategy must ensure that retained and new habitats are not subject to levels of lighting that would deter bats.

As previously discussed, one of the principles of the published mitigation guidance for impacts to SPA supporting habitat (as defined by the Solent Waders & Brent Goose Strategy) is that impacts to Core or Primary SWBGS sites would be deemed acceptable if an alternative site can be found that fulfils at least the same function to the same population of birds. This approach has been adopted within the context of

the requirement for new dwellings as set out in the upcoming Havant Local Plan 2036 (but also across the wider Solent region) and as a direct response to the continued unmitigated loss of SWBGS sites over many years. In practice, this requirement for mitigation/compensation places considerable difficulties for proposers in terms of finding an alternative compensatory area that is of sufficient size and condition to provide the same function to birds. For Core or Primary sites, compensatory areas must be large and close by the site being lost, and suitable options are few.

One of the inherent traits of the SWBGS network is that there is no mechanism for ensuring the presence of suitable habitat, even where a site is important for birds, as most sites are in private ownership and used for agricultural purposes. There is no guarantee that even the most well-used and important Core and Primary sites will be placed in suitable cropping/management in any one year. Therefore, a guiding principle of the latest SWBGS is securing areas of permanent habitat, managed solely for the birds. The loss of part of a large/important SWBGS site that may only be in suitable condition every few years is deemed acceptable if a comparable area (in size or function) of permanent habitat can be secured in its stead. This is the situation at this application site: a permanently-available grassland site with scrapes and secure fencing, managed by a suitable organisation, is a better site for birds than an arable field which may only be suitable every few years. Whilst there have been bird records throughout the entire site over many years, the survey data submitted both for the Oysters development and the current application have indicated that the northernmost section of the field has been used most consistently by the greatest number of birds. Many factors are likely to influence the birds' use of a site: cropping, disturbance, proximity to housing, sight lines will all play a role. Records in recent years (for the SWBGS and development-related surveys) show that the northern area is used most often and has supported not only brent geese but wader species also. The lack of records in the central and southern areas (i.e. the application site) in recent years is likely explained by the lack of suitable habitat e.g. bare plough during winter 2016/17. This again highlights the reliance on suitable cropping to make each site suitable for birds. The evidence of very recent records of brent geese within the central and southern sections is not surprising – if habitat is available the birds will use it. Birds may use a site for feeding e.g. if there is a suitable crop such as winter cereals or just for resting e.g. if regular sites are unavailable.

The relationship with the permitted Oysters development has been discussed before. The mitigation for that development was supposed to include secure fencing along the eastern boundary of the Sinah Lane H34C site (to prevent informal access across H34C) as well as management of a small area of pasture to the north. There was no condition relating to the ongoing management of land within H34C and management was therefore subject to usual cropping as determined by the landowner in response to commercial necessity. There were clearly implementation issues with the secure fencing, which is highly regrettable. I understood that this had been addressed although it would seem from recent correspondence from a local resident that there are still issues with unauthorised access into the site: this needs addressing urgently and certainly the security of fencing must be enforced in future. It is hoped that the

addition of new hedging as a result of the current proposal will further secure this boundary, alongside properly secure fencing.

The main mitigation measure – the permanent bird refuge site – is accepted and I understand that the RSPB are essentially satisfied that all matters are resolved in terms of ownership and ongoing management. Confirmation of this will be required before the LPA can determine that the mitigation is deliverable. On the basis of the submitted information I am satisfied that the refuge will be suitable compensatory habitat and accords with the mitigation guidelines as set out within the SWBGS.

In terms of construction-phase impacts, there is clearly potential for noise and visual disturbance of wintering bird species. The HRA includes outline details relating to the avoidance of construction works within the wintering bird season. This is unlikely to be practicable and therefore alternative measures such as acoustic fencing and noise reduction and monitoring are highly likely to be necessary, especially as construction moves into the northernmost sections adjacent to the refuge. A fully detailed Construction Environment Management Plan (CEMP) can be secured by condition.

If you are minded to grant permission can I suggest that all ecological mitigation, compensation and enhancement measures are secured by condition.

*Development shall proceed in accordance with the ecological mitigation, compensation and enhancement measures detailed within the Ecological Mitigation and Management Plan, Biodiversity Action Plan and Winter Bird Mitigation Strategy (all WYG, November 2020). Ecological enhancement features shall be installed as per ecologists instructions and retained in perpetuity in a location and condition suited to their intended function. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

In addition, I would recommend that a CEMP and Lighting Plan are secured by condition.

*Prior to the commencement of development activities a Construction Environment Management Plan (CEMP) shall be submitted to and agreed in writing by the Local Planning Authority. This CEMP shall include (but not be restricted to): specifications for construction timing and logistics; pollution prevention measures; measures to control surface water run-off and the emission of dust and noise; and specific measures to avoid or mitigate damage and disturbance to species and habitats. The CEMP should clearly detail the roles and responsibilities associated with the protection of the natural environment during construction, and mechanisms for monitoring and reporting. Reason: to protect biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

*Prior to the commencement of development activities a Lighting Plan shall be submitted to and agreed in writing by the Local Planning Authority. This plan shall include lighting contour modelling and lighting specifications and shall be in accordance with the outline recommendations detailed within the Ecological Mitigation and Management Plan (WYG, November 2020). Reason: to protect*

*biodiversity in accordance with the Conservation Regulations 2017, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.*

**Responses to requests from the Site Viewing Working Party for additional information to be provided to the Development Management Committee:**

Responses

*(1) Footpath access to the refuge.*

The proposed formal links to the Billy Trail from the application site would provide access to the southern and northern ends of the proposed residential development. At the northern end of the proposed residential development an access gate is proposed to provide vehicles access to the Bird Refuge (for authorised entry only) and to connect with the informal footpath that crosses the field and connects with the informal footpath that lies adjacent the coast to the west. The Winter Bird Mitigation and Strategy and Plan provide for this and an enlarged extract from the Plan will be included in the PowerPoint presentation at committee.

*(2) Oysters Mitigation*

As part of the mitigation for the Oysters housing development, as set out in the HBC Ecologists response, the mitigation for that development was supposed to include secure fencing along the eastern boundary of the Sinah Lane H34C site (to prevent informal access across H34C) as well as management of a small area of pasture to the north. There have been issues with damage to the fence to gain entry. The provision of a formal connection from the Billy Trail to the application site, together with replacement fencing and proposed hedging on the eastern boundary of the refuge (as set out in the Winter Bird Mitigation and Strategy and Plan), would provide a more robust boundary treatment to the Bird Refuge and education Boards would supplement this.

*(3) Clarification on E26*

The reference to this area adjoining the proposed Bird Refuge is incorrect and as shown on the presentation to the Site Briefing on the 4 March 2021 it lies further to the north. It lies in flood zone 3.

In addition to the above responses, a further update will be provided in respect to the Transport Contribution and the fencing and monitoring of the Bird Refuge



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**Planning Committee 10<sup>th</sup> March 2021**  
**Application/20/01093**  
**195 homes to be built on land north of Sinah Lane.**

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 seagrass beds, which are vital in combatting climate change.

3. Loss of productive farm land

This is “Best and Most Versatile” agricultural land, which 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.

The landscape plan does not go far enough. More 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. We need increasing tree cover to support carbon reduction and biodiversity. The proposed long term management plan will be essential for new planting. Although some homes have been “moved” to place them further from trees, this does not appear to be far enough to prevent pressure to prune or cut down trees. To enable this the number of homes on the site needs to be reduced.

#### 5. Biodiversity

There is reference to green corridors through the site but more could be done to enhance biodiversity. Not just a wildflower meadow is needed, but more habitat plantings with native trees, hedgerows, and vegetation underplanting, are required 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. Recommendations for bird and bat boxes should be followed, as well as reptile refuges. Lighting should comply with Bat Conservation Trust Guidance.

#### 6. Brent Geese and Waders

The site is already attractive to the birds and well used. A CEMP needs to be in place and followed. 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. These are homes which will need retrofitting in future. Solar pv with appropriate positioning of buildings, or heat pumps should be installed.

#### 8. Encouraging cycling

It is positive that all properties will have sheds to provide cycle stores, if they do not have garages. 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.

#### 9. EV charging points

It is not acceptable that only houses with garages have these. They should be available by all parking spaces to encourage transfer to electric vehicles.

Patricia Brooks

## Deputation Submitted by Ms Hawdon

Re: **Site Address:** Land at Sinah Lane, Hayling Island  
**Case No:** APP/20/01093

This proposed development of 195 homes should not go forward for a number of reasons including:

All construction and development must consider the impact on climate change.

- The island ecosystem is fragile and is already showing signs of overload.
- The infrastructure on Hayling is already insufficient.
- It would change the sense of place, an important part to any community.

Construction and buildings are an important source of carbon into the atmosphere at approximately 40% overall. That's just the buildings themselves and unless they are built with strict environmental impact mitigation measures it is difficult to change this. Building on a greenfield site also increases carbon because of the loss of plants that absorb carbon. The plant life includes seagrass a major carbon absorber.

Islands are inherently fragile due to lack of space and sea encroachment. These houses will only increase the stormwater run off that will increase as storms increase from climate change. If you go to the building site after a big rain you will find a good portion of it submerged in stormwater. A good portion of this is absorbed into the farm soil, with some running off. If the site is built on the runoff presents a major issue that is only partially answered with the presented plan as any pond or water storage will quickly be overwhelmed and be released to the harbour, carrying pollutants that affect plant and animal life.

Currently there are some important communities of various plants and animals that are protected in that area and any development will have a negative impact. The best know of these are the geese and seagrass. Hayling used to have large beds of seagrass, but in the past twenty years pollution in run off and over-use have decimated the beds. Research has shown seagrass to be better at absorbing CO<sub>2</sub> than forests. Paving over these habitats will only have a detrimental effect on these communities and increase loss of species.

The infrastructure of Hayling ie. The roads, medical facilities, and sewage treatment are already insufficient and adding this number of homes will cause failures that would have long term effects. Southern Water will continue to destroy the harbour water because they cannot deal with the increased sewage. This sewage turns an area that is well known for its beauty and watersports to just a massive sewage tank, making it unsafe for kayakers, sailors, surfers, swimmers, fishermen. Insufficient facilities such as over-crowded roads and bad medical care will cause people to leave, decreasing the value of people's homes and creating a less desirable community.

The sense of place is important to community and Hayling is well-known for its beauty, walking trails, and a small town feel as well as the beaches. This housing

project would destroy that face and turn Hayling into a bedroom community for Portsmouth and Southampton. This increases the traffic on an off the island which presents another problem.

If you build on this greenfield site you make only one group of people happy—the people making money off the building.

## **Deputation Submitted by Mr Lowe**

As a resident of West Hayling I wish to register the objections of myself and wife (Dr. Graham Lowe and Mrs Jacqueline Lowe of [REDACTED]).

This resubmission, under the cover of a change of use to include a Wader and Brent Geese Refuge Area, is a grotesque use of environmental concerns for commercial gain. As a Zoologist I have observed that the Waders and Brent Geese use the fields of West Hayling quite happily without the need to designate the area. The addition of 195 houses is certainly not going to add to their over wintering and feeding experience. Such a development will add considerably to congestion on the roads and all this extra traffic has to go over one single carriageway bridge! The average number of cars per household in Hampshire is 1.4, so that's close to an additional 300 vehicles all coming up and down West Lane and Station Road.

I further major concern is why is the council even considering placing more households on low lying land? Approval of this application would send the signal that the council is out of touch and doesn't really understand the risks that global warming is predicted to bring in our and our children's lifetimes. With all the predictions of sea level rises and increasing frequency and magnitude of storm surges, why is the council even allowing consideration of placing more families in harms way? We'd prefer to see the council creating plans to protect coastal areas before thinking of locating more residents only a few metres above high tide.

Yours faithfully

Graham Lowe

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**Deputation Rosie Law – Independent Hayling Resident (South West Hayling)**  
**Planning Committee Meeting 10<sup>th</sup> March 2021**  
**For APP/20/01093**

This application looks the same but there are significant differences highlighting environmental importance and potentially serious risks to existing and new residents.

The groundwater bulge under this site continues to raise questions. Despite Barratt Homes' engineer's report, this continually replenished underground fresh water lies as close as 45cm below the surface (FRA Nov 2020), but rises and falls by 10cm in amplitude with the tide despite being 800 yards from the harbour. We have seen this in our rear garden's soakaway even in summer.

The Lead Local Flood Authority (LLFA) is concerned and raised new conditions:

- avoiding groundwater mixing with surface water in the attenuation pond
- preventing obstruction of drainage flow from existing gardens northwards onto the site

Only 2 of the 6 bore-holes for 2016-17 groundwater survey data have been working and the results of the replacement bore-holes, this winter, are being chased by LLFA to ascertain accurate groundwater levels.

The forecasted rise in tidal height is 1.4m in 100 year lifetime; the groundwater levels will rise proportionately.

SuDS calculations on flow rate and volume relate to surface water but the rising level of groundwater over the development's life-time should be in this modelling.

The successful Primary Support Site includes mitigation for the Oysters and covers 12.4 hectares, yet only 5.7 hectares replace it as an onsite refuge.

Natural England have stated more land is needed to mitigate for the land lost to both this and the Oysters developments which **MUST be adjacent to the onsite refuge preventing further fragmentation of the SPA.**

HBC's proposed mitigation land, 'The Hayling Island Bird Refuge' (E26 ), **is NOT adjacent** to but separated by the Salt Marsh and east of the Billy Trail. Currently farmland under the same ownership as the site, it undergoes crop rotation including winter wheat - favoured by Brent Geese. Whilst very similar to the existing Primary Support Site, it is **completely within flood zone 3 and suffering rapid coastal erosion** like the North West boundary of the onsite refuge.

The County Ecologist has agreed the Brent Geese will forage wherever winter wheat is grown. Mono-cropped grassland with new landscaping and nearby estate will not attract the Brent Geese compared to open fields with winter wheat. **Therefore this mitigation is unsustainable and also leads to failure for the onsite refuge.**

Barratt Homes have appeared to undermine the course of this application:

- Continued lack of adherence to The Oysters S106 Condition to maintain fencing along the Billy Trail to prevent disturbance and attract Brent Geese remains an enforcement issue.

- Barratt Homes plan for waste water at 110 litres per person/day is nearly 60% less than average for this area. Southern Water explains 265 litres pp/day passes through Budds Farm including 3% sewage. This unrealistic target distorts calculations for nutrient neutrality, mains and waste water new provision and will affect infrastructure in the area.

The binding agreement for the future management of these proposed refuges is still not finalised. The RSPB is disappointed with Barratt Homes 'inconsistencies' in their Biodiversity Report:

- Sums of money to create and manage this new habitat, as advised by County Ecology, have not been correctly reported
- Barratt Homes' wrongfully included additional numbers in their biodiversity calculations over claiming net gain

In 2018 the planting regime on H34C was altered manipulating Brent Geese sightings. As a result the southern half became wasteland just when data was needed to ascertain whether the Brent Geese were grazing on the Southern half of the field where the housing is proposed. Fortunately, new crop planting this winter included part of the southern half of the field as well as the northern section and attracted hundreds of Brent Geese to forage where the housing is proposed. The RSPB and County Ecologist have officially received this new information but Barratt Homes' report remains out of date.

Natural England very recently produced a Condition Review demonstrating serious damage to local ecology in our surrounding single body of water, Langstone and Chichester Harbours. Just using money to fulfil conditions will NOT address these serious environmental problems.

**This development risks building homes on a future tidal marsh and destroying a successful Primary Support Site.**

**Its viability depends on unresolved mitigation issues for traffic and sewage infrastructure and environmental sustainability and endless obligatory conditions requiring enforcement. Agreeing Planning permission in order to fulfil a 5 year housing supply and receive money for such mitigation is unethical not demonstrating balanced consideration for irreversible damage caused by this proposal.**

Rosie Law  
8<sup>th</sup> March 2021



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# ELISE MAYNARD

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Associates LLP

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

8<sup>th</sup> March 2021

**Ref: APP/20/10903 Erection of 195 No. dwellings, associated open space, pumping station, sub-station and formation of new vehicular access off Sinah Lane.**

Dear Planning Services,

COVID-19 has changed working practices and consequently there will be many town centre office buildings left unused, which would be much better suited as accommodation for working people. There is brand-new accommodation within a few hundred meters of the proposed development, which has been unoccupied since well before any of the lockdowns and more underway in the local area. There are very few local amenities such as restaurants or pubs, no cinema, bowling or similar leisure facilities and the buses stop early in the evening. The health centre is over-burdened, taking weeks to get a routine appointment. The transport infrastructure is inadequate and even a minor event can cause grid-lock on and off the access bridge to the Island.

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 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 which is putting even more pressure on the roads.
- The development is very close to the junction with the Billy Line - this is a very busy pedestrian and cycling route used by 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
- There are NO 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/retired 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.

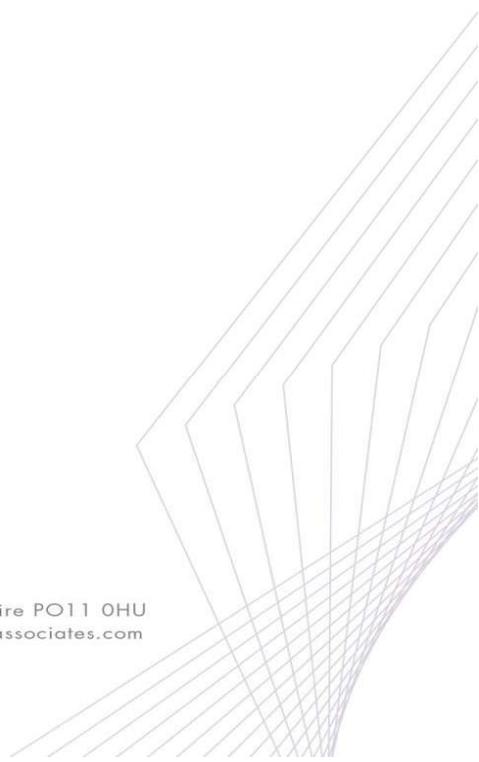
Yours Sincerely

[Redacted Signature]

Elise Maynard

Managing Partner

Elise Maynard and Associates LLP



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## **Deputations Submitted by Mr Parham**

The HI Transport Assessment (TA) was commissioned in recognition of the unique infrastructure limits fixed by the capacity of the A3023/Bridge single access route, and recognised the need to evaluate the road network as a single strategic requirement. The A3023/Bridge is accepted by HBC as having no economic options to increase its capacity, therefore why has the most logical and essential criteria been ignored: the loading vs capacity of the only access route?

The only independent review of the TA (undertaken by an internationally recognised expert on Roads, Professor Nick Hounsell) recommended the route be assessed with a flow/capacity analysis as the correct way to evaluate the impact of the Borough's housing development on the Island's roads. The data to undertake this analysis is readily available: why has this professional advice been unacknowledged and disregarded?

The peak hour loading at the bridge is approximately 85%, with many periods when the road becomes overloaded and gridlocked, leaving little spare capacity to absorb the increase from HBC's ambitious housing and tourism growth plans. A clear picture of the flow/capacity over time to ensure a sustainable infrastructure is essential in any development evaluations.

The TA includes a number of mitigation projects to improve the round-the-Island traffic flows as essential network enhancements supporting the Plan. The costs are estimated at £10,500,000 – these can only increase.

There is only a £600,000 contribution in this application and incidentally, nothing from the numerous windfall developments in progress to provide finances the essential strategic improvements which are supposed to be implemented ahead of the need.

Your Committee should require a detailed funding analysis as part of the evaluation process for all housing developments, including this one.

Our second area of concern is coastal protection and the condition of the surrounding waters.

Coastal Partners' Hayling Island Coastal Strategy is scheduled for completion in 2022, so no one knows what the future looks like, but options will include contraction of the coastline. It is significant to note that the shoreline adjacent to the Sinah Lane site is classified as 'no intervention,' and threatened by the 1.4mtr tide rise prediction. Coastal Partners declined to comment on this application, and deferred to the Statutory Bodies.

The water quality surrounding the Island is rapidly becoming a national scandal. Serious complaints requiring Southern Water (SW) to re-evaluate its processes and utilities to stop polluting our beaches and harbours have been raised by Alan Mak MP, Chichester Council, Natural England, Harbour Authorities, Chichester Harbour

Trust, Harbour Sailing Clubs, Hayling Sewage Watch, and local support groups. HBC is notably absent from the list.

The pollution is primarily generated by discharges of excess screened but untreated waste water from the SW sewage network. These occur when the network capacity is reached through rainfall and system failures. Some of these discharges are licensed, some not. In the 11 months February to December 2020, just for Langstone Harbour, there were 160 discharge events over 75 days lasting a total of 1,215 hours. We can assume a similar situation exists in Chichester Harbour.

This means that on at least 75 days last year, the blue flag bathing beaches of Wittering, Hayling and Southsea were likely to be contaminated.

The SW 5year service improvement plan is not designed to stop waste water discharges.

Alan Mak is supporting a Bill which would require SW to stop polluting our two inland waterways. SW have stated that to stop the pollution would require a change in the Law and a massive investment, which is not going to happen overnight.

Therefore, as it stands, housing development and climate change will inevitably exacerbate the situation and increase pollution, resulting in an unsustainable eco-structure.

SW have stated that the discharges of waste water are contained within the harbours. This is untrue and must be retracted. Our two harbours fill and empty twice a day, and the outflows impact the designated bathing waters.

The minimum requirement should be for SW to provide this Committee with a detailed improvement project schedule, together with the pollution impact at each stage so that it can accurately inform the development's infrastructure needs.

The nitrate reduction claims for this site and Warblington Farm are purely aspirational. Where is the process to ensure compliance?

It is the cumulative development which should be driving the infrastructure design and expansion. Continuing with the housing plan (including this application) without a proven pollution control process, an accurate TA, and coastal strategy in place we stand the risk of blindly establishing an unsustainable environment and making irreversible mistakes.

Dave Parham, Save Our Island Group  
8 March 2021

## Deputation Submitted by Mr Platt

HAVANT BOROUGH COUNCIL Town & Country Planning Act 1990  
**Waste water Deputation** on Planning Application APP/20/01093

The waste water sewerage is currently pumped from Hayling Island via the main pumping station at Stoke. It is sealed system and has no screening or pressure release until it gets to Buddsfarm treatment plant. Thankfully Southern Water are currently pouring resources into Stoke to modernise control systems and improve resilience to electrical power failure and replacing the two worn out, unreliable, main long shaft pumps but there is no plan for input screening or the possibility of increasing the pumping station's output capacity.

There is clear evidence that sewage manhole 0801 encasement at Stoke has ruptured and others poured raw sewage directly into Langstone twice in the last 6 months because the infrastructure cannot cope with the current input of the existing pumps in the south of the Island. Also the sewage load is steadily increasing through those pumps because HBC's reluctance to stop windfall housing development. This proposed enormous Sinah housing development (APP/20/01093) must be stopped from adding yet another high performance input pump to this increasingly fragile sealed system.

The only responsible HBC solution to avoid catastrophic sewage system failure is to insist that Barrats cost and agree to pay for, the installation of a new link off the Island to screen and pump sewage direct to Budds Farm and not via Stoke.

Richard Platt  
[REDACTED] Resident  
7 March 2021



## 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>

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## Deputation Submitted by Ms Rawlinson

To whom it may concern

As a resident of Hayling Island I would like to object to the proposed building of 195 homes in Sinah Lane for various reasons.

Even before the pandemic, our Doctor surgery's have been extremely oversubscribed, meaning it can be two to three weeks before we can obtain a routine appointment with our Doctor. This includes blood test appointments and general well-being, appointments which are vital with certain conditions and illnesses. This is on top of urgent appointments. We have a very high population of retired and elderly on the island who need to be taken care of. This makes it even harder for those of us who work full time and rely on the goodwill of our employers to allow us time off, to enable our health to be monitored.

Our schools are also very overstretched. More children need extra support (especially at this time) which can not be provided now, so adding to the numbers will put a strain on resources even more.

Leaving the island to attend appointments at local hospitals is a very fraught experience, as any manner of obstacles can cause delays: food/parcel delivery's, dustmen, broken down vehicles, large lorries unable to take the bends and cyclists, to name a few. This means leaving ridiculously early to ensure you make the appointment on time. Ambulances attending incidents have an awful time, as constant congestion hampers their ability to get through. As we have many visitors to the island, the tailbacks on and off can be right back to the beach, even up to midnight on occasions. How can residents leave and return to their homes with this amount of traffic? We can't! Adding to the volume will not help.

Most houses these days have two cars, meaning nearly 400 extra cars will be making journeys everyday. As it has been pointed out by other concerned residents, there is no employment on the island, so most will be travelling to work and back off island. The schools and Doctors are not close to this site, leading to more car travel. The pavements through West Town are non existent in places, as the village was designed not to be heavily residential. Therefore unsafe for children to walk or cross.

We recently had a burst water pipe on Sinah Lane. This caused disruption to traffic, pedestrians and left homes with low water pressure whilst it was fixed. It was due to the movement of pipes caused by sediment moving under groundwater pressure. Surely this should be taken into account? Adding more homes on a known flood plain will not help.

Over the last few months we have noticed a huge rise in the amount of wildlife in the field where the proposed build will be. This ranges from honey buzzards, bats and a peregrine falcon. We have now and over the years had slow worms, newts and stag beetles and have a friendly hedgehog family who come in through the fence from the field, into our garden. Many birds frequent this site.

Visitors to the island use Sinah Lane as a means of getting to the ferry area to launch boats and jet skis. Their cars are frequently parked on yellow lines to avoid car park fees, making it difficult for residents to leave their driveways or to walk safely.

Some of the proposed houses are three story's high (windows in the roof) making them taller then existing houses. They face directly into residents homes on the second and third floor making people feel very vulnerable and exposed. Our gardens will be totally overlooked. We have worked hard for our properties and should be able to feel safe and comfortable. Why should we lose our privacy?

We all take pride in our homes and need to feel safe, especially at this current time. Should we not have a private space we can feel secure in?

Kind regards

Davina Rawlinson

{Address redacted}

## Deputation Submitted by Ms Skennerton

### Objection to HBC Planning Committee Approving APP/20/01093

Please note: all page numbers refer to the Public Pack Agenda Document for Planning Committee  
10/03/2021

Reference to Barratts' Nutrient Assessment is November 2020 1440156 Appendix B

This new Application generated 578 new residents' objections detailing crucial local circumstances that the NPPF (p.6) requires you to heed. Local residents know that groundwater sits 18" below the surface: can this site be sustainably drained (p.3-4) with its fundamental issues of surface PLUS groundwater build-up? Neighbouring gardens flood after heavy rain, requiring electric pumps to clear. Surface water run-off from 195 homes and their associated hard-standing will exacerbate existing residents' problems. Are you sure that Sinah's new residents will fully understand their responsibility for these, as they are committed to pay a Management Company whose costs & competence are inevitably uncertain? P.26 makes clear the vital importance of the SuDs coping. There is still no agreement regarding the management of the surface water part of the SuDs. It is planned to overflow from the attenuation 'pond' into existing and old overland drainage ditches. These are regularly blocked and stagnant, needing frequent maintenance yet run through different land ownerships. This discharge flows through an ancient woodland pond next to the highly sensitive habitat of the Salt Marsh and into the already environmentally damaged Langstone Harbour. Langstone Harbour Board (p.23) objects to this urban development and its inevitably damaging effects.

Residents live with the reality of single failures from Hayling's 15 sewage pumping stations – 16 with Sinah's proposed station - spilling raw sewage into pathways, roads & people's gardens annually. Southern Water hasn't stopped these failures. Additionally Hayling's sub-surface land shifts, causing pipe fractures below ground. In 2021 Portsmouth Water mains pipes alongside the site on Sinah Lane & Park Road broke twice, stopping drinking water to those roads and those at least half a mile away.

Can you guarantee such infrastructure will be sustainable for the next 80-100 years for Sinah field's 195 homes, possibly 450 inhabitants?

Local residents know the danger of walking the Station Road's narrowing footpath. Try walking its length with a small child or pushchair, let alone allowing school-children to walk there. West Town is a popular, busy shopping locality throughout the week – Tesco's opens 0600. Have you tried crossing Station Rd. between Staunton & Manor Roads of a weekday morning? It's dangerous and the road traffic caused by 195 new homes will create rat-runs up residential 'escape' routes like Staunton. Parents report near 'misses' with teenage cyclists, earphones on, exiting Barratts' Oysters development onto Station Rd's 'race track'. The popular builders' merchants - a fencing company on its opposite side - help the squeeze on Station Road's route into West Town's shops & then there's West Lane, chosen by motorists for its quick route down to the Havant Road. Please also think about the school years' low morning sunshine's effect on drivers.

Proposals for children to walk or cycle to the nearest schools – Mill Rythe's, Mengham's, Hayling College – are fanciful. Whichever route children choose must cross Station, Beach or Manor, possibly St. Mary's, then Church Roads. Every single one of these is extremely busy first thing mornings, and afternoons. Ever-increasing tradesmen and deliveries exacerbate this situation. St. Mary's lacks footpaths, its on road parking causes motorists to speed.

Local parents strongly object to using West Park as a 'safe' school route. There is ongoing evidence of drug use, small gangs who harass youngsters. Early morning & afternoon walks to school will be on well screened footpaths – school children would be vulnerable.

Crime concerns for the Sinah site (p.14) highlight the conflict between lighting its worrying crime vulnerabilities & adversely affecting nearby residences. They add the dangers inherent in the Billy Trail, its rural ambiance hiding it from open view, so flashers, attacks on dogs, lone individuals have become more common. Would you let your children walk/bike to school on that route? The Sinah Application is designed to include families yet refers to distances from schools, retail & facilities as 'walking distance'. Only local knowledge can possibly convey to you that Hayling's central roads plus West Town's are, even now, incredibly busy. Sinah families will resort to driving their children: so what about air quality, pollution?

On those points: only 14.9% of the Application homes will have charging points; Environmental Health (p.17) questioned why there are not Solar Panels to mitigate against the inevitable transport emissions.

Barratts' Nutrient Assessment p.7 uses 110L/person/day but Budds Farm calculates 265L/person/day wastewater production. Yet new UK homes must meet 125L/person/day. Barratts' Assessment is unsustainable, failing the "perpetuity" test (p.80).

With so many serious outstanding issues, please listen to residents and refuse this Application.

Anne Skennerton

## Deputation Submitted by Mr Stewart

Dear Councillors,

I strongly object to this application - one of the Hayling Islanders who voted 578 to one against it. I wish to highlight an issue which I am concerned will lead to serious accidents.

Station Road, which extends east from Sinah Lane, is the sole and shortest direct route for pedestrians, cyclists, vehicular traffic, including disabled mobility buggies, going from the proposed Barratt development to the shops and schools at West Town/Mengham - and to get off the island.

It has a severe pinch point where the road is only about 4.8m wide - so narrow in fact that buses and large trucks, which go in both directions, have to stop to let even small cars pass. The footpath on one side of the road is precisely 45cm wide and on the other narrows down at one point to about 65cm. On the northern side (the same side as the development entrance) there is no footpath at all for stretches up to about 40m.

The photo below illustrates the issues - it was taken looking west on Station Road towards the development, halfway between it and West Town. A pedestrian, a medium sized van, a car, narrow road and footpaths - an accident waiting to happen? Imagine a group of school children "messaging about" on the footpath! Imagine the increased danger when 500 new residents arrive and 300+ cars, plus all the heavy construction vehicles over the reported 5 year build period.

And yet if you read Barratt's description of this scene in their Travel Plan, you will see absolutely nothing about this section of the road. Instead, in a blatant misrepresentation, they show photos of and write about the 1.8m wide footpaths with grass verges of Sinah Lane and Staunton Avenue which, apart from about 40 metres of Sinah Lane before it joins Station Road, are simply not relevant.

Plus they write about an enhanced footpath and pedestrian crossing on Station Road which they say resulted from their Oysters development. However the fact is that the "enhanced" footpath is 65cm wide at one point and there is no pedestrian crossing! This all begs the question - what other misrepresentations have not been critiqued and/or corrected by HBC staff or the consultee, the Highways Authority (HA)?

I have had recent correspondence with the HA - these are direct statements I received:

- "It is acknowledged that there are sections of the footpath into West Town which are below minimum widths."
- "... the existing restrictions on Station Road are not ideal, we are constrained by the highway boundary limits."

In addition there were comments which strongly indicated that the HA, with Barratt's consultants and HBC staff involvement, have not done a proper investigation of the

local situation. An alternative to using Station Road as the direct and shortest pedestrian route, is being proposed especially for school children, through Hayling Park. The applicant will contribute £35,000 for “wayfinding” enhancements. However, this is absolutely not a solution. The “way” is already well known by kids but is seldom used because it is longer; it bypasses the shops at West Town where kids gather after school; the park has been frequented by gangs and druggies; in the winter months when it is dark and the park is empty, can anyone really expect kids to walk on this route, especially if they are alone.

But the HA does not see this as a problem because, to quote, “these schoolchildren are of an age which means they are likely to be accompanied to the Mengham schools by a parent”. This shows that the HA is not even aware that there is a school catering for 11-16 year olds - who don't want parental supervision. Parents from the Sinah Road area do not walk their infant kids to school - they drive them, it's too far and too dangerous.

The disturbing thing about this lack of research and understanding of the local scene is that the “solution” is supported by HBC planners who are recommending “Grant Permission” after the consultee HA, and they are not alone, has been somewhat lacking.

Councillors, the “below minimum limits” and “not ideal” Station Road will not be fit for purpose. The consequences of proceeding with this application are clear and obvious. You are being asked to make decisions based on incomplete information. This project should be put on hold until a detailed and independent review is carried out of the Station Road problem.

Yours,  
Ray Stewart



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# PLANNING COMMITTEE 10 MARCH 2021

## DEPUTATION ON APPLICATION APP/20/01093 FOR THE APPLICANT

Speaker 1: Jon Gateley – Barratt

Dear Councillors

Firstly, thanks to the officer for her thorough report.

You'll recall that in October committee endorsed our first application, which now sits with the Planning Inspectorate due to the circumstances we faced last Spring. We have agreed with officers to 'pause' the appeal pending this committee for this second application, which is virtually identical. Our hope is for a council-level approval, after which we'll withdraw the appeal.

I'll cover the main planning matters before handing to our engineer to cover drainage.

**Firstly, principle.** This site is chosen as site H29 in the Local Plan, being sustainable and accessible. Our scheme goes hand-in-hand with the policy, and meets its aims. This includes, especially, the environment. About half the site will permanently go to the RSPB as Winter Bird Mitigation, along with £326,000 of funding, and we expect to sign the legal agreement very shortly. The development creates Biodiversity Net Gain, and unusually for Havant, is Nitrate Negative. All this means there is no objection from Natural England or County Ecologist. Combined with other measures on energy efficiency, electric charging and landscaping, the development is sustainable.

**Secondly there are major social and economic benefits.** Investment on the Island at this scale is rare, and the boost is all the more important in today's climate. We will contribute about £1.7 million in Infrastructure Levy, £872,000 to education, with further sizeable contributions to Health, a community worker, and the Billy Trail. Combined, these will provide a real boost to the Island.

**Thirdly transport.** We realise highway conditions are difficult, but following much hard work between County, Havant and ourselves, we have agreed a package including £700,000 of highway and walking contributions for the Island.

**Fourth, it is urgent to provide this housing.** As the report says, there's an acute need for Havant to bring forward deliverable sites because supply has slipped far below where it needs to be. But this is not about arithmetic, it is about real people's lives, when the need to have space to live has been proven more than ever. Through this development, Barratt will provide 58 homes in affordable tenures. This is one of the biggest single contributions in the Island's history, and 137 further households will benefit from property ownership.

So I commend this scheme and would invite Committee to reach the same conclusion as it did in October, in line with officer's recommendation and the council's Local Plan.

Speaker 2: Terry Seymour, RCP civil engineers

We appreciate residents' concerns and share the goal of achieving development free of flood risk. But we must stress many of the objections stem from misunderstandings.

Firstly flood risk. The Environment Agency's Maps confirm the site lies wholly within Zone 1, i.e. **low** risk of flooding from the sea and rivers. Our Flood Risk Assessment has assessed the risk of flooding from other sources including groundwater and surface water, and finds the risk to the development is **low**. It also confirms that risk elsewhere does **not increase**. The Environment Agency and the Lead Local Flood Authority (HCC) have reviewed our assessments carefully and raise **no objection**, subject to standard conditions. These conclusions are also true of tidal influence, which geotechnical engineers have assessed following extensive groundwater testing and measurements.

Regarding surface water, I can clarify that the main below ground surface water network will drain to the northern part of the site, from which it will be pumped into an attenuation basin beside the Winter Bird Mitigation Area, from a pumping station to be adopted by Southern Water. This basin provides temporary storage for peak storm events, and releases surface water to an existing watercourse at greenfield runoff rate. To ensure required capacity during rainfall events, the basin is above shallow groundwater, and is **not** compromised by tides. We have prepared 'Exceedance Flow Layouts' showing that even with pump failure, there would be no flood risk to properties. There is also emergency storage within the surface water network, to allow time for engineers to undertake repairs in that scenario.

Finally regarding foul water, the main below-ground foul water network will drain northward, from where it will be pumped into the existing public Southern Water foul sewer, to the north west. The onsite foul water pumping station and main below-ground foul sewers will be adopted by Southern Water.

Overall the drainage proposals are appropriate, sustainable, and sound, meeting with the requirement of the expert authorities.

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

Written Deputation for the Planning Committee

10<sup>th</sup> March 2021

Application APP/20/01093- 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 more widely and 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 Planning Committee.

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 is it only the fear of the implications of the 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 500 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 undone. We need housing but at what cost?

With so little land in the borough it is even more important that we approve the right plan in the right place and that mitigation measures are delivered before development.

**Transport**

Whilst it is not the local plan on trial, the Hayling Island Transport Assessment Addendum informs this application. The TA is just that an assessment, there are no firm decisions it is an assessment of the situation, It 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 its 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 he or she would be able to look at the island as a whole and either review or re enforce 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".***

Many 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. The recommendation does not require mitigation to be required before occupation.

The recommendations ask for just under **£700,000** to be paid to the Highway Authority for future projects.

You can find in **The Hayling Island Transport Addendum**

Summary : Proposed interventions on page 14, 15 & 16

<https://cdn.havant.gov.uk/public/documents/Hayling%20TA%20Addendum%20final%201-01%20incl%20App%20A,D,E.PDF>

At the site view meeting a member mentioned the potential changes to West Lane Junction for example, this is estimated at £1,840,000. 'Friction reduction' measures (north and south) £2,217,000. The Highways' contributions will not deliver these identified changes.

The principle of proposed mitigation and developer contributions just do not add up.

There is no evidence to support what any identified improvements may deliver. In the technical note issued on 15th March 2020 following the call in of the cabinet decision to publish 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 is required, who should pay 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 urge that you read again the highway conditions in the officer's recommendation which may help you understand why residents are so alarmed.

**Brent Geese & Wildlife**

Barratt homes recently developed another almost adjacent 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.

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. In recent years failures of this pumping station have led to raw sewage in peoples houses, gardens and Langstone Harbour. Problems are not limited to Stoke, lorries manually pumping sewage out of the sewers are 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.

Portsmouth Water have not been consulted despite two burst water mains in close proximity to the site in recent months.

## **Flooding**

The Flood Risk Assessment published in November 2020, 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 councils new Nitrate Neutrality off setting 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.

## **Safety and Walking to School**

Walking through West Town is hazardous due to very narrow pavements and lorries that deliver to the many businesses including builders' yard.

It is suggested that the appropriate route to school diverts children through Hayling Park. Both residents and common sense can inform us that this would be dangerous and unsustainable.

Widening pavements has been considered but moving telegraph poles means that this is not possible.

### **The previous application**

11<sup>th</sup> March 2021 is the closing date for submission of evidence for the appeal brought by Barratts for non-determination. The meeting to decide this application would have been held in the first weeks of lockdown and so quite reasonably the DMC could not go ahead.

### **Conclusion**

This application should be considered 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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## **Cllr Joanne Thomas – Ward Councillor Hayling West**

Written Deputation for the Planning Committee

10<sup>th</sup> March 2021

Application APP/20/01093- Land at Sinah Lane, Hayling Island

This application and its predecessor which is subject to an appeal is very complicated and it involves many hundreds of documents.

The applicant and officers have had to go to great lengths to attempt to prove the sustainability and suitability of this site and I believe with the benefit of local knowledge in addition to the report and the supporting documents it is the wrong application in the wrong place. With the recommendation to approve the application to turn this piece of farm land that is pretty much perched on the edge of Langstone Harbour in to a housing estate.

Why destroy a green field primary support site and create a new smaller one on site which is less likely to attract the Protected species when other fields are still planted with their favourite food? The site that Barratts now want to develop was not so long ago identified by them as an ideal site for these protected birds just a few years ago.

In 2018 & again in 2020 Langstone Harbour Board objected to the application in their statutory consultee response.

Natural England have stipulated Conditions regarding the adoption of Foul and Waste water drainage by Southern Water and have serious concerns Southern Waters' ability to address the quality and capacity of infrastructure needed to successfully adopt the sewage and waste water drainage for the 195 new dwellings. It is well reported that Southern Water are polluting our harbours and that their network fails regularly on Hayling Island.

Because of the complexity of the application, I wanted to highlight that the potential of damage to both Chichester and Langstone Harbours (which are joined so can be considered one body of water) is high. Excessive discharge of raw sewage mixed with surface water runoff into both harbours and the resulting eutrophication on the sea-grass is of great concern.

Data in Natural England's Condition Review of Chichester Harbour *sites: intertidal, subtidal and bird features (NERR090)* 23rd February 2021, reveals the extent of the damage to the Special Protection Area salt marsh habitats and eel grass. Langstone Harbour suffers the same issues. Natural England is very concerned about further planning for new developments, yet they can only advise Councils.

It is important to understand the difference between groundwater and surface water both of which fall under the remit of Hampshire County Council, the Lead Local Flood Authority, not the Environment Agency or Coastal Partners. The flooding which is of concern to local residents is the result of surface water from

the rainfall BUT ALSO the unseen but ever-present groundwater. Groundwater is defined as underground fresh water and is proven to lie very close to the surface of this site, just 45cm below ground level in some areas.

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

The claim that the water overflowing from the attenuation pond will be released at the same as current rates is interesting and bemusing to residents. Any directed flow will automatically be greater than it is now and the volume will under direction too. So, the rate at which water enters the Langstone Harbour must be different.

Once the proposed attenuation pond reaches capacity, something very likely in winter, the SuDS will need to move water off site at the same rate and volume generated by precipitation. In the event of filter failure or pump failure the whole Suds system could be overwhelmed. It is absolutely unacceptable that contaminated water could be purposely directed into off site 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 needs highly professional maintenance.

The mitigation for ecology and the transport network will not prevent a severe impact from this development.

Currently, the site floods with a vast volume of surface water from rainfall, particularly in the winter months. It sits on the field and only disperses by evaporation or slow seepage into the soil but this is limited as the soil is waterlogged and groundwater lies close to the surface so the water table is very high. There are drainage ditches however these require farmer intervention as these often blocked and clogged.

There is a proposed attenuation pond for the storage of surface water however, when this reaches capacity (something more likely in winter), the stored surface water will be directed to overflow offsite. This is likely to be at the at a much faster rate and volume after heavier rainfall, very much like the excessive discharges we have seen this winter into Langstone Harbour.

Filtration is part of the proposed mitigation but if it is overwhelmed, the overflow leaving the site will contain pollutants and nutrients from households and building processes. This means that the very nutrients we are trying to prevent will reach the harbour in much bigger quantities than now.

We know the rate and volume of this overflow has been calculated regarding the surface water but has the modelling taken into account the groundwater bulge trapped in the sediments under ground which will rise due to the forces created with more water in the harbour due to the predicted 1.4 m tidal rise.

If like me you find these details difficult to visualise you may be surprised that this application is informed NOT by an independent Hydrogeologist but by Barratts appointed engineer.

Surely, we should not allow relatively unproved drainage solutions to perch precariously close to a Special Protection Area where un filtered surface water could pass through the saltmarsh and reach Langstone Harbour. Even Southern Water with their record do not want to be involved in the surface water drainage.

Barratts have recently developed the Oysters near to the Sinah Lane site. The site of the current application was at time identified as mitigation for the Oysters. Natural England is clear that the land needed to mitigate land lost to development for these protected birds must not be fragmented and be of adequate size. The proposed solution is fragmented.

County Ecology have pressed that mitigation measures must be enforced; residents remain concerned following failures by Barratts (on the Oysters) site to uphold conditions that protect Solent Waders and Brent Geese from disturbance.

The RSPB appear to be increasingly concerned with Barratts biodiversity report and activity relating to this. There is no contract in place for management of the refuge.

This proposal is not a sustainable development. Any point of failure or extreme event could threaten the surrounding offsite environment, including the adjacent dwellings.

This site should not be looked at in isolation without linking to the wider mitigation issues eg infrastructure for traffic, drainage, infrastructure etc.

The officer report suggests that the Planning Balance including the issues of 5-year housing supply tilt the decision to be to permit but enough environmental and hydro-geological concerns remain to tilt the other way not meeting NPPF environmentally sustainable, economically or socially.

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