

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/X1735/W/20/3253633

DETAILS OF THE CASE

Appeal Reference APP/X1735/W/20/3253633

Appeal By BARRATT HOMES

Site Address
Land north of Sinah Lane
Hayling Island
Hampshire
PO11 0HH
Grid Ref Easting: 470824
Grid Ref Northing: 99851

SENDER DETAILS

Name

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement

- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence
- ☐ Other

COMMENT DOCUMENTS

The documents listed below were uploaded with this form:

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10th March 2021

Milena Opolska

The Planning Inspectorate

Temple Quay house, 2 The Square

Bristol, BS1 6PN

Subject: Comments on Barratt Homes Planning Application for Development of 195 Dwellings and Wader and Brent Geese Refuge Area on Land North of Sinah Lane, Hayling Island.

References:

- A. APP/X1735/W/20/3253633 – Start Date 4 February 2021
- B. APP/18/00724 - Initial Submission dated July 2018
- C. APP/20/01093 – Re-submission of APP/18/00724 – Start Date 1 Dec 2020
- D. Pre Submission HBC Local Plan 2036 (Approved 30 Jan 2019)

1.Introduction

At Reference A, Barratt Homes elected to appeal to the Secretary of State about the subject development due to the failure of Havant Borough Council (HBC) to meet dates of approval on the Application at Reference B. Barratt Homes then submitted a further application to HBC at Reference C which updated their earlier application in 2018.

The comments below are primarily in response to Reference A which, we understand, is the latest amended version of Reference B by Barratt Homes. It should be noted that the original Application issued in July 2018 was heavily amended to counter and mitigate queries from local residents and consultees.

A separate paragraph is included to highlight the changes to environmental and infrastructure issues which have occurred during the last two years.

We strongly object to the above applications submitted by Barratt Homes for the reasons detailed below.

2. Hayling Island (HI) Infrastructure and Environment.

Hayling Island Access, Local Roads and Traffic.

Hayling Island has a single access from the mainland on the A3023 across a two-lane causeway bridging the Langstone/Chichester Harbours. Many of the roads on the island are narrow with speed restrictions varying between 30 and 40 MPH. During rush hours and weekends/holidays the main road is subjected to heavy traffic causing traffic jams with long delays on and off the Island. Ambulance and Police vehicles reacting to emergencies on the Island are often hindered by the volume of traffic on the congested roads, both when approaching and then when on the Island. Instances have been reported that helicopters have had to be scrambled as ambulances were unable to reach medical emergencies at the southern end of the Island.

This major problem was recognised and HI was included as part of the Havant Borough - wide Traffic Infrastructure Assessment with representatives from local government, specialist consultants and residents represented by an HI Working Group. The Traffic Assessment was a critical factor in the decision on the Barratt application by the HBC Planning Committee.

As the Traffic Assessment under the Local Plan was under review, it was requested that HBC Planning give a positive assurance that the subject application would not be considered until the Traffic Assessment was completed.

HI Landscape and Character. The Island currently has a balanced mix of farmland, residential, tourist/holiday sites and environmentally friendly areas for residents and visitors to enjoy. There is a continuing programme of “windfall”/in-fill developments on Hayling Island being approved by HBC Planning. However, any additional larger housing developments on the Island will have a detrimental impact on residents and visitors alike until major infrastructure issues have been fully resolved.

HI Environment. The island is fortunate to have a wide variety of flora and fauna. It is host to several species of migrating birds and nesting pairs, already protected in Langstone Harbour. The Hayling Billy Trail (HBT) with its surrounding woodland, hedges and fields harbours many birds, mammals and insects. The development at the southern end of the HBT will have an inevitable impact on the existing bird and animal life, especially the foraging of the visiting Brent Geese during the winter months.

HI Demographics. The Island has an ageing population of just under 17,000, older than the national average and also in the Borough of Havant, many being retirees. A large percentage of the dwellings are of a bungalow style apart from apartment blocks on the Seafront. Therefore, the design and number of the dwellings proposed by Barratts is completely out of character with the surrounding residences and meeting the needs of the local population.

Employment. Hayling Island has limited additional employment potential and, therefore, the working population on the development will have to commute off the island, mainly by car, creating more loading, congestion and air pollution on the A3023 during peak time periods. West Lane, already subject to fatal accidents, will become an obvious “rat-run” from Sinah Lane and create an even greater risk for commuters and leisure users.

Schools. Although the Secondary school and College allegedly have spare capacity, the Infant and Primary schools are nearing capacity and are forecast to be full by 2021. With the type of housing proposed, it is anticipated that many of the residents will be families including up to some 60 children of Infant/Primary School age. All of the educational facilities are some distance from the site and will necessitate transport by cars or bicycles along Sinah Lane and Station Road through West Town en-route to the schools. It is certainly the case that young pupils going the primary school will necessitate the use of cars for transport. In addition, it is reported that there are schoolchildren already commuting to schools off the island.

This will create further pressure from the only site entrance onto Sinah Lane which is already busy, with a narrowing on Station Road having a particularly dangerous “pinch point”. In places there are narrow pavements which cannot be widened due to the proximity of commercial and residential buildings.

Any further increase in “school runs” will only add to further pressure on the relevant side roads and the A3023.

Medical Services. There are two practices on the Island which are currently under pressure with waiting times to see a GP taking 3-4 weeks or longer and some patients are being diverted to Havant health facilities to reduce the load. This is not helped by an ageing population requiring additional medical support. The HI surgery is too far and unsafe for many elderly residents to walk or cycle from Sinah Lane to the Surgery and they will necessarily use cars. Also, any increase in population, estimated at 300-400 patients, would require extra facilities, parking and GP’s, the latter of which there is a known National shortage.

Utilities. It is presumed that the utilities to the site will be routed from Sinah Lane through the only access. The increase on existing facilities does not appear to be fully mitigated as the area already suffers from low water pressure and it is known that the sewage system is currently unable to cope during periods of heavy rain. There is no indication that the utilities infrastructure will be upgraded to meet the additional burden.

There are two current utilities issues on Hayling Island, namely sewage/wastewater management and water pressure which involve Southern Water and Portsmouth Water respectively.

- a. **Wastewater/Sewage.** Southern Water is responsible for the wastewater and sewage services on HI. There have been several instances of drains overflowing with raw sewage on public thoroughfares throughout the island. Also, the well publicised failure of pumps has caused major pollution problems into fields and ditches with raw sewage draining into Langstone and Chichester Harbours during periods of heavy rainfall.
- b. **Water Supply and Pressure.** Portsmouth Water are the suppliers of water on Hayling Island via a network of main 10”-15” cast iron pipes and arterial 4”-8” cast iron pipes. The majority of the pipes were laid in the late 1950’s /early 1960’s and are subject to leaks and bursts. The latter network of pipes supplies the south west corner of Hayling. Low water pressure continues to be a problem, certainly at the southern end of the island.

Despite Southern Water and Portsmouth Water's continuing assurances that current systems could cope with the additional loading on services from the development, these are serious on-going problems which would need to be fixed before any more development is approved.

Archaeology. Despite Roman remains being found at the northern end of the field in 1971, the Archaeological Assessment was a desk-based study and no active investigation had taken place. It is believed that an archaeological survey should be carried out on the site before any further action is taken on the application.

3. Pre-application Communications. Barratt's held public forums, supported by Havant Borough Council (HBC), in August, October and November 2017 when the proposal was for 160 dwellings in accordance with the HBC draft Local Plan. In a letter to Residents dated 18 June 2018, Barratts advised that an application would not be submitted until issuance of the HI Highways and Transport Infrastructure Assessment. Despite these assurances, the application at Reference B was submitted in July 2018 before issuance of these plans, with an increase in housing from 165 to 195 dwellings on the same site area. There was minimal communication by HBC to Hayling Island residents about the issuance of the application, many being away on holiday and unable to comment. Despite the late notice there were 500 plus public comments submitted against Reference B, all strongly objecting, apart from two supporting the application.

4. Issues Affecting The Proposed Sinah Lane Development & Refuge

Use of Agricultural Land. The proposed development is using Grade 2/3 agricultural land, described as "best and most versatile" according a statement in the draft Local Plan at Reference D. This land has been successfully farmed with rotating crops nearly every year. By building on the land rather than exploring "brown field" sites, it means a further loss of productive farmland on the island.

Existing Wildlife. It is likely that existing wildlife in the field and adjoining hedgerows will be detrimentally affected by any development during the building phases and after completion, especially as some of the properties abut the hedgerows along the Hayling Billy Trail.

Proposed Brent Geese Refuge. The area to the north of the development (H34C) is assigned by the developer for a SuDs and has also designated it as a Waders and Brent Geese Refuge. During late 2018, only the northern part of the field was sown with winter wheat and the area assigned for development was left fallow – this was a first that local residents can remember and would undoubtedly have skewed any recordings taken in this field during winter 2018/19. In the past, Brent Geese used to feed in this field in large numbers; however, there was a noticeable lack of feeding Brent Geese that winter, possibly due to use of "bangers" in the field in 2018 and the change in sight lines along the field. At the time there was concern that this much reduced size of the refuge to about 5.7ha. and the prospect of a development activities was unlikely to attract the return of Brent Geese to the field in future.

There will be construction activities for at least four winter seasons affecting the historical foraging habits in the field of visiting Brent Geese from November through to early March. This will be followed by noise, light pollution and disturbance from recreational activities from the estate once

developed. Also, it does not specify how agricultural equipment will access the field if it is turned to grass/grazing once building is completed. The only options available are either from Sinah Lane through the estate or along North Shore Road.

Flooding. The current Environment Agency flood maps show the field to be in a low risk flooding Zone 1 area. However, in reality the high level of ground water in the field and extensive surface water flooding are both subject to tidal locking especially during high tides and after heavy rainfall. As sea levels rise as forecast, there will be a further squeeze on the existing groundwater resulting in an even higher water table. By building on top of this "close to surface" water level, it could spread the already existing "bulge", further exacerbating the problem to neighbouring properties and potentially to residents occupying homes on the development.

- a. **Surface Water Management.** In the 2018/19 winter the south and north sections of the field were subject to marked areas of standing water after periods of heavy rainfall. Any surface water drainage system would drain into either the existing wastewater network or into Langstone Harbour. There is serious concern that Southern Water has underperformed on Hayling Island regarding wastewater and sewage management, indicating that the current system is already overloaded and not fit for purpose. The releases of waste water and sewage into Langstone Harbour are known to cause harmful pollution affecting the harbour environment and the "blue flag" status on nearby West Beach.
- b. **Coastal Flooding and Erosion.** At present there is no flood plan strategy for Hayling Island. In the Coastal Management scheme, the subject coastal strip along the field will not be a priority for allocation of funds to protect from flooding and erosion i.e. it is not sustainable for perpetuity. The predicted sea level rise of 0.83m, even with the effect of low pressure, spring tides and storm cluster over the next 50-100 years, will seriously affect the efficiency of the SuDS or other drainage methods. During the 2018/19 winter alone the western edge of H34C on the Langstone Harbour boundary, the field is affected by high Spring tides which eroded large chunks from the bank, up to a metre in places, and deposited seashore debris and seaweed into the field. The responsibility for defending the H34C field facing Langstone Harbour against flooding and erosion is currently with the land owner. This responsibility will transfer to a developer if planning was approved and thence to residents for future management in perpetuity, an issue not clearly addressed in this application.

Any housing development on the Sinah Lane site would exacerbate the above problems, with no guarantees of a lifetime management plan for the protection of this development and existing residences on Sinah Lane and North Shore Road.

Sinah Lane Traffic and Development Parking. It was requested that the Traffic Assessment should include traffic recording results at the west end of Sinah Lane. A traffic accident occurred opposite the Sinah Lane access, caused by poor visibility looking into low early morning sun. This highlights the potential dangers associated with vehicles exiting and accessing the site and traffic on Sinah Lane, especially in low sun "dazzling" conditions.

Transport and Parking in the New Development. The proposed development is densely populated with a 6 metre wide single entrance off Sinah Lane. Although Barratt has submitted a plan to demonstrate provision for "...varying sizes of vehicles... etc" it does not take into account the need for the parking of multiple emergency vehicles (fire/ambulance/police) in the event of a major emergency. Also, the entrance to the pump houses area is a cul de sac and there is insufficient room for large tankers to access in the event of sewage pump failure or spillage as evidenced recently in several sewage spillages and pump station failures on the Island. Weaknesses in their Parking Plan deems it to be not fully compliant with Reference D (para IN3).

Site Drainage & SuDS. Although the developer plans to include a Sustainable Drainage System (SuDS) with associated pump station for drainage, there is no indication for access to the pump by maintenance vehicles and as to who will be responsible for the essential long term upkeep of the SuDS lake and equipment. Also, there is every chance that the lake will attract mosquitoes which already exist in the pond in the wooded copse at the northern end of the field.

5. Key Issues Discussed Between Barratts and HBC Planning in 2019. On 11 September 2019, Barratt Homes wrote to the HBC Planning Departments appearing to counter many of the concerns expressed by Planning at their joint meeting on 7 August 2019. Examples of Barratt's dismissive attitude to Government and local HBC procedures to this particular development are summarised below:

Local Plan. Barratt Homes made an assumption that the draft Local Plan, although incomplete, has enough substance/content for their application to be considered in terms of "the amount, distribution and location of the development". In their letter they advised that HBC should take a balanced view in seeking to approve this sustainable development. This overbearing approach by the developer indicated that they expected HBC to make a premature decision without the full policy guidance available, including the HI Traffic Assessment.

Nationally-Described Space Standards (NDSS). Barratt Homes highlights "a number of significant drawbacks with the NDSS approach". By their own admission, they do not conform to some NDSS standards but state that the process is incomplete and not available for 9-12 months. Barratt intimates that HBC should disregard some standards under NDSS as they afford little weight to their application.

Balconies on Flats. Barratts completely disregarded HBC's request/requirement for balconies on this particular development with its rural views.

Low Carbon Design. Barratt, although fully agreeing with the principle of lower-carbon design, admit that their application "does not fully comply the precise aspiration under E12 (f)". Again, they use the excuse that the lack of formal low carbon policies is enough for HBC to agree to their application within current building/low carbon standards. The developer has not included the latest eco-friendly measures such as triple glazing, large windows for more light, solar panels etc. in this amended application, presumably on building cost grounds.

Electric Car Charging Points. Barratt advised that only homes with garages would be fitted with car charging points but the proposed design and layout of the site would enable additional points to be fitted post-occupation. This proposal would only cause unnecessary disruption/inconvenience to residents and should be included in development plans.

Provision of Allotments. Barratt agreed to discuss further the requirement for allotments with HBC. Any planning for allotments for residents would presumably be to the north of the development. This would impact on the already much reduced Wade and Brent Goose Refuge area and extend beyond the North Shore Road northern boundary line into the flood plain region.

Parking Provision. Barratt rejected the request by HBC for an additional 83 parking spaces on the grounds of the impact on their landscape and design. However, Local Policy IN3 was still under review and planning should not be agreed until such policy(ies) are agreed and published by HBC, the policy makers.

Landscaping. This was another example of Barratt not meeting the HBC requirements as specified by the Councils Landscape Team and potential customer expectations. Their Landscape Consultant is further reviewing alternative proposals and these would need to be reviewed and agreed by HBC before further action took place.

Housing Mix. Barratt advised HBC that their housing mix table was “incorrect in relation to what was being proposed”. However, the policy requires a range of dwelling types and sizes to meet local needs. Hayling Island has a large number of retirees and elderly people who require single storey bungalow style accommodation or houses with stairlifts etc. Also, the house designs are completely out of character with the local West Hayling area apart from more recent developments off Station Road. The Barratt housing mix should be completely revisited to meet local housing needs and not to benefit the developer’s commercial aspirations.

“Wellbeing”. To expect the local population to take to walking and cycling for “well-being” reasons, as proposed by Barratt Homes, is derisory as the A3023 is already extremely dangerous and the Hayling Billy Trail is subject to coastal erosion and heavy rainfall. Thus the A3023 and Billy Trail in their present configuration do not offer current and future residents safe and all weather cycling and pedestrian routes to the mainland. Only considerable investment would help alleviate the problems, but unlikely to be forthcoming from HBC, and certainly not covered by any CIL offerings from the developer.

6. Existing and Future Barratt Development Management and Management Plans.

The “Oysters” Development. The Oysters is a recent Barratts’ development to the north of Station Road nearby to the proposed Sinah Lane development. The Oysters is now under the management of the residents and the following issues have been raised during the subject period:

Mitigation. The issue of protecting the nearby habitat of wintering Brent Geese was not addressed by the developer until 4 years after the start of development, and then only minimal action has been

taken. This had not been followed up by the HBC Planning department during the period of development.

Management. According to Oysters residents, Barratt Homes was slow in the rectification of “snags” on the site for which they were responsible. For the proposed development the long term management and maintenance responsibilities need to be legally binding and clearly defined for issues such as utilities (water/sewage/electricity/gas), on-site maintenance, SuDS and swale maintenance, sites not formally adopted and refuge management before further consideration by HBC Planning. This is in accordance with the Local Plan at Reference D para IN5.

“Oysters” Resident Issues. Recent issues raised by current residents of the “Oysters” include:

Parking. There are no visitors parking slots on the site. Also, too few houses have garages and rely on side by side or tandem parking for 2 cars even though some households have 3 cars. This results in cars and vans being parked on the road and pavements, which could cause problems for delivery lorries or emergency vehicles accessing the site. Recent approaches about lack of parking by the Residents Management Committee to Barratt’s, the previous management company and HBC have met with “not our problem” responses.

Pavements. There is not paving all the way round the estate. In places it is either on one side or the other, with parts stopping to grass, then back to paving. This causes pedestrians, especially ones with family, to keep having to cross the road and is a potential safety hazard.

7. Additional Comments on Issues Raised Between the Issuance of Applications at References A & B and the Present Day.

The issues raised below are submitted bearing in mind the continuing constraints imposed by the Coronavirus epidemic which started to impact on the local area in mid-March 2020.

Ecology

Brent Geese and Waders. As a local resident close to the proposed development site, it is very obvious that the RSPB Consultation document is seriously flawed. The RSPB cannot have been made fully aware of the wintering and feeding habits of the Waders and Brent geese during winter months of 2018/19, 2019/20 and most recently 2020/21 with the change in crop planting in the site field. It is understood that the RSPB has been updated on this issue and it is recommended that both HBC and Barratt get a full briefing from the RSPB once they have reviewed the local resident’s input. Natural England has been appraised by a local resident of the possible breach of their 2013 Mitigation Strategy for the Protection of Dark Bellied Brent Geese on Hayling Island. It is understood that Natural England is reviewing the issue and HBC are requested to follow up with this Agency before any decision is made.

Wildlife – Flora and Fauna. During 2019/20 the farmer elected to leave 2/3rds of the southern end of “development” part of the field to remain unploughed. During the summer of 2020 this section was covered in wild flora which provided a haven for wildlife such as deer, hedgehogs, slow worms and frogs. It was also clear that the insect life increased as there were sightings of large numbers of

different species of bats foraging in the field as they transitted from north to south towards Sinah Lane and North Shore Road residences.

Environmental Health.

Groundwater. Sampling for contamination is an outstanding issue and should be addressed, especially as the field is subject to flooding after heavy rainfall and, to the north, from Langstone Harbour after tidal surges often affected by pollution from sewage. It is noted that winter level monitoring was carried out in 2016/17; however, photographic evidence shows considerable flooding in both the south and north parts of the field especially during the winter months from 2017/18 through to February 2020. Therefore, the Barratt winter level monitoring data is out of date. The results of the groundwater monitoring being carried out on the site from November 2020 to March 2021 are currently not available until the survey is completed. These results are critical as they will record the inevitable high ground water levels and extensive surface water flooding experienced in the site and refuge fields between December 2020 and February 2021.

Drainage/Sewage. After the recent sewage pump failures and spillages into Langstone Harbour and Chichester Harbour it is strongly urged that HBC looks very closely at the Barratt solution for pump failure using emergency ground storage. External specialist advice indicates that there is a need for at least a permanent pumping station and backup generator to support such a large housing development. It is recommended that HBC seek further professional advice on this critical environmental/health and safety issue which could impact on the Island's sewage/wastewater infrastructure.

Presumably Barratt has agreed in principle for the Local Sewage Authority to manage the system in perpetuity but the outcome is not known and should be pursued before any planning decision is made.

It is noted that Southern Water has not raised any objections to the application. However, it should be noted that they have lost credibility after their recent shocking performance on Hayling Island and other parts of the county. This is known by HBC and has been widely publicised in the local media. Despite their confidence, the ability for Southern Water to manage/cope with additional pressure on the infrastructure from this development for which they are responsible is highly questionable.

Water Supply. On 14/15 June 2019 there was a failure of the 15" trunk main water pipe onto HI. This had a huge impact on traffic on the Island as well as on the mainland stretching out on the roads to the west, north and east as much as 3 miles. Local residents on Sinah Lane and Park Road were subjected to loss of water from burst pipes on 21 December 2020 and 19 January 2021 respectively. This is another example of a fragile system not fit for purpose and definitely unable to support additional households unless updated/replaced.

Transport.

The HBC Traffic Assessment was debated at length and deemed to be flawed by some Councillors and as was also voiced by recognised outside agencies. However, it was still forced through by a marginally "legal" process and this questionable action removed one major hurdle for Barratt's towards achieving their goal to build 195 dwellings on the site off Sinah Lane. It is recognised that any additional local traffic of potentially 300-400 cars from the development will only exacerbate the

overload problem on the A3023. This could lead to “unsustainable” levels as defined by the National Planning Policy Framework (NPPF).

Flooding. The eastern edge of Langstone Harbour continues to suffer from tidal erosion and will not be subject to flood defences in the future. Over the years this will further reduce the size of the proposed Brent Geese refuge. Barratt Homes has provisioned the development with a pumping station and SuDS system. This is reliant on the already fragile foul water/sewage infrastructure as proven during the last two years with disastrous consequences for Hayling residents. Also, as the Southern Water authority has refused to accept responsibility for the surface water drainage part of the SuDS system, then any householders on the development will ultimately be responsible for the costs to maintain that part of the system and associated infrastructure. Although the development site is in Flood Zone 1, the northern and eastern border of the on-site refuge is adjacent to residences in Flood Zone 3 which would be affected by any overspill from the development. The leading local flood authority has already expressed concern about this high flood risk issue and it is evident that there is a lack of cohesive liaison between relevant water and flood agencies – surely a responsibility of the HBC. Thus, the proposed development goes against the revised Environment Agency’s Flood Risk Management LTIS 2019 document which states “in-appropriate development in an area of high risk of flooding should be avoided by directing development away from areas of highest risk”. These flood risks need to be fully investigated and co-ordinated between local and national agencies responsible before any planning decision is made.

Historical Environment. Comments by the County Archaeologist had previously advised that there was moderate archaeology for the Roman period and low to moderate for the later Prehistoric period. They sought a field evaluation before building consent and for no development until a programme of archaeological assessment was in place. There is no indication that this issue has been fully addressed by HBC or the developer. In addition, there have been recent finds of archaeological interest in the north of Hayling Island which have not been formally taken into account. It would appear that the requirements for assessments and field work report are still outstanding. Presumably HBC will insist on this being carried out before a planning decision is made.

Local Ecological Network. Although Barratt Homes has updated a mitigation proposal for Protected Species and the Solent Wader/Brent Geese Refuge, this has been generated by their chosen consultant; however, it contains unsupported assumptions and ignores the past failings of Barratt Homes to meet their mitigation commitments on a nearby recent development at the Oysters. Any survey carried out during winter 2018/19 will be flawed due to a change in crop rotation which resulted in Brent Geese not feeding on the proposed refuge area and large numbers moving to other fields north of the site for foraging. Any building activity during the period from November to March will necessarily disturb the foraging geese on the identified refuge which could be for as long as 4-5 years. Also, the development is being built on the “best and most versatile” agricultural land and, with the proximity to surrounding hedgerows, it will have an unquantifiable impact on the existing wildlife such as deer, badgers, birds, bats, snakes, lizards, hedgehogs and rabbits. In particular, large numbers of bats have been observed as using the field as a corridor to feeding areas at the southern end of the field near Sinah Lane. The initial bat survey carried out by the developer’s consultant is out of date, has not been reviewed recently and mitigation measures in the application are minimal. During the winter 2020/21, Brent geese were seen to be regularly foraging on the winter wheat in the sown field extending south of the designated refuge area.

Development Design. The density of the houses and their design are totally out of keeping with the rest of the dwellings in the local area. Although the houses meet very basic standards, there has been little recognition in the design of the buildings to meet future energy saving measures e.g. solar panels, water harvesting, adequate numbers of electric charging points etc. In the types of dwellings available there has not been any recognition of the demography of Hayling Island with a large retired and ageing population requiring single storey, bungalow style “lifetime” homes. The lack of adequate parking on the development has been raised by the HBC Traffic Team and this could only result in overspill parking on the already narrow roads outside the site such as Sinah Lane. This could potentially prove to be a hazard for emergency vehicles trying to gain access to the site and to local residences. These issues need to be addressed before any planning decision is made.

Public Responses to the Local Plan. The responses to the Local Plan have been forwarded to the Government authorities by HBC. Many of the issues and concerns raised above were also voiced in the responses to the Local Plan by Hayling Island residents.

HBC Advisory Planning Decision on APP/18/00724

On 29 October 2020 at an Advisory Development Management Committee Meeting (DMC), HBC Planning agreed to the Barratt Application at Reference B. This was despite the relevant objections raised by some local councillors and the many local residents. The decision seemed to be based on the grounds of the “financial “ benefits to HBC gained from ICL funding from the developer, little of which would be likely to benefit the many outstanding projects on Hayling Island.

Public Response to APP/20/01093

On 1 December 2020, the Planning Department gave only allowed 23 days notice for people to comment on the latest submission by Barratt Homes at Reference C, this being an on-going and important issue. Despite the short notice in the middle of a pandemic and the lead up to Christmas, there were over 570 **objections** and only one supporting public comment.

Recent Government Housing Policy. Recent pressure from local and national government bodies has forced HMG to reverse their “algorithm-based” housing policy from building on green-field sites to using “urban” locations for future development. Also, there has been mention in the media about the Ministry for Housing accepting that there is a problem with developers building on flood plains and recognised flooded areas.

Barratt Homes Legacy. Barratt Homes has run roughshod and been blatantly dismissive over many of the local and National current and emerging policies as shown earlier. It failed to meet mitigation and follow up processes on the “Oysters” development. It was less than honest in the early stages on the proposal when it reneged on the timing of the Application at Reference B. The design of their houses barely meet national standards, are certainly not in keeping with the majority of dwellings on Hayling and in no way meet the needs of the local ageing population. The developer has a track record for building developments on known flooded areas but refuses to take responsibility for their actions. The less than professional attitude of Barratt Homes should be taken into account and act as a warning to the Government and HBC Planning decision-makers.

7. Conclusion.

Although we understand the National requirement for more housing, we believe that the building of large developments anywhere on Hayling Island should be held in abeyance for the foreseeable future until the necessary longer term infrastructure plans are in place to cater for existing and future increases in traffic and population.

There are many factors in the Application at Reference A as highlighted above which remain unresolved and need addressing urgently before any decision can be made. The main issues are:

Infrastructure. The transport infrastructure on the Island is already at capacity and the additional loading of vehicles of 300-400 cars will be unsustainable without major works. The sewage and wastewater services are not fit for purpose, prone to breaking down, overflows and polluting of the Langstone and Chichester Harbours, needing significant investment before overloading with additional household waste. The water supply network is old, subject to bursts, leaks and low pressure and in need of updating, certainly in the south west corner of the Island.

Social Issues. The health facilities are already at full capacity with little room for expansion. The primary schools would need investment to expand premises and recruit additional staff.

Flooding. This is a key issue as the proposed site is already subject to high ground water levels and historic surface water flooding which, under the present SuDS plan, would still be a high risk to future site residents.

Ecology. The present area is a haven for a wide variety of wild life and an historic foraging ground for visiting Brent Geese during the winter months. The proposed development will inevitably impact on the local ecology, especially for the wintering Brent Geese.

Development Design. The design of the development is over-crowded and not in keeping with the majority of residences on Hayling. The design of the dwellings barely meets basic national building standards and do not include the latest eco-friendly measures.

Government and Local Policies and Guidelines. It is imperative that the developer, Barratt Homes, abides by the current and projected future policies before being allowed to build 195 dwellings on a site to which 570 plus Hayling Island residents have strongly objected.

We therefore cannot support the Application at Reference A as submitted to the Planning Inspectorate by Barratt Homes.

[REDACTED]

[REDACTED]

[REDACTED]

The Planning Inspectorate

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DETAILS OF THE CASE

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Site Address
Land north of Sinah Lane
Hayling Island
Hampshire
PO11 0HH
Grid Ref Easting: 470824
Grid Ref Northing: 99851

SENDER DETAILS

[REDACTED]

Address [REDACTED]

ABOUT YOUR COMMENTS

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- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

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YOUR COMMENTS ON THE CASE

It is vital that the infra structure on Hayling Island is improved considerably before any more development is allowed as currently lives have been put at risk due it's shortcomings. There must be another separate access, road and bridge, to the Island and the road system improved to take the vastly increased amount of traffic. According to the Environmental Agency, both the roads off the Island have to cross flood zones (flood zone 3) to get off the Island. As we have seen in the past with major road works, Hayling becomes inaccessible when only one of those roads is closed and allows no access for emergency services when needed. Recent developments have also failed to provide sufficient off road parking for the owner's vehicle, again fueling congestion problems with their associated risks to the public. Other services are also deteriorating. Water pressure is reduced and there are times when no water is able to reach the cold water tank in my because of demand and we are constantly experiencing water leakages and repairs (and disruption). The sewage system is also overloaded with Southern Water dumping large amounts of raw sewage into Langstone Harbour when weather conditions prevent the processing works from working as they used to. Before the recent onset of Covid-19, our health services were deteriorating with long delays to see a doctor and get vital medical support and this, of course, has become much worse over the last 18 months. Please suspend any further development that increases the population of Hayling Island until the much needed changes to the Island can me made.

The Planning Inspectorate

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Appeal Reference: APP/X1735/W/20/3253633

DETAILS OF THE CASE

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Appeal By BARRATT HOMES

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YOUR COMMENTS ON THE CASE

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

1. Reduction of foraging for Brent Geese and Waders

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

2. Water Quality/Nutrient Neutrality

By Natural England methodology, this development will result in a nutrient reduction, improving water quality, although we would like physical evidence, of the nutrient levels in the field. The WYG assessment has not factored in the RSPB proposal to apply 50 – 70 kg fertiliser (per hectare or field?) to the nature reserve in autumn, nor the impact of grazing animals if used (how many?). Any reduction of nutrients leaching from the land, must be considered against the increase in sewage going to Budds Farm which will result in more frequent storm water discharges which will be detrimental to water quality. Natural England methodology does not cover this. We remain concerned that the development will reduce water quality overall and damage our seagrass beds, which are vital in combatting climate change.

3. Loss of productive farm land

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

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

4. Trees and hedges

We need increasing tree cover to support carbon reduction and biodiversity. Species rich planting of hedges and trees, including some larger native trees, are needed along the northern edge of the site to increase screening for the nature reserve, as well as within the site and around the western and southern boundaries. New plantings need a management plan to care for them. Homes should not be placed too close to trees causing pressure to prune. The number of homes should be reduced to allow for this.

5. Biodiversity

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

6. Brent Geese and Waders

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

7. Building for a low carbon future

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

8. Encouraging cycling

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

9. EV charging points

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

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YOUR COMMENTS ON THE CASE

This proposed development of such a large number of new houses at Sinah Lane will overwhelm the site and the cause unacceptable and damaging strain on the infrastructure of Hayling Island, and be detrimental to the people who already live here. My concerns include drainage (this is a very wet site) because the development will exacerbate the serious flooding and sewage problems we already have in our community. It will cause the loss of valuable agricultural and amenity land, and essential wildlife habitat. It will worsen existing serious problems with traffic and transport. The only access road on to Hayling Island cannot cope with current levels of traffic and the addition of maybe 400 additional cars regularly using the road will be a disaster for existing and new residents. The road system cannot cope with existing levels of traffic as it is. There is often gridlock for hours if any incident at all happens or if there are roadworks. The current infrastructure especially medical services are already overloaded and often unable to give existing residents good service. Traffic problems makes access by emergency vehicles challenging. The strain of hundreds of new residents that this development would mean would greatly reduce the service to us all. I strongly urge that this appeal be refused, that planning permission is not granted and that the special nature of Hayling Island, its drainage and flooding issues, its limited infrastructure and unique traffic problems finally be recognised.

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THE PLANNING INSPECTORATE

TEMPLE QUAY HOUSE

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BS1 6PN

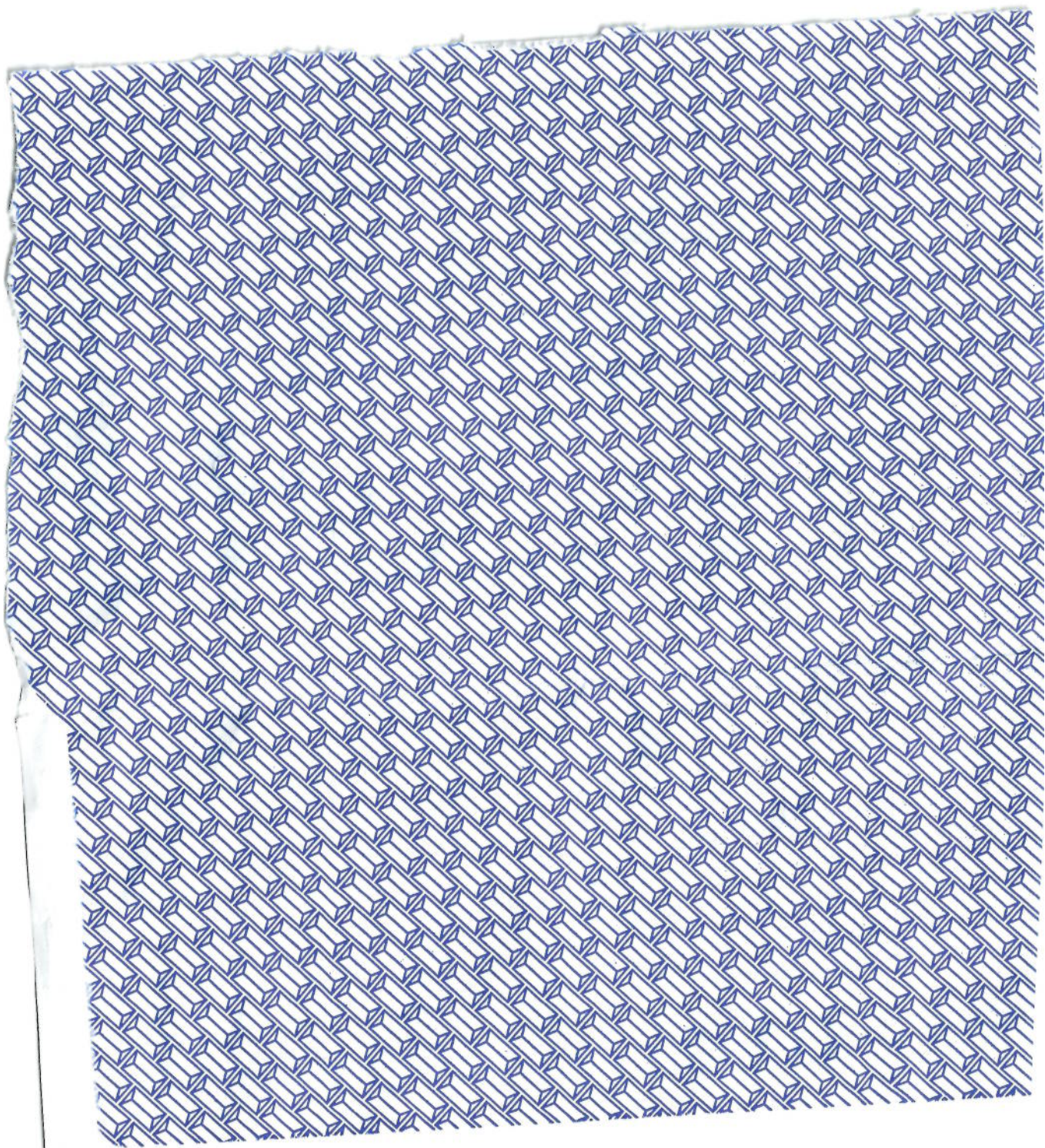
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REGISTRY
22 FEB 2021
RECEIVED

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The Planning Inspectorate

BS1 6PN

18/2/21

ATTN - Milena Opolska

Planning Appeal Reference - APP/X1735/W/3253633

Dear Madam,

I am writing in respect of the ongoing attempt by Barratt Homes to erect 195 dwellings , off Sinai Lane, Hayling Island.

This has been going on for far too long now and I have already submitted several objections to this plan, which I assume you have copies of. These objections are still relevant.

My latest comments are:-

The proposed site is currently water logged, as it is every winter, and I do not see any proposal to drain the site or protect the planned houses from flooding.

The edge of the site borders Langstone Harbour and the Billy Trail, this is gradually eroding away and there are no plans to provide any coastal protection for this sea border.

In addition the West Beach area of Hayling Island, just south of the proposed building site, is also eroding into the sea and the plan is to let the sea take over this area as there is no money allocated for this coastal area to be protected. So with 2 areas , close to the proposed site, quickly being eroded away it seems futile to build more houses in the vicinity.

SEWAGE - the increasing inefficiency of Southern Water failing to manage the sewage situation in the area should be a strong reason to limit new house building. There are frequent reports of waste water with sewage discharge being dumped into both Langstone and Chichester harbours. Southern Water have been fined for this activity but they continue to use this option after every heavy rainfall because their current plant cannot cope with the volume of sewage being generated in the area. They seem to have no forward plan in respect of building / increasing their waste treatment plants. Therefore I believe that ALL new building in this sensitive SSI area should be delayed until Southern Water provide a plan of how they can deal with current requirements , let only any future ones.

Yours sincerely

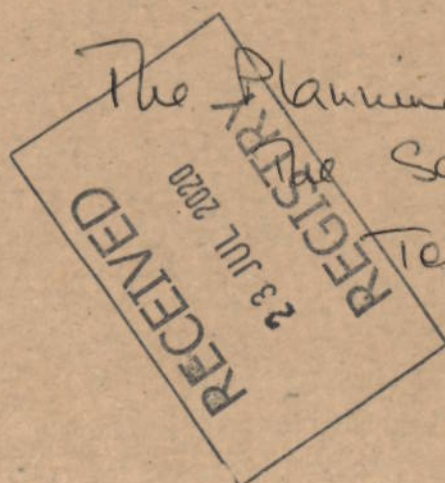
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RK-3253633

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Southampton Portsmouth & IOW



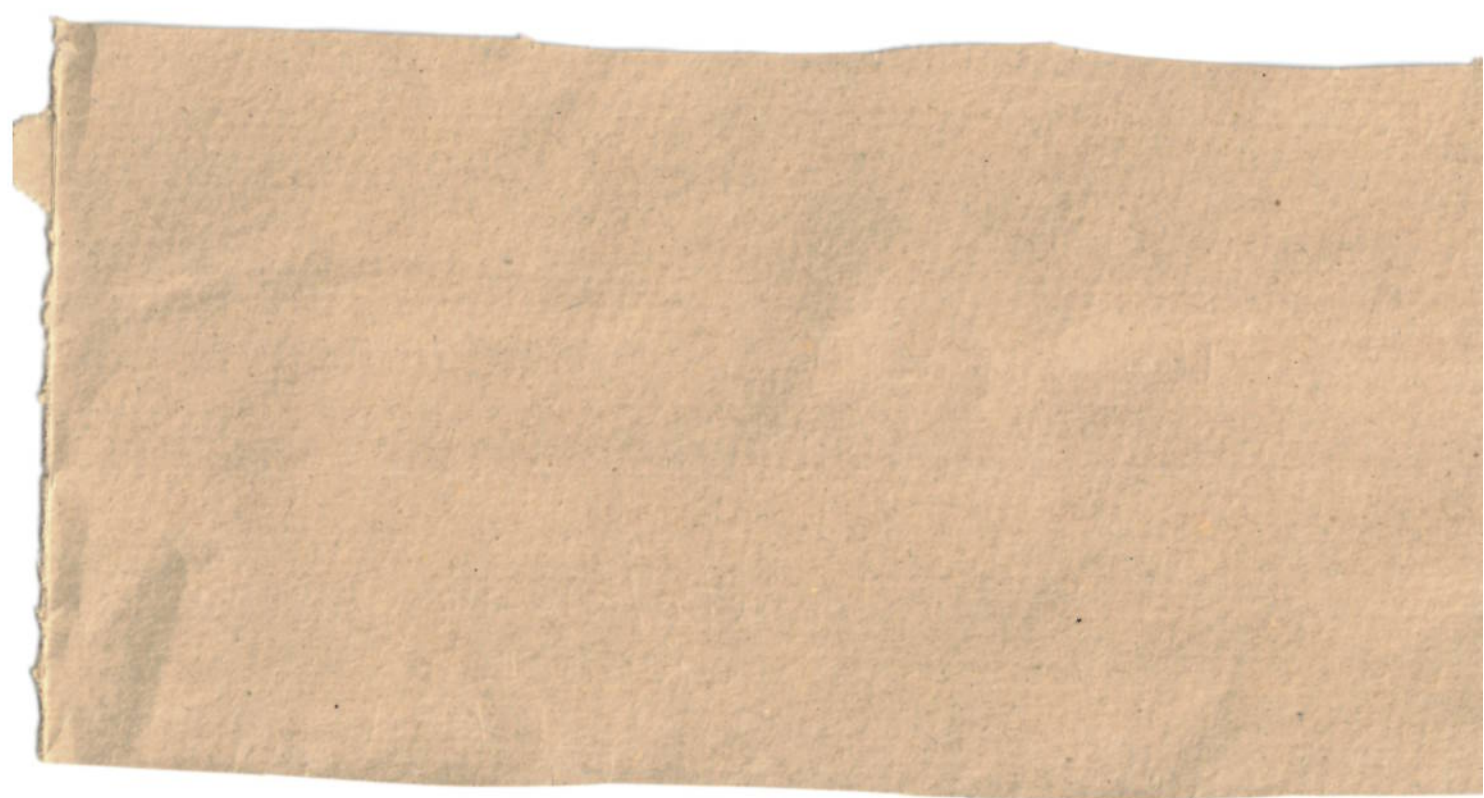
The Planning Inspectorate
The Square

Temple Quay

Room 30/P Temple Quay House, 2,

BRISTOL

BS1 6PN





20-7-20

The Planning Inspectorate
The Square, Temple Quay,
Room 30/P Temple Quay House, 2,
Bristol, BSI 6PN

Dear Sir,

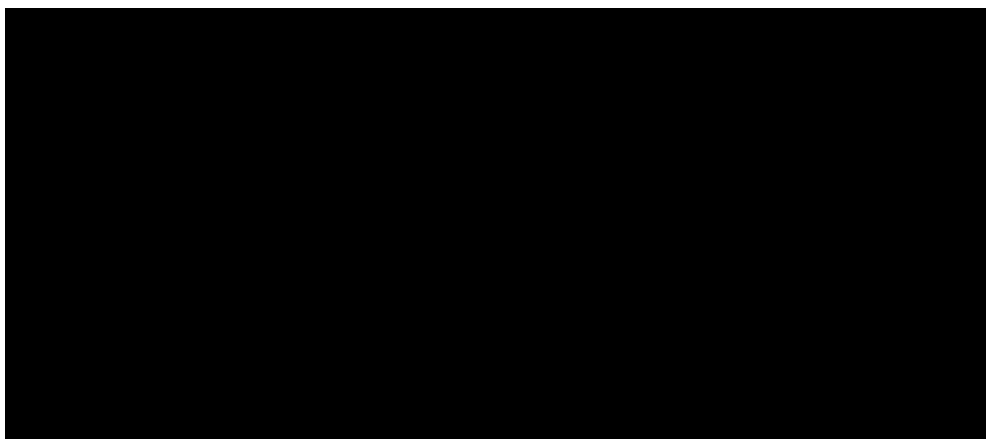
Re APP/18/00724 Havant Borough Council. Application for 195 dwellings at Sinah Lane, Hayling

We are writing to object to the application which we understand has been submitted for an appeal to the planning inspectorate. The proposal is for 195 dwellings at Sinah Lane on Hayling Island reference APP/18/00724. The number of houses is quite considerable for the area. Although it is not in North East Hayling, the area we represent, we will all be affected. So our comments will be in relation to that wider impact.

On this basis, we have attended several meetings on the draft Local Plan, and made our case known as have others have done, some with specialist reports, Sadly all have been ignored, and the application in question has arrived as a result of not seeing the wider picture, of the whole transport system, including the single road, and bridge, not to mention the junctions with the centre of Havant.

We all feel that the extensive local plan was prepared without fully taking this on board, but appears to be deeply influenced by the financial implications of the CIL payments being able to support relatively minor road improvements on the Island itself. Whilst these would be very welcome, we feel it should not be at the expense of the access to the whole Island, and utilising land that is subject to flooding, or bordering on SSSI land.

On this basis, we would object to major housing schemes such as this one: its overall effect on the Island and its fragile infrastructure would affect everyone of us.



The Planning Inspectorate

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YOUR COMMENTS ON THE CASE

I'd like to express my concerns about this development going ahead - the building of more homes when there are currently numerous (including affordable housing) already available on the Island. Additionally there will be no input into providing adequate infrastructure in terms of drs, sewage treatment, traffic etc in an area that already struggles. I have additional concerns about the site following the photos recently emerged of Sinah Fields completely flooded. This seems an inappropriate site and I would like my opposition to the development registered.

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YOUR COMMENTS ON THE CASE

The area designated to build the 195 new houses is known to flood every year. Guess who will end up picking up the bill when the new and surrounding properties flood, we the council tax paying residents of Hayling. If a flood risk has been carried out and come back ok then this should be investigated as it is obviously biased towards building new houses in unsuitable areas.

Maybe if the planning application was for something that benefited Hayling island like a sports hall or swimming pool then it might get some support but Hayling is just a cash cow for Havant council.

In case you hadn't worked it out I am against the new builds and feel that the area chosen is a catastrophe waiting to happen.

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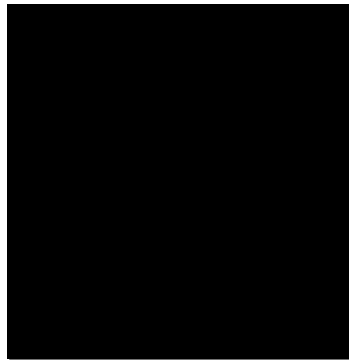
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YOUR COMMENTS ON THE CASE

My main concerns are regarding the sustainability of this development in the face of worsening coastal erosion, far in excess of the planned erosion losses in the most recent local plan as admitted by HBC. Slightly to the west of this site and a short walk you can see the continual erosion of land which is designated natural retreat and unlikely to attract any funding for protection. Over the last 2 years even access to Hayling Island has become more vulnerable at Langstone with rising sea levels.

My second point is following Brexit we are already seeing difficulties with certain foods and our government are saying we have to be more self sufficient. This particular field has always been in the top band for quality farm land and since I was a child produced top quality produce (born 1945). If built on we have lost yet another bit of this quality farm land and it can never be regained. We should halt development of this top quality land where ever it is and retain our ability to produce our food.



Milena Opolska

The Planning Inspectorate

Temple Quay House

2 The Square

Bristol

BS1 6PN

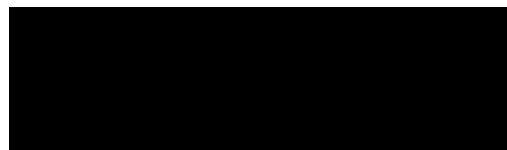
10th February 2021

Appeal reference: APP/X1735/W/20/3253633

Although I have already expressed my views opposing this development I would like to reiterate my concerns. Apart from the obvious unsuitability of the site, including drainage, accessibility and impact on the residents of Sinah Lane, the already heavily overloaded infrastructure of Hayling Island (Roads, Sewerage, Health Centre, etc.) cannot cope with any further development and no amount of tweaking will solve the problems.

Hayling island is a valuable asset for the Borough but its attraction is gradually being sacrificed to meet the demands of a governmental housing need, to the detriment of residents and tourism.

Commonsense must prevail. In my opinion there should be no more large housing developments on Hayling Island.



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Milena Opolska

The Planning Inspectorate

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The Planning Inspectorate

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Access to site for 195 properties is only a narrow neck for some 200+ vehicles. The site itself regularly floods and being adjacent to Langstone Harbour with its rising sea levels, the flooding will only worsen. In addition the site is a haven for several species of over wintering birds. The infrastructure to Hayling island is via a 2 lane bridge only, the smallest breakdown etc can cause instant long tailbacks of traffic, also the medical centre and schools will struggle to cater for the needs of some 400+ extra people. Very unsuitable site for some many homes.

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YOUR COMMENTS ON THE CASE

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.

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YOUR COMMENTS ON THE CASE

I object to the proposed development due to the following reasons.

1. The single road (A3023) with bridge link serving Hayling Island is extremely busy and has proved to be unable to cope with the current volume of traffic. Hayling Island is a very popular destination for holiday makers and day trippers and congestion becomes extreme during the Summer months. Traffic travelling South to the island often backs up on to the A27 and beyond to the A3(M). In the evening, traffic is often queuing the length of the island. During times of road works, service pipe failures and vehicle breakdowns the situation becomes much worse and there have been periods of gridlock. Further housing development would contribute to the serious problems we already experience.
2. The statement by Barratts that the Hayling Billy track is suitable for commuting is ridiculous and probably made by someone who has not walked or cycled along it. The track which is unlit has uneven and dangerous loose surfaces and additional use would cause further damage. Langstone Harbour is in close proximity to the track and erosion will be a continuing problem.
3. The existing infrastructure is already overloaded and making appointments for the Medical Centre can be very difficult.
4. The proposed development would have a severe impact on the ecology of the area. Flooding occurs on this land. Raw sewage overflowing into the harbour and sea is a well known problem.
5. Loss of more farming land on the island should not be permitted. Building should take place upon Brownfield sites.
6. The site would not serve local families in need of housing. Most people wishing to reside in new build properties on the island would move in to the area and work on the mainland.

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YOUR COMMENTS ON THE CASE

Further comments to the application.

Hayling island is a small island with 1 bridge as access point.

The Infrastructure is today inadequate for the existing home and windfall volumes.

Drainage for existing water waste backs up in north shore road (behind the planned houses). What this means is during the winter with rain fall such as this winter, toilets had I not flush away as the sewers are flooded and water rises in the toilet when this happens. This has been happening for at least the 14 years I have been here.

The field where it is proposed for development, is the most fertile plot for agriculture. It is clay based and hold alot of the run off for flooded rain water. It is like a lake now.

The exit road for these houses will be onto a narrow country lane which leads to A3023 main exit road. Station road is so narrow that if a bus and car travelling in opposite directons, they would collide. I have photo evidence of the bus mounting the pavement.

The wildlife has purposely been moved off the land. Geese, deer here and fox dens.

The erosion along the farm land is continual and there is no budget allocated from coastal partnership management to maintain defences.

Drs surgeries are over prescribed as are chemists.

Many children go off the island for schools as there are not enough spaces.

Work is mainly off the island so an increased of traffic and congestion. We have linked cycle routes to aid easy transportation so small car journeys are done. There is little work for families to live and work locally.

This will make Hayling a ghost town. New homes do not create local jobs. This is old data in my opinion. Community is lost as we have deliveries of goods. Infrastrucrure has not been fully assessed or acknowledged by council.

I believe there are better sites for Havant Borough Council to build home. With better access to work. It will take 1 hour of travel to go to the neighbouring town of Portmputh for work. Which is 10 miles away. This is costly and creates a break down in family life.

Barrets needs to have a sustainable community development plan and respect the environment.

Homes narrates build are not susraoabke as no solar panels are include or any other type of renewable energy. How can any one pass these applications?.

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Ms Milena Opolska,
The Planning Inspectorate
Temple Quay
2 The Square
Bristol
BS1 6PN

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Ms Milena Opolska
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

24th February 2021

Dear Ms Opolska,

Planning Inspectorate Appeal Reference: APP/X1735/W/20/3253633
Erection of 195 Dwellings on Sinah Lane, Hayling Island

We have strong objections to the building of 195 dwellings on the green field site on Sinah Lane, Hayling Island for the following reasons:

1. **Environment** Hayling Island has a beautiful coastal landscape and currently has a good mix of residential, a few small commercial businesses and arable farmland. It has always been a very pleasant and safe place to live and visit on holiday. In the last few years this situation has been eroded by the reduction of green spaces with more and more land being used for residential and building developments, several constructed recently, for example on Sea Front, West Town, Elm Grove and Manor Way, many of which are still empty. **This has to stop.** To state the obvious, Hayling is an island and once all the green spaces have been built on, the ambience of the island will be lost. Unlike a town on the mainland where, however large, people can leave built up areas and go into green spaces, on Hayling that would simply not be possible. Hayling must keep its green spaces, not only for the wildlife but because it acts as a valuable amenity for its inhabitants.
2. **Traffic** There is no doubt that the most serious infrastructure problem on the island is the A3023. Being a narrow single lane carriageway and the one and only road, it is constantly busy and frequently blocked in both directions. It is not helped by the traffic problems at the Havant roundabout. It can take as long as 45 minutes to get on or off the island. A further 300-400 cars joining this circus is madness. Recent events such as the chaos created when the water main burst indicates the vulnerability of the infrastructure on this road, especially as the local authority seems to have no contingency planning for such events. In addition Southern Water frequently has problems with sewage removal. There have been a number of cases in recent months when tankers have had to be called in to remove waste water because the present sewage system cannot cope. To consider this application before the infrastructure is improved simply does not make any sense whatsoever.
3. **Hayling Bridge** We have doubts that the Hayling bridge, built in 1955, is safe given the increased number of vehicles, some of them being the heaviest HGVs, using it. The problems associated with poor maintenance and the lack of regular inspections that occurred on the continent in the last few years must not be repeated here. The planned capacity of the bridge must have been exceeded by now. The bridge is already showing signs of deterioration and although the Highways Authority has acknowledged this by announcing that a survey is about to be conducted, it will be several years before any remedial work is carried out. In the meantime if there was a problem with the bridge what emergency planning measures does the local authority have in place to deal with such a crisis, bearing in mind it is the only way on and off the island?

4. **Employment** There is very little employment on the island. Indeed in the last few years a number of businesses have closed, including all of the banks. All those moving into these houses will have to seek employment off the island thereby increasing traffic on the A3023. By the same token there are very few leisure facilities on the island and young families will have to seek such activities elsewhere thereby further increasing the traffic on the road.

5. **Flooding** A major issue is over Havant Borough Council's policy on the protection of the sea defences, a critical matter considering Hayling is an island. The council has acknowledged that it is no longer to continue protecting the shore line and as a result has removed all the revetments at the west end of the beach. It proposes to allow the sea to encroach onto land at the west end and for a new shore line to be created. How much of the beach will be lost and how far this encroachment will occur has yet to be determined. That this new development is at the west end of the island simply does not make any sense.

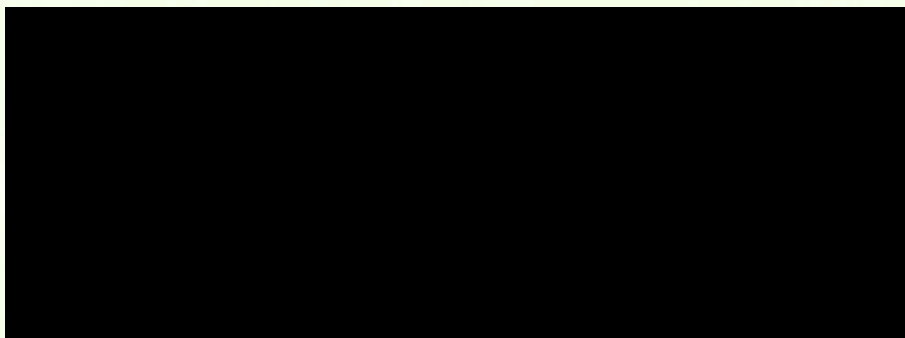
6. **Medical** A major problem, which will be exacerbated with an increased population, is the time it takes to get a doctor's appointment. To see the doctor of your choice the delay can be as long as 4-6 weeks already. This is unacceptable now and will only get worse.

7. **Cycling safety** The site the developers have chosen is one on a major cycle route to and from the Hayling Billy trail, which is used by both adults and children. We frequently take our grandchildren on cycle rides passed the proposed entry point of the estate. Safety will be significantly reduced if this application goes ahead.

8. **Pollution** Flooding, waste water, pollution of the environment are all additional factors that effect the infrastructure on the island and improvements must take place before this application should be considered.

For all these reasons we object strongly to the proposal to build 195 dwellings on Sinah Lane. Would you please make our objections known to the Planning Inspectorate.

Yours sincerely,



The Planning Inspectorate

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Appeal By BARRATT HOMES

Site Address
Land north of Sinah Lane
Hayling Island
Hampshire
PO11 0HH
Grid Ref Easting: 470824
Grid Ref Northing: 99851

SENDER DETAILS

Name

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
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- ☒ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

We object to the application to build 195 houses in this application. The site is currently an arable field waterlogged from November to March each year, the foreshore is eroding each year to a significant amount; this is totally unsustainable for 195 homes. A development of this size has not the required infrastructure, the roads around the site and the Havant Road can not cope with the current level of traffic in the summer months another 600 plus vehicle movements daily will only add to the islands existing traffic problems.

The local services, schools, doctors and dentists can not cope with the inevitable extra numbers a development of this size would hold.

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YOUR COMMENTS ON THE CASE

I am writing to object to the proposed development from three perspectives:

- I am a resident of Hayling island impacted by the effects of 195 new homes on traffic, amenities and public services
- I am a professionally qualified geomorphologist and I see some serious errors of omission in the flooding impact assessments
- I am the founder of one of the UK's largest transport data companies and I see flaws in the transport mitigation plan

1. Resident

The proposed development will load traffic, emissions and runoff onto the island's infrastructure which are more finite than most locations as the site is on an island that has one exit road, high groundwater within London clay and many protected areas such as SSSIs in close proximity. Havant Borough Council and Hampshire County Council are highly constrained by national public spending limits and cannot mitigate impacts such a single exit road in spending terms.

2. Ground water flooding

The flood risk assessment March 2020 fails to recognise that the main flooding risk is groundwater flooding not coastal or runoff flooding. The flood risk assessment actually says "A review of the groundwater levels indicates that the risk of groundwater flooding to the development is low" Professionally I find this statement to be negligent with respect to the geology, the flooding experience and the known risks. On purchasing my own house in the south of Hayling Island my Groundsure Avista search by Ambiental flood risk analysis characterised the groundwater flood risk as High, and my insurance has been loaded accordingly. My property is on the same London Clay as the proposed development. As local residents have seen, the site has been flooded with standing water for c. 2 months this year due to the winter rain ponding up on top of the London Clay. The proposed mitigation is to direct surface water away from the development into an adjacent basin, however, given that the entire development has been flooded this winter to a depth of c 10cm, it is clear that the runoff capture will not have sufficient capacity. This will lead to run off into existing water courses polluting them with oil and tyre particles with implications for the health of the existing water course to the north. At times of high tide, the falls in local water courses are severely reduced and this inhibits natural drainage. This will mean that the cost of insurance would be high for the residents of the proposed development, the extra runoff from their additional hard surfaces will add to local flooding risk, and local tax payers will have to pay for such mitigation measures as are feasible such as pumping into the harbour with all the extra emissions and pollution impact this could bring. This problem alone should make this development infeasible at any reasonable costs and I therefore urge the Planning Inspectorate to reject this proposed development.

3. Transport

The Travel Plan prepared for the developers is my professional opinion quite unrealistic and selective. From the centre of the site (and many houses would be further away), the closest convenience store and pub are between acceptable and max permissible by the CIHT guidance at 600m and 500m respectively. It is very unlikely that people will walk such a distance, especially over the winter in the dark and so this development will clearly generate many more car journeys to reach local facilities, which will make it more difficult to reach net zero in carbon terms and impose new traffic impacts on existing residents.

Local bus services will offer very limited capacity for 195 new households to commute for work off the island as the vehicles serving the 30/31 route are often a single decker. If you add reliability buffer time (the amount added by travellers to be sure to complete their journey in time) the 30 min bus frequency will inhibit commuting due to the time cost of missing a bus or the need to add a large amount of time to catch the bus earlier than the one you need to be absolutely sure of getting to work on time. At 310m from the centre of the site the nearest bus stop is likely to be 0.5km for many of the proposed residents, and evidence suggests that this is beyond the distance that most people are prepared to walk.

The opportunities to use active travel methods like cycling are very limited on Hayling, especially in winter. The Billy Trail is not surfaced for most of its length and there are huge water-filled holes in it

during the winter. My experience of trying to cycle on it at 5pm in January was that it was very hazardous without lighting or a sealed surface. It is very unlikely anyone would use it to commute regularly through a good half of the year. If you were to take the road from the development off the island then eventually you are forced to run the gauntlet of 40mph car traffic on the A3023 on the approaches to the bridge, and this is quite dangerous at times, and completely unsuitable for children.

On the grounds of local impacts, groundwater flooding and poor transport links, this development should be rejected.

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YOUR COMMENTS ON THE CASE

I wish yet again to strongly object to this planning application which continues to demonstrate that the impact of development on the local community has no bearing on the decision. For many reasons better articulated than me this proposal demonstrates that the presumption is always in favour of development and clear reasoned objections have simply been ignored. Money is more important than the wellbeing of residents or the flora and fauna we share the island with.

Over the last few years Havant Councillors and Officials have verbally, in written replies and publications stated that the residents of Hayling Island are their number one priority. I hope and expect that this is an honestly held position. Approval of this application would be diametrically opposed to that and would represent a failure by Councillors and Officials to meet their core responsibilities.

Residents of Hayling fall into several categories, the people who live, work and visit here and the wildlife we share our space with.

The impact on people will be significant. Traffic conditions on the Island (as those of us that live here know) sits on a knife edge at present. Significant queues on and off the island are a regular occurrence and to add an additional 400 vehicles to this mix would exacerbate an already unacceptable situation. We have seen numerous occasions when traffic has been brought to a standstill either due to minor incidents, parked vehicles or sheer weight of traffic of visitors traveling down. The response times for emergency vehicles are already below target and to make matters worse by introducing further traffic without first undertaking a significant upgrade to road networks puts people lives at additional risk. We saw during the summer jams which did not clear until 10pm in the evening. Tourists will choose to go elsewhere removing income streams for our businesses.

Other island infrastructure is already at capacity particularly sewage where we see regular incidents of raw sewage being released into the waters surrounding Hayling. This is a health threat for those that live here, wildlife (including the marine environment) and if we want our tourist businesses to survive, we must remove threats of pollution. In addition to general sewage issues we also have the very real issue of nitrate pollution. This development is not nitrate neutral and will make a bad situation even worse. Adding the impact of rising sea levels, rising ground water and flooding which specifically affects the planned area again how can this development be approved. Why are we even considering the loss of prime agricultural land, generating increased surface water run-off which along with so many aspects of this application are at complete odds with the National Planning Frameworks.

Our schools, medical services are also stretched beyond capacity. Without significant mitigation in terms of new school buildings, extending surgeries etc.. these services will either break or deliver a sub-standard service. I always understood education of our children as an imperative.

Turning to the impact of wildlife. The specific area has until recently been farmed or left fallow in manners which ensured the habitat was not suitable for Geese. But as soon as normal farming returned in the last month the geese have also returned and have been using the land planned for housing as a sheltered area particularly in bad weather. I thought their habitat was protected, apparently not on Hayling.

Generally, I found the ecological reports supporting the application to be entirely inadequate and providing deficient and incomplete advice to the decision makers. We focus rightly on Geese but in addition the specific planning area supports many raptors including peregrine falcons, kites, honey buzzards, buzzards, kestrels, sparrow hawks and tawny owls all of which I see on a regular basis. These would not be here if there was not a thriving community of prey species. I also note the comments on slow worms having a very limited community of a handful of adults and young. I have seen five in my own garden at same time and cannot believe the whole population was here at the same time. I have also seen grass snakes in the field along with common lizards.

We also have a large population of bats and I see them in the summer flying across the gardens and fields.

Finally, we also have a large population of stag beetles every year. I was under the impression that stag beetles like many of the other species mentioned above that live here were in decline and protected. Why is it that these protections do not apply on Hayling? The answer is that of course they do. We need a proper ecological survey which recognises the importance of this habitat and put in plans to protect and enhance it. Not build over and destroy it. The application be rejected on this basis alone.

The proposed development design itself is at odds with planning rules. The density is out of character

with the immediate area bordering the development to the extent that some many houses have been crammed in there is a completely inadequate provision for numbers of parking spaces which would inevitably either spill into surrounding areas and further impact emergency vehicle response times. The nature of the house designs combined with density also delivers a significant loss of privacy for surrounding houses. To go from a situation where you have two neighbours to one of having six new houses overlooking yours at the end of the garden as is the case for my home is completely unacceptable under privacy and noise rules in the planning frameworks, This situation is repeated at multiple points on the boundary and as a result the application should be rejected. It seems that developments such as this are focussed at a macro level and specific impacts on residents completely ignored.

Finally, I would just like to comment on the process itself having listened to the last advisory meeting which discussed and approved the plan. I hope that the approach of that meeting which did not follow correct procedures, did not take into account the detailed responses of individuals and representative groups, applied pressure on councillors to approve despite their clear misgivings (as a result of incorrect legal advice that if rejected the council would have no input into the appeal process) will not be repeated in a full meeting.

This decision is vital to the future of Hayling and as the imperative to build in green spaces has now been removed by the governments u-turn on new housing distribution to focus on city / brown field development this has again to be rejected.

Please reject this to ensure the lives of everyone on Hayling are not blighted by this ill-conceived development.

The Planning Inspectorate

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What kind of representation are you making?

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YOUR COMMENTS ON THE CASE

I do not support the proposal to build 195 dwellings on the land between North Shore Rd and Sinah Lane.

The road, utilities and public services infrastructure of the Island are not adequate to deal with the increase in extra people and cars. Medical services on the Island are already severely stretched, and so are utility services. Mains water pressure is low and already a problem for residents.

In West Town Hayling Island we have already had many new dwellings built in side roads near the Station Theatre, on Station Road, on West Lane and on the Havant Road and its side roads - these have provided additional housing in this area without adversely impacting services or disturbing the rural nature of Hayling.

The loss of this field would also have a detrimental effect on local wildlife.

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COMMENT DOCUMENTS

The documents listed below were uploaded with this form:

Relates to Section: REPRESENTATION
Document Description: Your comments on the appeal.
File name: Sinah App Dec obj.docx

PLEASE ENSURE THAT A COPY OF THIS SHEET IS ENCLOSED WHEN POSTING THE ABOVE DOCUMENTS TO US

I am objecting to this Application APP/20/01093 for the following reasons:

1. 195 homes & their families will add a disproportionately damaging load to the nitrates damaging our irreplaceable marine environments. Havant B. Council's Ricardo Energy f& Environment Report 15/06/20 concludes: "New housing development provides a source of nitrogen, through increases in wastewater production and surface water runoff." and the increased discharge into Budds Farm WwTW will impact on both Chichester & Langstone Harbours which are SPAs, Ramsar Sites, AONBs & ecologically sensitive. Increasingly heavy seasonal rainfall frequently breach nitrogen loads in both harbours and there is now evidence that the Eastern Solent's weak tidal flows may even be sending treated sewage back into the harbour entrances. The Applicant's claim that the new homes' water usage will be kept to 110L may be unrealistic: it is well known that householders can alter eg shower and tap usage systems in order to access the water they want.
2. Insufficient inter-agency work is taking place between Consultees concerning the high water table on the Application's site. Whilst the Environment Agency (EA) has recognized the known sea rises – without storm surges – of at least 1metre and Sinah's Flood Risk 1 level rises to a flood risk of "more vulnerable" according to NPPF guidelines (RCP Report 3.8 p.7 in Consultee Docs), with no flood defences planned by the EA. In other low-lying coastal areas, groundwater inundation (GWI) describes flooding that occurs as groundwater is lifted above the elevation of the ground surface and/or buried infrastructure. It has been identified as one of the more difficult flood mechanisms to manage owing to its ability to evade coastal barriers designed to mitigate direct marine flooding [not planned for Hayling]. This mechanism is expected to produce increased flooding relative to the direct marine source due to coastal groundwater levels being generally elevated relative to local mean sea level (LMSL) and directly influenced by sea-level fluctuations such as tides, wave set-up, and longer period sea-level. Barratts' planned SUDS is still a relatively new technique and, more importantly for 195 new householders, anyone buying a property will be jointly liable for the costs of expert maintenance management teams, not only of essential roads and underground pipe-work, but for the essential SUDS. Is it fair to burden enthusiastic buyers with property management costs which can only escalate and detract from future sales? Management teams can be sold on/taken over by other teams whose expertise may be less effective but the householder remains liable for future flooding or breakdown of the system so that its drainage properties become compromised by rising sea levels.
3. HBC Councillors, tasked with making these important long-term decisions, have not all understood the key elements affecting this site. At the Development Management Committee October 29th 2020 'debate' re the previous Sinah land Application, of the 5 voting Councillors: 1 stated that they'd had no time to go through all the papers sent on this Application – this Councillor still voted for it: 2 repeatedly urged the other 3 Councillors to accept HBC Officers' expertise so ignore the residents' Deputations, and accept Government numbers to include this site; only 1 raised the unresolved questions & site constraints. The fundamental tidal locking issue was not explained but confused with tide-locking. Tidal locking is a hydrogeological process which accounts for the underground water stored beneath

the surface, which rises and falls due to the tidal pressure of the Harbour(s) adding to surface water flooding. This has not been examined by independent experts on whom the Council should be relying for unbiased reporting.

4. Best Most Versatile Agricultural Land BMV: it is ridiculous and short-sighted planning that Sinah Field as BMV is not being preserved for appropriate low-nutrient agricultural management in order to help feed our region's rapidly expanding population and so help to reduce the cost of importing more food in future BREXIT circumstances.
5. Hayling's road network infrastructure, particularly adjacent to Sinah Field, comprises Station Road and West Lane, both of which are closely bounded by many existing homes and businesses so cannot be widened. They are old rural lanes, developing in an agricultural, low car ownership period so not only lack suitably wide pavements in many parts to accommodate prams/pushchairs, but any pavements in places. Even the A3023, the only route on/off the Island, is single lane with narrow pavements so cycle routes on the Island inevitably include very busy road lanes for all traffic. Commuters from Sinah Field will add to a heavily congested A3023.
6. Consultee on Parking noted the low allocation of parking spaces on the site, requiring a Traffic Regulation Order if the APP is approved. This further demonstrates the unsuitability of this site for so many properties and the disregard for the future needs of those living in these properties. It also shows a flagrant unconcern for the overspill of vehicles that, without proper parking allowance, will cause potentially dangerous and certainly highly unsuitable roadside parking on an important access route to residential roads. It must be noted by authorities that on Hayling, there is frequent parking by vans and cars on both double yellow lines and grass verges along residential roads. This can only be the result of totally inadequate enforcement by Hampshire County Council roads & highways of existing laws.
7. Bird Refuge: More land on Hayling than just the proposed onsite bird refuge is needed, in order to compensate for the loss of land already due to earlier development ie the Oysters off Station Rd., and in order not to fragment the existing Primary Support Site for the Brent Geese and Waders. It is patently absurd to provide so-called 'mitigation' sites miles away from the original, sustainable, sites, expecting wildfowl to 'find' these. Those intent on building at all costs, including the Government's Quangos namely Bird Aware & Natural England – tasked & funded to enable Government policy – have neither the expertise nor the genuine interest in providing genuine wildfowl habitat that will survive "in perpetuity" which means 'without termination', & that must be foreseeably able to survive the next 60 or more years of sea rises. These of course will flood Hayling's western coastline, which is already falling into the sea adjacent to the Billy Trail, therefore the proposed wildfowl mitigation sites north of the Sinah site, will inevitably be further reduced by erosion as well as by the marsh area that the IN1K straddles. Additionally the proper management of onsite and off-site refuges is also unsustainable in perpetuity. All these issues remain unresolved.

For the sake of our future and that of those residents who trustingly purchase any new development's homes, believing that the Council has ensured fully independent consultations have covered the many contentious issues arising on this site, please refuse this Application. More time and independent work is needed so that residents, future tax-payers and private citizens are not lumbered with intransigent problems making their homes unsaleable at worst and costly at best.



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YOUR COMMENTS ON THE CASE

I object to the proposed development due to lack of consideration and mitigation of increased road traffic on and off the island over the bridge - which is already inadequate.

I also object to the lack of architectural design quality of the proposed dwellings as well as the site planning.

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- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence
- ☐ Other

YOUR COMMENTS ON THE CASE

Hi,

I am submitting messages I have sent to Havant Borough Council in the last few days re. this proposed development which I object to as an existing resident adjacent to the site.

If the photos do not come through, please let me know and advise the best way to send them.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]com

I am hereby submitting the following as a written submission in respect of the Planning Committee meeting on 10.03.2021

Regards,

[REDACTED]
[REDACTED]
[REDACTED]

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,



Image.jpeg

Dear Councillor,

I have submitted a written deputation on the above to assist you in your decision-making this evening on the above application. I highlighted the dangerous situation of a pinch point on Station Road which will be the sole direct route for the development's 500+ residents and 300+ vehicles to shops, schools, etc at West Town, Mengham and beyond and to get off the island - as well as for visitors, delivery vans etc.

The Highways Authority, despite declaring an overall no objection to the application, albeit with conditions attached, have described the Station Road highway and footpath issues as "not ideal", "below minimum widths", and "constricted by the highway boundary limits". The Authority has also shown its lack of research and understanding of the local situation, which unfortunately seems not to have been picked-up and/or corrected by the relevant HBC staff.

I attached one photo to the deputation, which you may have read by now, but because of a limit on the number of words I could not include other evidential photos, all taken in February in the space of a few minutes, looking west on Station Road towards the development entrance and about halfway between it and West Town.

To assist you in your decision making, I attach them below.

The first and second show a large truck hurtling through this dangerous pinch point area. Note the width of the road and the narrowness of the footpath, especially the northern one on the right - the same side of the road as the development:

Image.jpeg

Image.jpeg

The third photo shows traffic being stopped at the builders merchant yard about 30m closer to the development by a large truck reversing into the yard. There is a fencing company on the other side of the road where trucks either reverse in or park on the road/footpath, as do trucks waiting to enter the builders yard.

Image.jpeg

Image.jpegImage.jpegImage.jpegImage.jpegImage.jpegImage.jpeg

The final photo shows a resident of Barratt's Oysters development, also on the north side of Station Road, walking towards his home - that's the entrance just coming up. Please note the complete absence of a footpath - and yet Barratt claims, in their application for this new development, that the footpaths have been "enhanced" because of the Oysters estate.

Image.jpeg

I hope these photos give you second thoughts if you are minded to approve this application because the situation is a accident waiting to happen. I appreciate that there may be other compelling reasons to grant permission, but we are dealing serious health and safety issues here which have not been properly addressed.

Regards,

Dear Councillors,

Having written to you individually yesterday about the dangerous pinch point on Station Road Hayling Island, in addition to my written deputation, I felt it incumbent on me to follow up after the Planning Committee meeting last night. Especially as the situation was inadequately presented to you by the Principle Planning Officer, in my opinion, as I will explain.

In what can only be explained as a diversion tactic, the officer showed you a photo of the so-called "pedestrian crossing" on Station Road which Barratt claims was installed as a result of their Oysters development. This crossing, and one supposed to be installed at the new development's entrance, will enable the new residents, as proposed by the Highways Authority, to cross Station Road once, and then cross it again all in the space of a few hundred meters, in order to avoid the footpaths "below minimum widths" on the way to West Town. I attach a screenshot of the slide the officer showed you:

I have to say I was surprised that none of you questioned the officer as to where the "pedestrian crossing" actually was in the photo. I contacted her by email to point out that the Highway Code defines five types of pedestrian crossings, zebra; pelican; toucan; puffin and equestrian, none of which are present in the slide.

I received a reply from the officer as follows:

"The pedestrian crossing on Station Road is uncontrolled and consists of dropped kerbs and tactile paving. This form of crossing facility is widely recognised across the country and is specifically referenced under Rule 10 of the Highway Code and technical guidance documents."

So I looked up Rule 10 and this is what it says:

"Rule 10

Tactile paving. Raised surfaces that can be felt underfoot provide warning and guidance to blind or partially sighted people. The most common surfaces are a series of raised studs, which are used at crossing points with a dropped kerb, or a series of rounded raised bars which are used at level crossings, at the top and bottom of steps and at some other hazards."

In other words Councillors, this seems to be a crossing for blind or partially sighted people! In this form it consists only of a dropped kerb and six small pimped paving stones on each side. See photo below. There are absolutely no markings on the road or signs anywhere saying it is a crossing.

Image.jpeg

I was passing it today and stopped at it for about five minutes. About 10-12 people came by. I asked each of them did they see a pedestrian crossing anywhere nearby. All of them looked at me as if I had a screw loose, and said no. When I explained to them that the Council (and the Highways Authority) consider it to be one, most of them just shook their heads.

One of them was actually a resident in the first house of the [REDACTED] whose house overlooks the "crossing" and is no more than 20 meters from it. He did not know it was a pedestrian crossing.

Please note also that the "crossing" is actually on the west side of the Oysters' entrance, i.e. the side away from West Town and the direction most residents would be heading. And why? Because there is no footpath on the same side of the road as the Oysters' entrance. See photo.

Image.jpeg

Of course there was no point in stopping car or truck drivers, they would be even more bemused. I have driven up and down Station Road hundreds of times since the Oysters was built and have never noticed a "pedestrian crossing". Nor have friends and neighbours I have spoken to. I pity the poor person who walks into the road expecting traffic to stop.

Please recall that you were offered no photos of the dangerous pinch point on Station Road that I informed you about in my deputation and my email to you. It was however mentioned by the officer who said it has been looked into but that there was no scope for further improvements. In other words, and also confirmed by the Highways Authority, we know "it is not ideal" but we can't do anything about it! But we are happy to recommend it to you.

So Councillors, with 500+ new users of this pinch point coming along now that you have signed off on it, I do hope you might be inclined to have some further research into it by an independent consulting company, and not Barrett's own consultants, the HA or HBC's own people who unfortunately have been shown to be below par or have an agenda, given that the risk to life is there for all to see and the existing research has been shown to be flawed.

Mr Chairman, I would be most grateful for your response.

Yours,

[REDACTED]

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/X1735/W/20/3253633

DETAILS OF THE CASE

Appeal Reference APP/X1735/W/20/3253633

Appeal By BARRATT HOMES

Site Address
Land north of Sinah Lane
Hayling Island
Hampshire
PO11 0HH
Grid Ref Easting: 470824
Grid Ref Northing: 99851

SENDER DETAILS

Name

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
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- ☐ Other

YOUR COMMENTS ON THE CASE

I wish to object to the proposal to build 195 dwellings on the land between North Shore Rd and Sinah Lane.

The infrastructure of the Island cannot cope with this number of extra people and cars, I estimate 400 additional cars (2 per household). Road access on and off the island is already very slow at peak hours and at a standstill during sunny weekends. When the water main burst on Havant Rd on 14 June 2019 it was a disaster. I had to collect my 88 yr old father from Day Centre in Leigh Park that afternoon, and the round trip took 5 hours. Dad suffers from severe Alzheimer's Disease and incontinence, so this caused immense personal stress and discomfort. Response time for emergency vehicles is continually affected by traffic problems and especially on that day.

In West Town we have already had many new dwellings built in side roads near the Station Theatre, on Station Road, on West Lane and on the Havant Road and its side roads. It is more than enough for this area and further development would spoil the tranquil character. The proposed density of new houses to be built by Barratt is completely out of keeping, and points to greed on the part of the developers. There may be some "affordable homes" in the mix but it is a well-known trick to include a proportion of such homes on initial plans to get through the planning process, and then to greatly reduce the number during the building period. The proposed site is low lying land which is prone to flooding during periods of heavy rain. The loss of this field would have a highly detrimental effect on local wildlife. As for the proposed "Wildfowl refuge area" on the adjacent field, this is surely another sop to the planning process? It is currently one of the least favoured spaces by the local birds who frequent the harbour. When not on the water, the seagulls and Brent Geese much prefer the fields a little further north, between the Billy Trail and West Lane.

Medical services on the Island are already severely stretched, and so are utility services. The mains water pressure is worryingly low and already a problem for residents. I do not know a single local resident or tradesperson who is in favour of this development.

The Planning Inspectorate

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- ☐ Other

YOUR COMMENTS ON THE CASE

I moved to North Shore Rd, Hayling Island in 2006 to escape from the density of housing and cars in Southsea. I wish to object strongly to the proposal by Barratt Homes to build 195 houses on Sinah Field. This is three times the density of housing in my road and totally out of keeping with this (currently) tranquil area. I am now 88, not in the best health, and unable to move again.

The island's main access road cannot cope with additional traffic load and the water supply is such a low pressure it can barely service existing residents. There is no provision for emergency services access when the road bridge becomes blocked at Langstone, and blockages further down the main road have disastrous consequences for all road users.

Furthermore, the loss of open farmland will have a detrimental effect on wildlife and biodiversity. Please do not build on our precious open spaces.

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

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- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence
- ☐ Other

COMMENT DOCUMENTS

The documents listed below were uploaded with this form:

Relates to Section: REPRESENTATION

Document Description: Your comments on the appeal.

File name: Planning inspectorate.pdf

File name: Oysters brent geese mitigation.pdf

File name: Minutes of meeting with HBC planning officers dated 14Nov18.pdf

PLEASE ENSURE THAT A COPY OF THIS SHEET IS ENCLOSED WHEN POSTING THE ABOVE DOCUMENTS TO US

RECORD OF MEETING WITH HBC PLANNING DEPT – 14 NOVEMBER 2018

Attendees:

David Hayward – HBC Planning Policy Officer

Daphney Haywood – Case Officer for APP/18/00724

████████████████████ resident since 1994

████████████████████ resident since 1988

████████████████████ resident since 2012

- 1. Background.** As a result of the recent planning application submitted by Barratts to develop 195 dwellings on land to the north of Sinah Lane on Hayling Island (APP/18/00724), there has been considerable concern from Hayling residents about the impact on the infrastructure and local environment as evidenced by the subsequent negative comments/responses. The issues regarding the infrastructure are being addressed by the Hayling “Save Our Island” group and the HI Residents Association. However, there is grave concern about the impact of the proposed site on the wintering of Brent Geese and Waders on the designated land (H34C). ██████████ had highlighted the conservation concerns in the email to Councillor Issy Scott dated 18 September 2018 as at Attachment A. This document also includes the issue on mitigation of certain elements on the recently complete “Oysters” development by Barratts to the north of Station Road. These points were clearly stated in letters of objection from local residents and in a deputation presented to cabinet in 2016 at the DCM in 2017 by local resident Rosie Law.
- 2. Aim of the Meeting.** HBC Planning Department invited the above Sinah Lane residents to meet in the Public Services Plaza to discuss the concerns previously expressed as outlined in Attachment B which formed the basis of the discussion. In addition to the environmental issues, concern was expressed on the highway safety implications at the entrance to the site off Sinah Lane.
- 3. Conservation Regulations.** Mr Hayward opened the meeting by outlining the regulations by which HBC and potential contractors are bound when assessing the implications of building on the habitat of certain species. The EU directive on “The Conservation of Habitats & Species Regulations 2017” at Attachment C para 63 provides such broad guidelines. He explained that very little guidance was offered by Natural England, any regulations were subject to frequent changes, and that they also had to consult with other agencies such as the RSPB and relevant Solent Environmental bodies. HBC now have the challenge of finding a net bio diversity gain as a result of new developments.
- 4. The Oysters Mitigation Issue.** ██████████ confirmed the reasons for attending the meeting and reinforced that it was not a case of “nimbyism” but to understand better the processes and procedures before/during and after the submission of building applications., specifically the Oysters mitigation concerning the wintering of Brent Geese on field H34C. He further stated that the residents are struggling to trust the effectiveness of the planning process if the developers can ignore their commitments.

- a. **The Oysters Development.** HBC confirmed that the post development monitoring of the Oysters site was in the hands of a management company/co-owners, having been transferred from Barratts. They also advised that the “dead end” road at the north of the site was access for Suds maintenance and for farm vehicles to the field. The field to the north of the Oysters had been suggested for development but turned down by HBC.
- b. **Boundary between Hayling Billy Trail (HBT) and field H34C.** (Att B Questions 1, 3, and 6 refer). HBC confirmed that the Oysters Mitigation actions didn't happen as they should have been carried out. Also HBC are aware of the belated attempt by Barratts to partially meet the Oysters mitigation to prevent loose dogs from getting into the field from the HBT and disturbing foraging Brent Geese in the winter. **They accepted that this issue should have been better monitored, lessons had been learnt that would result in a much simpler and robust monitoring process going forward.** HBC confirmed that negotiations were proceeding to rectify the situation via the HBC enforcement office. It was also agreed that notices on relevant sections of the HBT to explain the reasons for the fencing would hopefully prevent further damage to the present fencing efforts - Barratts claim to have repaired this fence 3 times although this met with some scepticism from the residents who are regularly monitoring progress(or lack of). A request to dog owners to keep dogs on the leash during the migration period was also suggested. It was observed by the residents that the current fence solution are not fit for purpose and a more robust design required. The residents also observed that the current fences to fix the 'porous boundary' had only been installed at **the northern end of the field** whereas the oysters mitigation identified that the complete H34C boundary needed securing. **HBC**
5. **Field to the North of Sinah Lane (H34C).** (Att B Questions 2 & 4). On recent outline plan documents the field has been split into 3 distinct areas. HBC suggested that it had been a joint HBC/Barratts decision to show the southern development area, the northern refuge area and the narrow area between the two. HBC was not aware that the field had only been sown in the northern part of the H34C field, the 'primary site for Brent geese', which would skew any geese population monitoring survey results carried out this winter and not reflect good practice or a fair test. However, it was the farmer's prerogative to manage his crop rotation strategy and the **Sinah Lane residents agreed to pursue the reasons for the change and report back to HBC for information.** Mrs Law advised that the Northern end of the site had only sporadically if not rarely, been used by birds this year and that was after bird scarers had been used on the field North of Little Wood where a large flock of the geese (100+) appear to be foraging on winter wheat this year. The planting regime may well have made the field H34C less attractive as the area of the foraging crop, winter wheat, is considerably smaller compared to the whole of H34C being planted. The planting regime could be artificially hindering the number of geese choosing to forage in the field. The residents advised that the Southern end of the field was also used by the Brent geese especially in a strong south westerly gale when the birds benefit from the lee of the

adjacent properties. They also observed that the more general use by the birds at the southern end of the site had in recent years reduced as dog walkers increasingly used this end of the field.

6. **Brent Geese Population Monitoring.** (Att B Question 5). HBC confirmed that the monitoring of the Brent Geese population wintering on Hayling Island was an on-going activity with inputs from official agencies including the Solent Recreation Mitigation Partnership (SRMP). The SRMP strategy includes the impact of the increase in population/recreation activities on wintering birds. Inputs from the public domain were welcomed and included in the Solent Birds data gathering (note iaw Att C para 63(4) “opinions from the general public”). [REDACTED] confirmed that counting/photo evidence on Brent Geese and Waders would be continuing this winter.
7. **HBC Planning Process and Timelines.** (Att B Questions 7 & 8). HBC advised that the decision as to whether to include the Sinah Lane development in the Draft Plan had not been decided. There was no longer a requirement to monitor the ratio of building on greenfield/brownfield sites (approx. 2/3rds to 1/3rd respectively), so no targets are set. Government building guidelines are treated as a starting point – a minimum rate. The HB Cabinet had until 30 January 2019 to forward the Draft Plan to HB Council. If the subject development was not included then Barratts could still appeal. If the plan was included then the HBC would comment (6-8 weeks) and pass it on to the Development Management Committee for implementation. There would be opportunities for the general public to appeal/comment during the planning decision process as promulgated in HBC Planning announcements.
8. **Public Right of Appeal.** (Att B Question 9). HBC confirmed that the public had the right to appeal against any decision made at local government level. HBC suggested that advice could be obtained from the Ombudsman as a starting point but warned that any case would need to be solid to be considered. Any formal appeal would have to be done legally and within 6 weeks of the decision date. This would be costly but [REDACTED] commented that he believed that there was enough strong feeling on the island to crowd fund a judicial appeal if it became necessary.
9. **Access to Site H34C.** (Att B Question 10). The Sinah Lane residents who all live close to the only access to the proposed development expressed concern about the issues of site lines, safety of road users especially in low sun conditions further evidenced by a recent car accident (not reported to the police, therefore not a statistic, but recorded by [REDACTED] at Att D), parking on the road, and pedestrians crossing the site access road and at the bottom of the HBT. **HBC advised that they would pass on the concerns to the relevant Highways authorities.** The residents agreed to supply documentary evidence to support the above concerns.

Attachments:

- A. Comments by [REDACTED] on “Oysters” and Barratts Planning Application – Environmental issues. E-mail to Councillor Issy Scott dated 18 September 2018

RECORD OF MEETING WITH HBC PLANNING DEPT – 14 NOVEMBER 2018

- B. Questions proposed by Sinah Lane Resident attendees to HBC Planning
- C. EU directive on “The Conservation of Habitats & Species Regulations 2017”
- D. Notes by [REDACTED] on the Car Accident on Sinah Lane on 9 October 2018.

Distribution:

Attendees plus Councillor Issy Scott

[REDACTED]

Draft 1 dated 15/11/18



17 October 2013

Land off Station Road,
Hayling Island

Brent Goose Mitigation
Strategy - ADDENDUM

Report Number: 1435_2011_R04a_JA_RW

Author: Julian Arthur MCIEEM CENV

Checked by: Laura Sanderson MCIEEM CENV

Contents

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Appendix

Appendix1: RSPB letter dated 7 October 2013

Plan

Area of Brent Goose Habitat likely to be Improved by Access Management
1435/P03 October 2013 JSA/JTF

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Land off Station Road, Hayling Island
Brent Goose Mitigation Strategy

1435_2011_R04a 17 October 2013 JA_RW

Section 1: Introduction

- 1.1 This report has been prepared by Tyler Grange LLP on behalf of Hayling Island Builders Ltd in respect of Land off Station Road, Hayling Island, Havant ('the site'). It is an addendum to a mitigation strategy agreed with Natural England and Hampshire County Council to compensate for loss of Brent goose foraging habitat to ensure there is no impact to the integrity of the SPA and Ramsar as a result of proposed development of the site (Tyler Grange report ref. 1435_R03b; hereafter referred to as 'the strategy').
- 1.2 This addendum has been prepared to address concerns raised by the RSPB in its letter dated 7th October 2013 (**Appendix 1**) in respect of the strategy. The RSPB states the strategy is modified as follows (excerpt from letter in **Appendix 1**):
- *"A minimum area of 2.5ha replacement feeding habitat to be secured on open, flat land, as close as possible to the H34 network of Brent goose and wader feeding sites.*
 - *The replacement habitat to be planted with either winter cereal, oilseed rape or permanent improved grassland, to ensure that it provides a suitable replacement resource for Brent geese and waders on an annual basis.*
 - *The replacement habitat to be in place before construction of the proposed development, and managed as such in perpetuity.*
 - *Measures put in place to limit informal recreational access to the network of H34 Brent goose and wader feeding sites.*
 - *Monitoring carried out of the replacement habitat for a minimum period of 3 years, with a requirement in place for the applicant to undertake further reasonable mitigation measures should the replacement habitat prove unsuccessful."*
- 1.3 Each of the RSPB's points is considered below. This addendum should be read in conjunction with the strategy.

Area of Replacement Habitat

- 1.4 The area of H34E that would be removed from the foraging resource for Brent geese is 2.5ha (i.e. the area of the development footprint). The strategy states that 1.5ha of land at H34E would be made more suitable for Brent geese to compensate for these losses. This does not compensate like-for-like in terms of area.
- 1.5 However, in addition, existing recreational use of H34C to the west (also used by Brent geese) will be reduced by blocking off uncontrolled points of access to H34C along its eastern boundary with the Billy Trail. The informal footpath on the western boundary of H34C adjacent to Langstone Harbour is outside of the developer's control and hence would not be affected (anecdotal evidence from surveys suggests that this path is well used, and use results in birds in the northern part of H34C being flushed to the harbour). This will increase the area of habitat that is suitable for Brent geese to forage.
- 1.6 As a crude estimate of the area that is likely to be improved for Brent geese it is necessary to consider the likely area that would remain affected alongside the path next to the harbour.



- 1.7 The Solent Disturbance and Mitigation Project (Ref. 1) refers to data obtained by Liley *et al.* 2010 (Ref. 2) in respect of the behavioural responses of both waders and Brent Geese to disturbance from visitors. These responses were “*measured in intertidal habitats, and so do not measure the response of Brent Geese in the full range of habitats they exploit*” (pg. 57). The report goes on to state that “*Brent Geese may be more habituated to disturbance in terrestrial habitats and so have shorter disturbance distances than in intertidal habitats*”.
- 1.8 In the absence of better predictors, the data from intertidal studies has been used to approximate the area that might be improved by preventing access from the Billy Trail. The median distance of 51.5m where disturbance occurred to Brent goose as a result of visitor use (Ref. 1; table 6.1) was used to calculate the likely area that would be more attractive to Brent geese after modifications to prevent access; the greatest distance where disturbance occurred (178m) was used to estimate the ‘worst case’ (this was also considered, in accordance with the precautionary principle introduced by the Habitats Directive for protected sites). In reality, the area of H34C that would be more attractive to Brent geese is likely to be somewhere in between the two since the mid part of the field is relatively narrow and may be less used than more open parts. There may well be other factors that influence the pattern of use. Table 1 and **Plan 1435/P03** set out the areas.

	Distance where disturbance* occurred used to calculate area (m)	Area (ha)
Total area of H34C	-	11.8
Likely area made more attractive	51.5	9.4
Minimum area made more attractive	178	5.8

Table 1: Area of H34C likely to be made more attractive to Brent geese following access restrictions. *distances taken from Liley *et al* 2010

- 1.9 Of course, it is not possible to state quantitatively what the benefit of this approach will have in terms of compensation for habitat lost. But when considered together, it is concluded that the enhancement of 1.5ha of H34D together with access management in H34C to make at least 5.8ha of the field more attractive to Brent geese is likely to compensate for losses of 2.5ha of H34E. Natural England and Hampshire County Council’s ecologist agreed with this conclusion.

Treatment of Replacement Habitat

- 1.10 Table 2 below sets out the cropping regime since 1999 in H34C and E. Contrary to what was stated in the strategy, information from the tenant farmer has confirmed the fields are not on rotation of cereals and legumes on alternate years. Winter wheat (which is a known forage crop; Ref. 3) is grown biennially, with alternate years either rape (another forage crop), linseed, soya or peas. Since 1999 the fields have not supported crops known to be used by Brents in only four

winters (circa 25% of winters). The situation is therefore considerably (25%) better than previously thought.

- 1.11 The farmer chooses crops based on market forces. It is not reasonable to require him to grow only those crops suitable for Brent geese, indeed Natural England and Hampshire County Council's ecologist agreed that this was not necessary.

Year	Crop	Year	Crop
1999	Rape	2007	Peas
2000	Wheat	2008	Wheat
2001	Soya	2009	Linseed
2002	Wheat	2010	Wheat
2003	Rape	2011	Rape
2004	Wheat	2012	Wheat
2005	Rape	2013	Peas
2006	Wheat		

Table 2: Crop rotation at H34C and E since 1999 (data provided by Simon Walter). Crops in bold are of known value to foraging Brent geese (Ref. 3)

Timing of Provision

- 1.12 It was agreed with Natural England and Hampshire County Council's ecologist that provision of compensatory habitat and recreation management was not required until such time as impacts were likely, with the objective to ensure that there is no net loss in availability of winter foraging.
- 1.13 Based on what was known, the strategy stated that provision would be before winter 2015/16 when the next winter wheat crop was sewn. However, given the crop rotation in Table 2, the timing of the next suitable forage crop (and the fact the birds may use stubble in other years) may well be sooner, hence provision should instead be made before winter 2014/15.
- 1.14 The heads of terms of the management and monitoring plan in the strategy have been modified accordingly in Table 3 below.

Limit Informal Recreational Access

- 1.15 RSPB was concerned that recreational access might be possible from the new development on to the remaining part of H34E to the north of the development. However, the development plans show no access to H34E from the development site. H34E is not currently used for recreational use (unlike H34C, there is no obvious destination from accessible locations around the field), and it is therefore not likely that there would be use of this field – and hence disturbance to birds – once constructed.

Monitoring

- 1.16 It was agreed with Natural England and Hampshire County Council's ecologist that if monitoring in the first three years post construction confirmed that Brent geese were using H34E in equivalent numbers, and H34C in greater numbers (i.e. that the mitigation strategy is successful), then monitoring need not continue for three seasons. However, if this was not the case then three seasons of survey would be undertaken.
- 1.17 RSPB considered that there should be "*a requirement in place for the applicant to undertake further reasonable mitigation measures should the replacement habitat prove unsuccessful*". This point was discussed with Natural England and Hampshire County Council's ecologist at a meeting prior to production of the strategy. It was concluded that there were many variables that could not be controlled by the developer that could influence the use of the site (patterns of usage of fields on around the SPA; population fluctuations; etc) such that it was not reasonable to impose such a condition on the developer. Instead, it was agreed that since there was a high likelihood of success, and that – as with other similar schemes around the SPA – the monitoring data could be used to better understand what measures are successful, rather than to require the mitigation measures to be modified by the developer in some way.
- 1.18 As stated in the strategy, a full management and monitoring strategy (modified heads of terms in Table 3) would be controlled by planning condition, with its implementation secured in perpetuity by planning obligation.

Objective	Prescription	Timing	Responsibility
Ensure H34D is farmed in such a way that it supports suitable habitat for foraging geese and waders	Farm H34D on same rotation as H34E and H34C, with cereals in alternate years, and other crops that may be suited to foraging geese at other times.	In line with usual farming practice	Farmer
Maintain clear, open sight lines between H34D and H34E	Vegetation along the retained ditch cut/ploughed annually to ground level in autumn.	By September 2014*, then annually in September	Farmer
Control access from Hayling Billy trail into H34C	Install fencing to block existing desire lines.	By September 2014*	Developer
	Ensure paths are not recreated, which would increase disturbance to birds. The fence should therefore be checked annually in autumn, before geese arrive, and if necessary repaired.	Annually in September	Developer
Monitor efficacy of mitigation	Undertake up to three winters of monitoring surveys post completion of mitigation and only in years where winter wheat present; if numbers equivalent or greater in year 1 or 2 then stop monitoring.	October to March; 2 visits per month	Developer/ecologist

*Assuming development commences in 2014, otherwise in September following commencement of development

Table 3: Modified heads of terms of management and monitoring plan



Section 2: References

- 1 R. A. Stillman, A. D. West, R. T. Clarke & D. Liley (February 2012) Solent Disturbance and Mitigation Project Phase II - Predicting the impact of human disturbance on overwintering birds in the Solent
- 2 Liley, D., Stillman, R. A. & Fearnley, H. 2010. *The Solent Disturbance and Mitigation Project: results of disturbance fieldwork 2009/10*. Report to the Solent Forum
- 3 Rowell, H.E. & Robinson, J.A. 2005. *Identifying and characterising the feeding areas of Dark-bellied Brent Geese Branta bernicla bernicla in and around Special Protection Areas in the UK. Waterbirds around the world*. Eds. G.C. Boere, C.A. Galbraith & D.A. Stroud. The Stationery Office, Edinburgh, UK. pp. 517-518.



Appendix 1: RSPB letter dated 7 October 2013



Daphney Haywood
Havant Borough Council

By Email only: Daphney.Haywood@havant.gov.uk

7 October 2013

Dear Mrs Haywood

Proposal: Outline planning permission for mixed-use development comprising up to 60 dwellings and 1,250sqm of light-industrial accommodation (Use Class B1)

Location: Land north of Station Road/East of Furniss Way, West Town, Hayling Island

Ref: APP/13/00639

Many thanks for consulting the RSPB on the further information submitted in respect of the above application. We welcome the applicant's new Brent Goose and Wader Mitigation Strategy (herein referred to as 'the Strategy'), but we do have a number of concerns regarding its recommendations.

The Strategy acknowledges the importance of the application site to wintering brent geese and (to a lesser degree) waders, following evidence of local observations highlighted in our previous response. Accordingly, the Strategy makes a number of recommendations to mitigate the loss of an estimated 2.5ha of feeding resource by undertaking the following measures:

- Farm H34D (currently a 1.5ha grass paddock) on same rotation as H34E and H34C, with cereals in alternate years
- Maintain clear, open sight lines between H34D and H34E
- Control access from Hayling Billy Trail into H34C
- Monitor efficacy of mitigation for up to 3 (alternate) years
- Implement the management and monitoring plan in perpetuity

The stated objective of these measures is to ensure that there is no net loss in winter foraging resource. However, we are concerned that the above may not be successful in achieving that objective, for the reasons set out below.

The Strategy suggests that the farmland within H34E is currently managed on a rotation, meaning that it is only suitable for winter foraging in alternate winters (when a winter wheat crop is present). It is proposed that the replacement habitat (H34D) will be managed in the same way. However, this information is inconsistent with the reports we have received from a neighbouring landowner, whose observations suggest that this last winter (2012/13) was the first in the last 19 years that that brent geese have been absent from the site. If rotational farming of H34E is a relatively new introduction to this land, then this

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means that there will already be a 50% reduction in available foraging resource, based simply on the current management regime.

Further, while the area of foraging habitat lost as a result of the development is calculated as 2.5ha, no assessment appears to have been made of the impacts on adjacent land which may be subject to disturbance from the development, deterring wintering birds from using a further area of land. The ditch bisecting the remaining area of H34E may also mean that geese in particular avoid the remaining southern area of field, as it may be perceived as being too small/enclosed. Nevertheless, even on the basis of a conservative estimate of 2.5ha of lost foraging resource, it is clear that the replacement habitat will be smaller than that lost by the footprint of the development. No explanation is offered in the Strategy as to why this smaller area might be sufficient to support the same number of geese as the area lost.

The relatively narrow shape of the replacement habitat also creates uncertainties in its attractiveness to brent geese, which the Strategy acknowledges prefer large open sites. The improved connectivity between the remaining arable land within H34E and that of H34D may help counteract the narrow shape, but it will not be apparent how attractive this area is until the mitigation works have been undertaken. According to the Strategy, these measures will not be put in place until after the development has been constructed, leaving little opportunity to alter the measures and ensure continuity of feeding resource if they prove unsuccessful.

The proposed control of informal access to the adjacent field (H34C) is a welcome additional measure, however it is not clear how much this will reduce disturbance to brent geese and waders using that site, given that access will still be possible along the north and eastern boundaries of the site. It is also unclear whether this measure is seen as compensating for the smaller area of replacement habitat and if so to what extent.

Therefore, in order to provide greater confidence that there will be no net loss of wintering bird feeding resource as a result of the proposals, we consider that the following measures are required:

- A minimum area of 2.5ha replacement feeding habitat to be secured on open, flat land, as close as possible to the H34 network of brent goose and wader feeding sites.
- The replacement habitat to be planted with either winter cereal, oilseed rape or permanent improved grassland, to ensure that it provides a suitable replacement resource for brent geese and waders on an annual basis.
- The replacement habitat to be in place before construction of the proposed development, and managed as such in perpetuity.
- Measures put in place to limit informal recreational access to the network of H34 brent goose and wader feeding sites.
- Monitoring carried out of the replacement habitat for a minimum period of 3 years, with a requirement in place for the applicant to undertake further reasonable mitigation measures should the replacement habitat prove unsuccessful.

I hope these further comments are helpful. Please do not hesitate to get in touch should you wish to discuss any of the points we have raised in further detail.

incerely

Carrie Temple
Senior Conservation Officer
Email: carrie.temple@rspb.org.uk
Direct dial: 01273 763605

Plan

Area of Brent Goose Habitat likely to be Improved by Access Management
1435/P03 October 2013 JSA/JTF



Land off Station Road, Hayling Island
Brent Goose Mitigation Strategy

1435_2011_R04a 17 October 2013 JA_RW



Informal footpath - no changes proposed. When in use this is likely to disturb geese within circa 50m; worst case , up to 178m

LANGSTONE HARBOUR SSSI

Mud

Jetty

Jetty

Jetty

Jetties

Hayling Billy Trail

BMX Track

Newtown

Pumping Station

WOODLANDS L

SALT MARSH LANE

SI

ATHERLEY

MEAD

NEWTOWN L

MANOR ROAD

AUBREY CLOSE

HAMFIELD DR

DANCES WAY

STATION ROAD

SINAH LANE

PARK ROAD



Site Boundary



Fence Repairs (approximate locations)



Minimum Area likely to be enhanced (5.8 ha)



Maximum Area that may be enhanced (9.4 ha)



Area unlikely to be used when path in use owing to size and enclosed nature (0.7 ha)



Existing Informal Path

Uncontrolled access to F4 from Billy Trail prevented to reduce disturbance to birds



0 50 100 150 200m

Project Details

Land between Furniss Way and Dancers Way, Hayling Island

Title

Area of Brent Goose Habitat likely to be Improved by Access Management

Scale

As Shown

Drawing Ref

1435/P03

Date

October 2013

Checked

JSA/JTF



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[REDACTED]
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9TH February 2021

Planning Inspectorate
Temple Quay
Bristol
For the attention of Milena Opolska

Dear Madam

Re: Appeal APP/X1735/W/20/3253633. Erection of 195 dwellings North of Sinah Lane Hayling Island.

Firstly, we would like to highlight that Barratt Homes (BDWH) have adopted a twin track planning application in an attempt to intimidate and influence the Havant Borough Council DMC into shortcutting the planning process. This frivolous second application undermines the role of the Planning Inspectorate, is a waste of tax payers money and is overburdening local government planning department resource.

We are also most concerned that this new application (which has attracted over 500 objections in 3 weeks) doesn't divert consideration of the previous 500 plus objections to this development already submitted by local residents and organisations.

Throughout the consultation process HBC planning team have played down in their reporting to councillors and committees on the challenges set as a condition of acceptance of this development by key stake holders such as Chichester Harbour Conservancy, Langstone Harbour Board, Southern Water and RSPB. The reality is that many of the conditions set by these organisations are unachievable but HBC ploughs on regardless.

It is clear that the overriding view in the HBC planning team is that they want to get this application 'over the line at any cost' and any deficiencies/cut corners due to lack of oversight become a 'Fait Accompli' which can be resolved or brushed under the carpet, after approval is given.

This letter highlights a number of general concerns relating to the development and in addition specific failures and misinformation within the BDWH submission.

Traffic/Transport

The BDWH submission data has indicated that this development will add in the region of 1000 additional car journeys per day into an already crowded Hayling Island (HI) road network. Many of these journeys are commutes off island because there is no provision for island jobs in the proposal. This additional traffic will exacerbate the regular gridlock on the A3023. We all know that the mitigation funding offered by BDWH alongside this development is inadequate (less than 5% of what is needed for the minimum benefit) and will not make a dent in the island's traffic problem but if redirected to improved cycle routes and public transport it could actually make a meaningful difference. That said this option has been ignored by HBC, who remain obsessed with encouraging more motor vehicle traffic through the Hayling Bridge choke point.

What lockdown has taught us all is that what the Island needs is an alternative Dutch style commuting route strategy with dedicated off island cycle lanes and proper investment in the Billy Trail. It is central Government Policy to create a carbon neutral future but the HBC strategist seems to be stuck in the past where the car is king.

Surely every penny of traffic mitigation funding should be directed towards reducing carbon emissions. Why is this not policy in the current borough draft plan?

100 year rule.

The proposed development area is adjacent to the fast eroding shoreline of Langstone Harbour SSA and HBC have documented that they have no interest in funding more coastal protection in this area. BDWH wanting to limit their liability have been very silent on the issue and have also been silent on the fact that commercial organisations such as Southern Water understandably do not want to pick up the future liabilities associated with flood risk and SUDS as they relate to this development. The planning requirement for the development and refuge (as a primary support area for Brent Geese) to be viable for at least 100 years has not been met.

Flawed protected species refuge mitigation and inaccurate net gain bio diversity claim by BDWH and their consultants WYG.

The net gain biodiversity is a legal requirement that the developer must comply with and HBC must then check and enforce. Neither the original application (00724) or this new one (01093) meet this requirement. The strategy by both BDWH and HBC planners has been to deflect and confuse the issues to date in the hope that shortcomings in the proposal will be overlooked by those we appoint to question the efficacy of the developers proposal and mitigation solutions offered.

The developers consultant WYG are stating that the refuge area can support considerably more than the 400 plus Geese that currently use the field once it is designated as a core site. BDWH have effectively used this same strategy in the past to justify the Oysters development effectively double counting the same land in mitigation whilst in reality significantly reducing the available space for birds to roost and forage.

In addition the County Ecology team under pressure from HBC have recently rewritten again the rules about displacing protected birds by removing the requirement to mitigate the loss of foraging land in another area of equal or larger size. This has been waived because they could not find the land to meet this mitigation requirement. Surely Hampshire County council and Havant Borough

Council should be required to find the equivalent land areas for Brent Geese to forage and if this is not possible remove the certified primary sites as land for potential building development.

The proposed refuge is at its widest 250 metres across and the geese currently congregate in the centre of the field only which is no surprise as it is well documented that the foraging flock want to see threats such as foxes or dogs coming. The Geese grazing pattern of every field frequented by Brent Geese on the Island has a 50 metre perimeter of untouched grazing land. Therefore much of the area of the refuge is too close to the boundary to give suitable sight lines. It is clear that the fixed topography of the field will limit greater use by migratory Geese in future and this supposed increases underpins the net gain bio diversity the developer has stated they will achieve. If anything the 'enhancement' to 'improved grassland' offered by the developer will reduce sightlines and may decrease Geese population. BDWH are clearly clutching at straws in the net gain bio diversity claim and hoping that the proposals oversight through the council will be too cursory to spot the deficiency.

If we look at the history of other Brent Geese mitigations offered by this developer on the island then their past behaviour raises concern that they will even bother to any commitments unless accompanied by clear oversight and certainly before they try and pass off the liability to a residents management committee.

In 2014 the section 106 agreement between HBC and BDWH relating to the Oysters Development stated:

- 1.The loss of habitat as a result of the Oysters development could be mitigated by encouraging additional birds onto an enhanced field H34C by preventing loose dogs and walkers access the area thereby preventing them disturbing the foraging birds. The same Tyler Grange report also stated that foraging birds were disturbed when approached from approx. 50 metres to 110 meters.
- 2.BDWH would install fencing to block existing desire lines between the Billy Trail and all of field H34C. N.B. *This fence needed to be a complete approx. 400 metre livestock style fence to be effective. This is the same fence the developer has offered to surround the new refuge.*
- 3.BDWH would check that annually, in the autumn, that the fence was intact and make necessary repairs.
- 4.BDWH would undertake monitoring for 3 winters of the Dark Bellied Brent Geese population in the field H34C when winter wheat was planted to confirm that the actions taken by them to secure the boundary were effective.

It has subsequently been proven that Barrett homes ignored the requirement of the Oysters 106 agreement and took none of the agreed actions.

In a meeting with the HBC planning team in November 2018 they confirmed that BDWH had failed to comply and also HBC failed to enforce any of these required actions. At that time HBC committed to take this up with BDWH to ensure they rectified the situation.

At time of writing the Hayling Billy trail boundary with field H34 is still fully porous and loose dogs regularly disturb the foraging Geese.

It should also be noted that HBC planning team have failed to ever acknowledge in writing the minutes of the meeting with residents where they verbally admitted that Barratt were in breach of contract and committed to doing something about it.

See attachments for more detailed evidence and extracts.

Why is this important?

BDWH and their consultant WYG state in the proposal that the action to secure the Haying Billy boundary was completed. (see the extract below)

As has been proven this statement is incorrect however WYG use this falsehood to then justify both the suitability of the Brent Geese refuge and justify a perceived net gain in biodiversity.

WYG also state that accurate annual Brent Geese surveys were undertaken over 3 years. WYG did fail however to observe that approx. the 400 metres of boundary was not secured as it should have been under the Oysters 106 agreement. Did WYG actually attend or did they just cut and paste from the previous Tyler Grange mitigation document?

Also why did HBC not take into consideration the irreputable fact that the crop rotation on the site for development has been manipulated in recent years (leaving parts of the field fallow) thereby making it impossible for the Oysters 106 agreement on Brent Geese monitoring to be accurately completed?

The only assessment of Brent Geese numbers and views on the design suitability of the refuge being considered seems to have been undertaken solely by the developers consultant WYG. This proposal must be reviewed by appropriate experts who will not benefit from mitigation funding offered so that we can be assured of impartiality.

How can we be confident that HBC is capable of monitoring the many future 106 agreement commitments by the same developer associated with this proposal when there has been an abject failure to do so to date?

Why did HBC not use the leverage associated with this new application by BHWD to enforce the Oysters 106 agreement? Was there concern that it would highlight further the importance of this field to migratory birds. A field the county council ecologist refers to as unremarkable. As a local resident the experience of observing a flock of 500 Brent Geese in the field is far from unremarkable. Also if this site is 'unremarkable' how come HBC have failed to find a field of similar size to mitigate the loss of Brent geese foraging land against?

8.0 Consideration of In-Combination Effects

The main potential for in-combination effects is through recreational disturbance from this and other residential developments. However, the payment of fees as part of the Solent Disturbance and Mitigation Project will mitigate for both alone and in-combination effects. Any other residential developments will likewise pay this sum.

Part of the winter bird mitigation strategy for the nearby residential development at The Oysters was to prevent access to H34C from the Hayling Billy Trail, works which have been completed. Although the proposals seek to develop part of H34C it proposes to retain the larger part as a wader and brent goose refuge. Therefore the measures undertaken in relation to The Oysters will still have a benefit by preventing access from the Billy Trail to the new refuge. This development includes additional measures to prevent access or disturbance from the development and from North Shore Road.

As such it is concluded that although there is a likely significant in-combination effect as a result of recreational disturbance, when taking into account embedded mitigation there will be **no significant effect** on the conservation objectives of the SPA.

The new proposal states that extensive ongoing monitoring will be required (see below) How can we trust HBC to do this considering their past failures to hold the same developer to account.

Monitoring will be required to make sure that the management activities are proceeding and to identify any necessary changes to management to continue achieving the management objective (maintain the mitigation area as a 'core' site for brent geese). It is anticipated that three years of winter bird monitoring will take place followed by annual site visits to monitor management actions.

The new proposal includes a comprehensive bat mitigation document by WYG for the 4 species of bat that forage and transit the site. It is noted that the document focuses in the Hayling Billy boundary and northern hedgerows however fails to observe that the greatest bat activity is at the southern end of the site where the population and activity is greatest. **Large numbers of these protected animals cross the only entrance to the field in transit to feeding areas.** It is inevitable that for safety reasons effective street lighting will be required but perhaps more importantly the 195 houses in the development will add considerable uncontrolled light pollution to the current bat transit routes. Assuming the requirement is to do 'no harm' (or even limited harm) to the existing bat population it is hard to believe that this can be achieved if the develop goes ahead.

Bat Activity Surveys	24 th October 2016 – 13 th June 2017	At least four, but up to six species of bat were recorded using the habitats across the site. The site is considered to be of importance at up to District level for foraging and commuting bats.
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It should be noted that WYG do still acknowledge that they do not have the answer to the bat problem even although the development is in the final stages of consideration by HBC under the twin track approach.

Unmitigated removal of linear corridors such as sections of hedgerows and increases in habitat disturbance (through lighting, noise and vibration impacts) during construction and operational phases of a proposed development could indirectly impact bats that use the site to forage and commute.

7.2.2 Mitigation

Bat Activity

The main access into the site will be off the southern boundary which utilises the existing site entrance.

Infill planting of gaps within the hedgerows, in addition to supplementary planting to bolster the hedgerows throughout the site will utilise native species, which will enhance these hedgerow and hence loss of bat commuting/ foraging habitat will not be significant. Further mitigation and compensation for bats is included in the form of native hedgerow planting along the northern boundary of the site. Additional information in relation to hedgerow management is presented in Section 6.2 above.

Lighting

During the construction phase, security lighting will be positioned to avoid direct illumination of retained or created areas of wildlife value. This will ensure that the bats which use the site for commuting foraging will not be significantly disturbed during the construction.

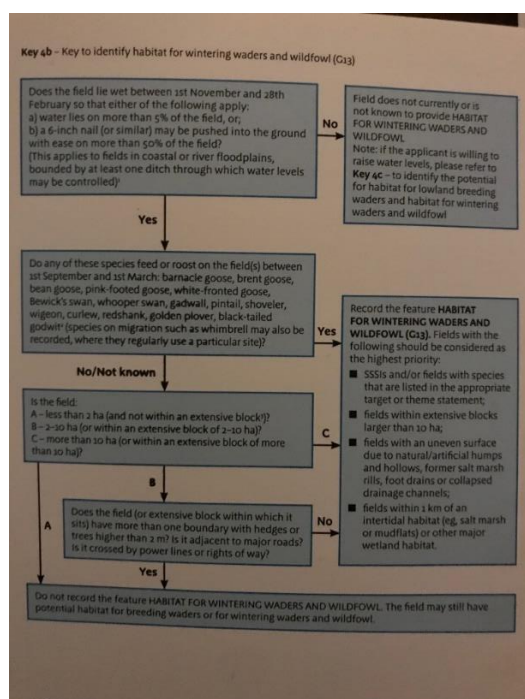
The lighting across the development footprint is to be sensitively designed with consideration for bats, so that valuable bat foraging and commuting areas are retained as existing/new roosts sites are not impacted by ambient light (at the time of writing, the associated lighting plan had not been finalised however it is understood that the lighting plan will show that light levels will not exceed 1 lux within the retained boundaries). Permanent lighting on-site will be minimised in proximity to the following habitats:

Meeting the requirements of G13 in the Farm Environmental Plan Manual

The flagship of meeting the net gain in Biodiversity by BDWH and WYG is detailed in section 4.4. of their proposal. Success for the new refuge is defined as meeting G13 criteria habitat for wintering waders and wildfowl. They anticipate that the criteria will be met. We agree it will be met!

The reason being is that the all of the field already meets this criteria regardless of the attempts of those supporting the development disrupting these protected Geese through their failure to secure the Hayling Billy boundary and by the cynical use of 'creative' crop rotation practices over recent years.

If the HBC planning team have read the extract from the FEP manual (extract below) they would know that the field already meets G13 criteria and should have therefore imposed a more challenging requirements on the developer. The developers consultant has in reality used smoke and mirrors in the assessment to hide a net deficit in bio diversity due to the smaller area of the refuge?



4.4 Improved Grassland

It is proposed that the northern area of the site is converted from arable crop to permanent improved grassland pasture as a wader and brent goose refuge. This grassland will include wader scrapes, however these are not assessed separately as they form part of the condition assessment criteria for the habitat.

Area	6.31ha
Distinctiveness	2 – Improved grassland is assigned low distinctiveness as a default. There is no overriding justification to vary this.
Target Condition	3 – The grassland has been assessed using criteria for G13 – Habitat for wintering waders and wildfowl. High condition is assigned as it is anticipated that all 3 criteria will be met: - Cover of rushes should be less than 40%, and on the remainder the cover of grass or sedge tussocks should be between 5% and 60%; - The sward height should be between 5 cm and 15 cm in November; and - There is standing water on more than 5% of the field and the ground is wet (a 6-inch nail can easily be pushed in) on more than 50% of the field between November and February.
Time to Target Condition	1.4 – Up to 10 years required to create.
Difficulty of Creation	1 – Low difficulty assigned as default. There is no overriding justification to vary this.

WYG have allowed 10 years to create the G13 criteria when the field is already meeting this requirement. There are mountains of research documents which support the fact that Brent Geese preference is to forage on flat arable land adjacent to sheltered waterways where a food source is readily available and sight lines clear.

The WYG proposal will change the character of the refuge to grass land as part of this development but with a potential deficit of 10 years before it is useful in supporting the protected Brent Geese and Wader populations again. They also note they will do more work to secure the Hayling Billy boundary building on the good work done (**actually not done**) by BDWH under the Oysters 106 agreement.

The writer does acknowledge that the new refuge may encourage other animals such as reptiles and rodents but surely the priority is to protect the endangered Dark Bellied Brent Geese and it is clear that this refuge proposal will not offer any net benefits to the migrant geese or wader population.

To achieve a net gain in Biodiversity in their tables WYG have assessed the current field as a low distinctiveness and poor habitat by default. How can an existing primary site for a rare and protected species of goose with around 5% of the world population living around the Solent be considered low distinctive and poor habitat. It is actually already a perfect habitat, meeting all the G13 requirements. The reason for this detrimental scoring is clearly the only way WYG can massage the numbers to meet the net gain biodiversity requirement without allocating additional adjacent land areas (this being a requirement of the Solent Waders policy). It should also be noted that the last time adjacent land enhancement was used as justification e.g. the Oysters, the same developer ignored their responsibilities once planning approval was given.

How can HBC support the habitat distinctiveness and condition assessment by WYG when the field is already a primary site for Brent Geese?

Finally it should be noted that WYG claimed they did extensive hedgerow surveys as part of the net gain bio diversity assessment but again failed to notice that the hedgerows on the Billy Trail are not secure and have a number of tractor wide gaps even although they claim in the same documents this boundary was made secure by their employer Barratt Homes.

5.0 Assessment

Habitats

Existing habitats on site		Habitat distinctiveness		Habitat condition		Habitat Biodiversity Value					
						Habitats to be retained with no change within development		Habitats to be retained and enhanced within development		Habitats to be lost within development	
Habitat description	Habitat area (ha)	Distinctiveness	Score	Condition	Score	Area (ha)	Existing value	Area (ha)	Existing value	Area (ha)	Existing value
		A		B		C	A x B x C = D	E	A x B x E = F	G	A x B x G = H
Arable	12.57	Low	2	Poor	1					12.57	25.14
Semi-improved neutral grassland	0.07	Medium	4	Poor	1					0.07	0.28
Total	12.64									12.64	25.42
Site Habitat Biodiversity Value										25.42	
Habitat Impact Score										25.42	
Proposed habitats on site		Target habitats distinctiveness		Target habitat condition		Time till target condition		Difficulty of creation / restoration		Habitat biodiversity value	
Habitat description	Area (ha)	Distinctiveness	Score	Condition	Score	Time (years)	Score	Difficulty	Score	(N x O x P) / Q / R	
Habitat Creation	N		O		P		Q		R		
Improved grassland	6.31	Low	2	Good	3	10 years	1.4	Low	1	27.04	
Built Environment: Buildings/hardstanding	3.50	none	0	Poor	1	5 years	1.2	Low	1	0.00	
Built Environment: Gardens (lawn and planting)	1.81	Low	2	Poor	1	5 years	1.2	Low	1	3.02	
Wetland: Standing water	0.48	High	6	Moderate	2	5 years	1.2	Medium	1.5	3.20	
Wetland: Acid/neutral flush	0.04	High	6	Poor	1	5 years	1.2	High	3	0.07	
Semi-improved neutral grassland	0.50	Medium	4	Moderate	2	5 years	1.2	Medium	1.5	2.22	
Total	12.64									35.55	
Habitat Mitigation Score										35.55	

With the limited time available this respondent focussed on reviewing the environmental aspects of this latest proposal by BDWH.

In summary – detailed interrogation of just the environmental sections of the Barratt David Wilson Homes proposal identified a number of falsehoods and irregularities.

It is surely not acceptable for the shoddy nature of this submission to go unchallenged by our local council and elected representative.

We understand the desperate need more affordable housing especially for younger people but let us not allow a cynical lack of detail and honesty within the developers proposals to be overlooked in the rush for new housing which will be unaffordable to first time buyers anyway as well as causing irreparable damage to the environment, and increasing traffic congestion. Surely we don't have to build houses in the wrong places just because the land is speculatively offered for development.

We formally object to this planning application and urge you to reject it.

Yours faithfully



The Planning Inspectorate

COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/X1735/W/20/3253633

DETAILS OF THE CASE

Appeal Reference APP/X1735/W/20/3253633

Appeal By BARRATT HOMES

Site Address
Land north of Sinah Lane
Hayling Island
Hampshire
PO11 0HH
Grid Ref Easting: 470824
Grid Ref Northing: 99851

SENDER DETAILS

Name

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence
- ☐ Other

YOUR COMMENTS ON THE CASE

This proposed scheme is inappropriate for a number of reasons. Much of Hayling Island's infrastructure is already fragile, at best, and further development will exacerbate the situation, result in the loss of prime agricultural land and damage the island's value as a tourist destination. The proposal to turn the land to the north of the site into a nature reserve is laudable but would be inadequate compensation for what will be lost and is unlikely to be successful alongside so many dwellings.

A serious concern is the poor drainage of the proposed area. It floods after rainfall, the water table is close to the surface and building there can only serve to increase pressure on already inadequate and badly managed water and sewerage systems. The additional pressure of nearly 200 new homes can only increase risk. The proposed surface water drainage solution will impose an additional unwelcome cost burden on new and existing residents.

Hayling Island is, effectively, a five mile long cul-de-sac with a single access road and traffic has greatly increased in recent years. Even a single cyclist or parked vehicle can result in lengthy queues on much of the A3023 and the "improvements" proposed as a result of the deeply flawed traffic survey are ill-conceived and unlikely to be affordable. The risk of an incident on the bridge preventing access for emergency vehicles has not been addressed. The news that the bridge will soon require maintenance should serve as a warning not to put further pressure on this vital artery and, particularly, to reduce usage by the sort of heavy vehicles that this development would require during build.

Measures to deal with the volume of site traffic during build have not been addressed. The passage of heavy lorries through West Town will be an accident waiting to happen and no allowance seems to have been made for parking contractors and workers' vehicles. Imposing this on already congested Station Road and the limited facilities in West Town is completely unrealistic. The growth in on-line order deliveries has been significant and will continue to increase. The addition of the proposed housing will fuel this. The occupants will be unlikely to find jobs on the island so traffic flows in that area will continue to surge. The proposed single access onto Sinah Lane will put more pressure on the West Town area where the narrow pavement on the north side of Station Road is totally inadequate and a blind bend renders crossing potentially dangerous.

Hayling Island has a unique set of infrastructure constraints and, in 2013, the Inspectorate took the view that growth on the island should be limited to take account of the risk of flooding, the need to minimise impact on Chichester and Langstone Harbours and the access difficulties on the local road network. To that must be added the existing pressures on the limited infrastructure, including medical and educational facilities, together with minimal employment opportunities on the island. This application has attracted 500 to 1 condemnation from local residents. I believe it flies in the face of all of the above concerns and recommend strongly that it should be refused.

The Planning Inspectorate

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YOUR COMMENTS ON THE CASE

Dear Sirs,

I am writing to confirm my original objection to this planning application for the following reasons:

- The council has still not sorted out the infrastructure on the Island to cope with the extra traffic that will be generated.
- There is only one access onto the Island and I believe that the bridge will need some serious work done on it soon. Probably sooner with the extra heavy traffic that this development will generate. As well as all the other developments that are taking place i.e. infilling of the larger properties.
- The field has been flooded the whole of this winter and is still flooded. The farmer has had to put in drainage ditches across the field
- The foreshore on the west side of the proposed site is being eroded and I am not aware that that any provision has been made to protect this. According to the Governments Flood Map for Planning this foreshore is marked for flooding.

This development should not go ahead. It is not appropriate for this small Island