

COMMENT TO OBJECT – APP/20/01093

It is important for the residents of Hayling Island to know that we believe the Officers of Havant Borough Council are minded to recommend the resubmitted Barratt development proposal at Sinah Lane.

There are two main reasons why the close association between the developer and HBC should be subject to microscopic scrutiny.

The unique isolation and vulnerability of Hayling Island has been recognised, resulting in the agreement to evaluate all development against the strategic limitations and capacities of the infrastructure on the Island.

Treating each development proposal as a separate entity is a process which will end in a disastrous situation where the Island's infrastructure is overloaded without any opportunity for corrective action to repair the damage.

One more time it falls to the residents to point out the folly of this process and be the only responsible stakeholder to apply common sense to this situation.

1 The Road Infrastructure

The inept A3023 road infrastructure assessment produced by HBC in January 2019 has been totally discredited and recognised (even by the developer) as unsound. This would have been avoided if the Advisory Committee set up specifically for this purpose had not been excluded completely for the study and evaluation process. The revision is not scheduled until October 2019 so it is unacceptable that HBC are contemplating an engagement at this time.

We know in 2017 that the A3023 peak hour average is running at 82% of capacity (.82 c/v ratio.) The recognised max is 95% (.95 c/v ratio.) This data is from the permanent counter at the Ship Inn. This means that there is only 13% capacity left for all future developments and/or traffic growth forecasts before disaster ensues. It is important to recognise when that limit is reached, there is no way back.

Evaluating this proposal is an unacceptable risk for HBC to take when the HI infrastructure capacity is unknown, but it is known that this development will absorb over 20% of the available and previous headroom.

Why is this project rated as the highest priority?

2 Flood Risk Assessment

The first stage of the revised Environment Agency's Flood Risk assessment has now been published 2019 Flood Risk Management Long-Term Investment Scenarios Assessment and is now projecting an increase in the risks and costs associated with the probability that the 2^o temperature increase target to 2060 will be missed. This will result in an increase in the yearly investment from £750 million to over one billion pounds! And this assumes we all agree that the existing cost/investment ratio of 5:1 is acceptable. This means that for every £1 spent on sea defences, at least £5 must be saved on potential damage costs.

Significantly, the EA have now expanded the range of climate change scenarios. They now include a "plausible extreme scenario, high ++." In this scenario, a sea rise up to 70 cms by the 2060s is projected with the annual defence cost rising to £1.5-2 billion per year.

Coastal Partners have very belatedly recognised that a flood management strategy for Hayling is essential and a proposal to gain funding is in process. This is just the first stage in a long process and we should remember that any strategy developed does not mean flood protection – in some areas it may, but in others it may equally recommend flooding.

Havant Borough Council chose to disregard this situation completely in the Local Plan and just stated that it is not a concern because they have a flood early warning process and a post-flood emergency system documented – but untested.

So where are we now?

- There are no funds approved for any flood protection projects except the annual soft shingle shuffle on East Beach. (£3.5 million per year.) Funding for other projects will have to compete each year with the thousands of proposals from all the towns and villages at risk across the country.
- The West Beach flood defences are being sequentially demolished as HBC chose not to fund any maintenance. The Beach has now been eroded 35-40 metres north. The two golf courses and the CBK Kitesurfing Centre clearly did not qualify for investment.
- On this funding qualification ratio of 5:1 the only areas of Hayling which would normally qualify would be the beach east of the Inn on the Beach and the Eastoke peninsula. The rest of the Island's coast would not normally qualify. Also the previous flood risk map in 2017 showed 50% of the Island at risk in the projection up to 2115. This timescale is likely to get much shorter now.
- The EA report is clear in advising Planning Authorities to take into account the possibility of high flood risk areas overlapping and impacting developments which are adjacent and vulnerable. The potential for high risk flooding is now projected with the revised housing life cycle definition of 60 years (as documented in the latest NPPF document.) It seems to us the some of the proposed developments on Hayling are shining examples of this problem.
- It is important not to forget the impact that flood risk will have on the other key infrastructure systems – utilities, drainage and the A3023.

How can it make sense to build on a 'dry land island' on Hayling when the surrounding land is at high accumulative risk of flooding without any protection commitment?

It is easy to add other deficiencies relating to proposal details. Barratt's response to low carbon is always the lowest-cost solutions:

- Brick walls and ever-smaller windows (see the Oysters development) – no triple glazing – no solar or heat pumps
- Gas central heating is likely still being installed
- No recommended 30% mature tree coverage – twigs planted on a patch of grass do not comply
- A SuDS pond without recognition of the known mosquito problems on Hayling
- Use of a third party's surface water drainage ditches as the SuDS output without any maintenance accountability.
- The Government is proposing to ban diesel and petrol cars in 10 years' time. This creates two major issues for this development.
 - Insufficient provision for electric charging points for all users of electric vehicles.
 - If, as is likely, the provision for parking of work vehicles for self-employed residents is going to be severely restricted or prevented, where will vehicles be parked and how do they charge their vehicles?

It is wrong for the developer to expect, and for HBC to consider, any evaluation of the proposal before the HI Infrastructure Strategy has been formulated and agreed by the stakeholders. It is this agreed Infrastructure Strategy against which all proposals must be evaluated and managed.

Any further evaluation of the proposal must be delayed until the Infrastructure Strategy is in place.