

Cllr Joanne Thomas – Ward Councillor Hayling West

Written Deputation for the Planning Committee

10th 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.