

SAVE OUR ISLAND OBJECTION TO APP/20/01093

Erection of 195No. dwellings, associated open space, pumping station, sub-station and formation of new vehicular access off Sinah Lane. Change of use of land from agricultural to a Wader and Brent Geese Refuge Area (Resubmission of APP/18/00724)

In 2013, the Inspector commented on the Local Plan saying:

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

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

This statement remains just as true today.

It would be wrong of us not to recognise the weight of pressure on HBC to build more and more houses. Havant Town, like many in the country, is struggling with regeneration. Many retail outlets are being boarded up, with shopfronts painted to hide the desolation within. HBC are now beginning to buy up town centre properties for redevelopment, but trying to corral the many absentee landlords to agree a regeneration strategy must be a bit like herding cats. The first high rise development opportunity has not received any developer interest at the time of writing.

There are also many opportunities for sustainable infill in the existing developments, but this, of course, requires much more work from HBC and developers to achieve.

On Hayling Island, windfall has always been the major development category, including assisted-living complexes and affordable housing. These will continue, together with the proposed Seafront regeneration projects.

However, we question the validity of allocating large tracts of profitable farmland to the big developers to construct out-of-context high-density housing dormitories, constructed on legal minimums and ignoring Government recommendations, i.e. mature tree planting, low-cost energy systems, electric car charging for all.

The dormitories add additional strain on the already stressed Hayling Island infrastructure, including roads, schools, primary care and emergency services – with little or no benefit being added to the Island's economy.

We do understand the attraction of this kind of development, given the massive amounts of cash sloshing around these projects for Councils and developers alike, but this should not be the determining factor in every case.

Since 2013, the net housing increase on Hayling Island, including outstanding applications with planning permission as of April 2020, is 503 units.

In addition, housing allocations in the Local Plan rose from 660 to over 1100.

In 2017 it was agreed – because of the unique issues and constraints impacting the Island – that all infrastructure planning should cover the whole Island. At that time, HBC set up HIIAG to advise on all aspects of the Island's infrastructure. There are no other islands in Britain that share the characteristics and limitations of Hayling.

The Island is serviced by a single-access route. The A3023/bridge route is a single carriageway rated as S2 3rd Class. This is effectively a country lane. In addition, there are no alternate routes, and there are no economic options to expand its capacity. Therefore, it remains as the key infrastructure constraint for the Island.

Hayling Island is a low-lying T-shaped Island approx. 4 miles north to south, and 4 miles east to west across the southern cross of the T, with a Blue Flag Beach the width of the south coast. The population of approx. 17,500 has a high percentage of elderly/retired residents. There is little industry present or proposed, and working age residents must commute daily to their place of work on the mainland. The Island plays a very important environmental role, surrounded as it is by Langstone and Chichester Harbours, internationally recognised for conservation and playing an important role on the

Solent Special Protection Area for protected species of birds, especially Dark Bellied Brent Geese and Waders. There are nature reserves on both sides of the Island and extensive areas of SSSI.

The Island is best characterised as a leisure destination with its 3 marinas, 3 sailing clubs, 3 holiday resorts, 3 golf courses, a tennis club providing 5 different racquet sports, the Hayling Billy Leisure Trail linking cycle routes to Havant, and 2300 mobile (second) homes. The population of the Island is estimated by HBC to increase 25% in the summer months.

In addition, it offers a safe, accessible south-facing Blue Flag bathing beach, fun fair, miniature railway, and is an internationally important windsurfing and kitesurfing centre. At the west end at Langstone Harbour, there are noisy water sport areas for jet skis and water skiing etc. And a very popular element of the national cycle route runs round the Island which is linked to Portsmouth via a foot passenger ferry.

The historic and natural role of the Island is recognised, and HBC have significant plans to improve and expand leisure opportunities for the benefit of the residents of the whole Borough.

Therefore, it came as a surprise when HBC chose to add the dimension of becoming a housing dormitory for the economy of the mainland, placing an even heavier responsibility on HBC to ensure we have a long-term sustainable infrastructure which is understandable to all and covers all aspects of the Island's needs.

There is no denying the need for housing. What we are asking for is that the quantity and type proposed for Hayling Island is both appropriate and sustainable.

It is the HBC Infrastructure Plan, including the Hayling Island Transport Assessment (TA), which in our view remains deficient, and requires a forensic analysis in line with the considered view of the Inspector in 2013.

The TA was initiated in 2017 and sub-contracted to SYSTRA. It was the intention and promise of HBC to include HIIAG (including Hayling Island Councillors) at every stage, including the key areas of parameter-setting and modelling processes, which including modelling education for the HIIAG members. HIIAG and HI Councillors were excluded from this process, despite their many requests. On its completion, the TA was rejected by the full Council, and through the Satchwell Amendment, a TA Addendum was commissioned. Prior to the publication of the Addendum, we presented our concerns to the Council Leader in a letter dated 9.4.18. This project was undertaken by the HBC Planning Group during the following six months. Again, HIIAG and HI Councillors were excluded from this process. On completion, this Addendum was 'called in' for scrutiny by concerned Hayling Island Councillors. The Scrutiny Board concluded there were outstanding issues to be resolved. However, the TA Addendum was signed off as 'complete' with the issues remaining outstanding.

At this Scrutiny Board meeting, the first and only independent review of the TA was presented by Professor Nick Hounsell. He was Professor of Highways and Traffic at Southampton University until 2017, and is an internationally-recognised expert in his field, experienced in consulting at Government level across Europe on major road infrastructure programmes. At this Board meeting, the Professor was given just 2½ minutes to present his findings. In fact, the views of HIIAG members and residents have been limited to 5-minute deputations at Council and Development Management Committee (DMC) meetings. It should be noted that another Road Design Engineer, Tony Higham, was a member of HIIAG from its inception in 2017, and whose contributions over two years were also disregarded.

The reason for excluding HIIAG from the TA process is unknown, and the behaviour of HBC in this matter has not been explained. This action is contrary to the HIIAG Terms of Reference which clearly identify the road networks as falling under the Group's accountability for detailed scrutiny and critiquing.

The most recent statement at a DMC review of the first Local Plan site to be examined on Hayling Island was made by the Planning Policy Manager on 29 October 2020:

"I would obviously highlight that the HITAA was obviously, and the HITAA generally, was some time in development. It is ultimately approved and published by the Borough Council. There was certainly a more unusual route to its approval ultimately for sure but it does represent an approved assessment by the Council. This was also commented on through the application by the Highways Authority which commented that on the basis that the Borough Council is satisfied with the findings of the HITAA that it considered the mitigation suitable."

We strongly contend that the issues identified by the Inspector in 2013 remain unresolved.

- **The 1100 housing units proposal for Hayling Island in the Local Plan does not tell the whole story.**

This 1100 number must be considered the absolute minimum. HBC have stated that it should not be regarded as any kind of ceiling or limit. So, the increase across the Borough between now and 2037 will be higher, as will the growth from 2037 into the future. We also know that the Government are likely to increase the requirement further.

This means that the 1100 housing number and the single measurement point of 2037 are unrealistic and do not represent the most likely picture of the future.

The A3023/bridge complex, as stated, has no expansion options and its flow/ capacity is finite.

The TA in its current form does not present a realistic picture of the future, and further detailed analysis is required, including:

1. A realistic set of traffic growth parameters to cover a range of housing growth from lowest to highest case with a realistic time frame (not the arbitrary 2037 single point) for the lifecycle of the developments. Growth does not stop in 2037.
2. A detailed flow/capacity analysis, based on the above parameters, of the A3023/bridge single-access route to understand what the future holds. This is the only way to understand the impact of traffic growth (housing and leisure traffic) on the single fixed lifeline to the Island.
3. Removal of the numerous actions taken in the modelling process to deliberately minimise the impact of the housing plan, including:
 - The use of a 3-hour peak, not one hour or less
 - The use of neutral days does not reflect the actual peak traffic flows during the summer months. Hayling Island is a very popular holiday destination.

HBC's assessment of the A3023 in the TA is:

"Para 2.8 "Traffic flows on the A3023 can be particularly heavy, not only during peak hours, but in the hours in interpeak and at weekends. During school holiday periods, and particularly in the summer, traffic flows are at their highest and there is often a continuous procession of vehicles during daylight hours making joining or crossing the traffic stream difficult. Access for emergency vehicles can be inhibited by the constrained network at these times. The speed limit on the A3023 varies between 30mph and 40mph."

Para 2.9 "Due to the lack of employment and facilities on the Island, there is a higher than average proportion of off-Island travel to destinations beyond the immediate area. This has the potential to limit the possible gains from modal shift (i.e. to walking and cycling) because typical journey length is longer than would be experienced elsewhere."

Para 2.10 "Any disruption to traffic flow on the A3023 within Langstone, on the bridge, or on Hayling Island, impacts very quickly on other roads in the area due to the traffic sensitive nature of these routes. Should traffic congestion tail back onto the mainline of the A27 trunk road, this leads to the hazard of stationary or slow-moving traffic on a high-speed dual-carriageway, and into Havant town centre, therefore further reducing the resilience of the network, impacting journey reliability and reducing the attractiveness of the area for business investment and regeneration."

We agree with this assessment. These issues result in a 'do nothing' TA assessment of 'severe' impact, supported by the HBC statement:

"The A3023 on Hayling Island is subject to increasing traffic levels due to car ownership and usage by residents, the necessity to access services off the island, together with cumulative development pressures which all add to daily traffic demand. Hayling Island has only one road route on and off the island with 24 hour daily

average traffic flows at Langstone bridge of 26,508 vehicles. As opposed to a 'network' situation the 'one road only' situation for Hayling Island means that any incident and disruption on the A3023 is felt very quickly and can cause a problem that rapidly escalates with no immediate remedy available such as a diversion route. These incidents whilst often minor in themselves (e.g. a broken-down car or a parked delivery vehicle) have a disproportionately large impact on the efficient functioning of the A3023 corridor resulting in long delays, tailbacks into Havant town centre and beyond, and unreliable journey times. Hayling Island is therefore more vulnerable especially in the case of accidents and emergency roadworks which then have a big impact on the corridor and adjoining highway network. Clearly unmitigated additional development has the potential to worsen the situation significantly."

- **Moving on to the mitigation projects which HBC claim reduce the risk to below 'severe.' (Again, we must remember this is based on the minimal growth numbers.)**

We do not believe the mitigation measures proposed do anything to tackle the A3023 situation, even for current traffic, let alone for 2037 traffic, and even worse, 2037 traffic including new development.

The mitigation measures proposed include:

- (i) 4 new junction designs/layouts;
- (ii) New segregated lanes for right turning traffic;
- (iii) New bus lay-bys.

Everything here is focused on the A3023, a clear admission that this is the crucial corridor. Whilst some of these measures may increase capacity on the A3023 locally, others reduce capacity, particularly some of the junction conversions to traffic signals. Crucially, none of the measures can or do address a key bottleneck on the Langstone Bridge/A3023 route.

A feature of micromodels used is that they do not easily provide what is a very useful output to aid interpretation – the ratio of flow to capacity (RFC), sometimes referred to as the V/C ratio. On a road link basis, this indicates how busy the road is; so, for example, a V/C of 0.9 would indicate that traffic is approaching capacity, with a 'spare' capacity of 10%. It is then relatively easy to see how much additional traffic a road could take, perhaps from a proposed development, before being overloaded. Note here that a practical maximum V/C ratio is often set at 0.85 to account for traffic variability, with the knowledge that delays increase exponentially when V/C ratios exceed 1.0.

These periods of extreme congestion can and often do back up traffic on the A27 and in Havant Town Centre.

The A3023 has a permanent counter at the bridge, and the actual traffic data is available 24/7 for at least the past 10 years. We know from this data that the peak flow loading at the bridge (during the TA assessment periods) is approx. 85% (a V/C of .85) with periods of higher summer activity over 100% (V/C 1.0.)

This makes clear that the free capacity is already limited (which probably resulted in the 'do nothing' severe rating) although that is not made clear because the detailed parameters used for the modelling have not been adequately explained.

As the mitigation measures degrade the A3023 performance, there is no proof that the 'severe' rating will be reduced.

As the V/C moves towards 1.0, the traffic status becomes increasingly unpredictable, and at 1.0 and above, exponentially so! At that stage, it probably doesn't matter what mitigation measures are in place.

Hayling Island's geographic location means that all of the emergency and infrastructure services must use the A3023 to service the Island community. These include:

Ambulance; Police; Fire Service; Social Services;
Emergency Maintenance eg Southern Water

This must not be forgotten as the traffic pressure increases.

HBC resistance to engage with HIIAG and undertake the obvious logical and essential flow/capacity study is unsupportable and requires a detailed explanation and justification.

It is the Hayling Island community which will have to live with the decisions made by HBC, and they are entitled to understand and be able to debate the decisions being made on their future.

• The second area of concern is flood risk.
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Hayling Island has an elevation above Mean Sea Level of between approx. 0 and 25 feet (the highest point in the centre of the Island) and experiences south coast erosion and tidal flooding regularly from very high tides and major storms.

The only area which qualifies for Government protection funds is the south east peninsula (Eastoke) where a regular soft shingle replenishment is undertaken. The rest of the Island's coast – part 'hold the line' and part 'no intervention' – do not qualify for any protection funding. Close to 50% of the Island's landmass is classified (in the Environment Agency (EA) 2100 prediction) as Flood Risk Zone 3. This prediction is expected to be revised upwards shortly.

A Hayling Island Coastal Strategy Project by HBC partner Coastal Partners was funded in 2020. This initial project will report in 2022, and only then will we know what the coastal recommendations and options are. At that time, applications for sea defence projects can be prepared for funding.

These requirements and timescales of the Strategy do not form an integral part of the Local Plan and TA, even though the A3023 is routed through three of the Zone 3 Flood Risk areas.

In addition, the low-lying Island suffers regularly from surface water flooding regularly every winter and after heavy rainfall. Surface water drainage is totally dependent on the ancient deep ditch network dug by farmers many, many years ago. This network drains into Langstone and Chichester Harbours through more than 100 one-way valves in the sea walls. These valves are the responsibility of either Southern Water or the EA. However, the ancient ditch network has no strategic oversight, and it is rapidly degrading with the change of land use for commercial development and housing, as the original maintenance, at the discretion of the landowner, is no longer the driving force it was. The proper function of this network is still essential, and as it forms an integral part of all the Sustainable Drainage Systems (SuDS) used on new developments to transport the output from the holding ponds to the sea. Climate change is already adding pressure to this system through increased rainfall. Near the coast, the already high water-table will particularly impact those areas which are already tide locked, with the anticipated EA tidal prediction set to increase 1.4mtrs.

This surface water network issue is not addressed in the Local Plan, which has been the subject of a complaint to HBC by a HIIAG member dated 13 November 2020.

The first Local Plan housing allocation for Hayling Island, which is on a green field and a good grade arable field North of Sinah Lane, is now to be presented to the Inspectorate for Appeal.

This site presents some troubling, and as yet unresolved, issues.

- The land is low-lying and is affected by tide locking, as it is adjacent to Langstone Harbour. This situation means that the already high watertable rises twice a day with subterranean pressure from the sea. This situation will become worse with the EA's tidal prediction for the future. The groundwater level will also rise with more intense and frequent storms due to Climate Change. A full hydrogeological survey is required to study the risks and ensure that the SuDS are sustainable in perpetuity.
We must also recognise that in addition to the EA predicted 1.4mtr tide rise, named storms may well reduce atmospheric pressure down to 950mb, which could easily increase the tide height by an additional .5mtr or more.
- The Sinah Lane site also requires two pumping systems: one for wastewater and one for surface water. These two systems must run 24/7, and cross-pollution is a real risk. A detailed fail/safe design and maintenance process must be established to prevent pollution of the site, the SuDS raised attenuation pond, and the drainage route through to Langstone Harbour – as a result of system failures, or incidences of very high rainfall (which is on the increase.)

- The plan for the site is linked to the provision of a protected bird refuge. It remains to be seen if a high-density housing development of some 480 souls, with its cats and dogs, rests comfortably with the quiet solitude required for wildlife in the adjacent fields.
- An indicative DMC meeting on the Sinah Lane development was held on 29 October 2020. (The application has already been appealed by the developer APP/18/00724.) It is now clear that this meeting was premature and the decision 5-2 in favour was based on incomplete information.
- Further evidence of the unease felt by Hayling Island residents over the lack of attention being paid to their concerns about development on Hayling Island by HBC in a letter sent to Alan Mak MP by the Hayling Island Residents' Association Chair after the DMC meeting on 29 October 2020.
- It is now accepted by Hampshire County Council that there are major surface water issues as described above which require detailed investigation before any decision on solutions can be considered. It should be noted that this consultation required a direct interface between a HIIAG member and Hampshire County Council.

Clearly, the residents should have representation on the consultations involved.

In conclusion, the Save Our Island Group believes that it is premature to vote on this application until the outstanding issues are resolved, and the appropriate strategies are in place:

- ***A flow/capacity analysis of the A3023/Bridge with realistic growth parameters and timescales.***
- ***A Hayling Island Coastal Strategy including ground and surface water flood risks.***
- ***A detailed Sinah Lane flood risk and surface water drainage strategy.***