
Date: 27 February 2022

Mr David Eaves
Case Officer
Havant Borough Council
PO9 2AX

Dear Mr David Eaves:

We object to the current application on material planning grounds as follows.

Planning Policy & Inspectorate Requirements:

History

The NPPF requires a sustainable development plan and HBC removed this site from its Local Plan 2036 until a full and robust 'Infrastructure' review and plan was developed.

3.23 In response to key issues raised through consultation on the Draft Local Plan Housing Statement by a number of stakeholders, the Council has determined that sites on Hayling Island are not appropriate for 'early release' and the site or area specific issues raised should be fully explored through the new Local Plan

3.24 The consultation on the Draft Local Plan Housing Statement highlighted specific infrastructure issues on Hayling Island which will require further investigation before future development can be considered sustainable under the NPPF.

2.1 Havant Borough's Adopted Local Plan (Core Strategy 2011 and Allocations Plan 2014)9 covers the period until 2026 and continues to form the basis for determining planning applications in the Borough.

Local Plan Housing Statement Dec 2016

This site was removed from the Adopted plan and this was endorsed by the Government Inspector Sue Turner less than three years prior to the previous application for this site.

These sites are adjacent to each other and in the same ownership. The Council acknowledges that it had earlier supported the allocation of UE35, but justifies its omission from the Plan on the grounds it would lead to the delivery of too much housing on Hayling Island as well as their classification as being "uncertain" for Brent Geese and waders through Policy DM23.

The landowner has objected to the omission of these sites from the Plan on the grounds that additional housing is needed on Hayling Island and that the classification under Policy DM23 is not supported by robust evidence. However the housing restraint on Hayling Island is justified by evidence and consistent with distribution of housing set out in the CS. The classification of these sites under Policy DM23 is supported by evidence and whilst it does not preclude development, it is a matter that would need to be addressed through further study and potentially through mitigation in any future plans for development.'

Report to Havant Borough Council - An Inspector appointed by the Secretary of State for Communities and Local Government Date: 7th July 2014 clause 74 & 75

Ms Turner concluded in this report clause 35:

It has been argued that the Plan fails to make adequate provision for housing land on Hayling Island. However development on Hayling Island is restricted by accessibility and environmental issues and the

*allocation of sites in this Plan is consistent with the distribution set out in Table 6.1 of the CS. **No evidence has been submitted to justify re-aligning the distribution or increasing the amount of housing allocated on Hayling Island.***

The Councils decision to Refuse 210 home APP/17/00007 13 April 2017 was on **12 counts** (in blue below).

What Has Changed since this Refusal?

It is incredibly frustrating to wade through the latest application to find that in reality – Absolutely Nothing. Apart from, **1** the number of homes has increased from 210 to 300 (from 31dph to the councils minimum requirement in the local plan of 40, yep plain greedy). To be fair the applicant has filled out a few standard format forms and said trust them they can mitigate against anything.

What we feel has changed is that the applicant has seen the council make a poor decision with regard to land North of Sinah Lane granting 195 homes and a mitigation site for Brent Geese on a climate precarious piece of land and they have got greedy. Upping the Number of homes and density.

It must be exponentially more tiresome and costly to the council to wade through the process again. In short all the good reasons for refusal remain and we will try to demonstrate this as follows.

1, It is unsustainable additional residential development.

Inspectors interim finding concluding that: Based on the current evidence we are therefore unable to find the level of proposed development on Hayling Island sound. Consequently, we cannot consider the Plan's spatial strategy to be justified.

Whilst Gladmans planning submission is certainly copious and weighty in terms of volume. It does not comply with HBC's guidance for site-specific Infrastructure Delivery Statement Dec16. In so far as the level of detail included in the IDS should be commensurate with the scale of the Development proposed. There's a lack of details in terms of sustainability and mitigation.

NFFP requires Effective use of land in the need for homes and other uses, whilst safeguarding & improving the environment & ensuring safe & healthy living conditions, favouring previously developed & brownfield land. This application is none of these things but Hayling has rightly supported the council with the McCarthy-Stone Limewood Development of 40 flats in St Mary Road. Large development of Apartments between Hayling Park and West Town. The apartments to the east of Station Road and the park, the former Pullingers site and further redevelopment on the sea front. And in addition to this in excess of 400 dwellings constructed or granted at Goldring, North of Sinah and Station Road on Non urban land. When will the council recognize the value of Hayling Island and the contribution it makes to the Borough and that there has to be a point where this Island is damaged beyond repair!

2, Failure to address Highway Capacity and the single access onto the Island, Flooding, Healthcare, Education and provision of Utilities.

In the Inspectors interim report he questioned the soundness of the plan due to the very real transport issues saying *'It is clear from the evidence that the existing highway network in the area, most notably the A3023, is already congested at regular times during the day. Indeed, the Hayling Island Transport Assessment (HITA) states at Paragraph 2.7: 'Traffic flows on the A3023 can be particularly heavy, not only during peak hours, but also during the hours in between and at weekends. During all 'school holiday periods, and particularly in the summer, traffic flows are at their highest and there is often a continuous procession of vehicles present during daylight hours'.*

In response to the council suggestion to rework the rejected plan the inspector advised.

The additional work (transport modelling for Hayling Island, further consideration of housing delivery, co-operation with neighbours on any unmet need, consideration and justification for reducing the housing requirement in line with Paragraph 11 b) of the National Planning Policy Framework (NPPF) (if relevant)

and further SA work) is substantial and will take time, whether as part of this examination or through revisiting the Regulation 19 stage of the Plan's preparation. But if undertaken through this examination it will inevitably lead to proposed changes to the Plan that are likely to be significant in both number and substance. There are already a significant number of proposed changes to the Plan that the Council has put forward. To add substantially to these would add a significant amount of complexity that we believe would be very difficult for interested parties to follow, could create procedural difficulties and would lead to a complex and potentially lengthy examination. This is particularly the case given the uncertain outcomes of the additional work that is required.

Hayling Island – Transport 13. We note the Council's position in its letter (CR20). We would like to emphasize the need to provide suitable modelling to robustly demonstrate that there would be no severe impacts on the highway network, including the deliverability of any potential mitigation during tourist periods and weekends.

Third response to the Council's pursuance not to withdraw the local plan in favour of the inspector determining it unsound and undeliverable.

18. Appendix 2 to your reply (CR22) sets out a proposed methodology for undertaking the further work needed to ensure that the Plan would not have any unacceptable impact on highway safety, or the residual cumulative impacts on the road network would not be severe during busy weekend or tourist periods.

19. The proposed methodology seeks to model journey times on Hayling Island in a similar manner to that already undertaken, which we consider to be reasonable. Whilst this may well be undertaken under the proposed methodology, we would like to highlight the need to provide specific consideration/modelling for the junctions listed A to F in Figure 4 of the Hayling Island Transport Assessment Addendum, January 2020 (those likely to be most affected) to ensure there would be no severe impacts on these individual junctions, as a result of increased traffic flows associated with busy weekend or tourist period traffic. The results for these individual junctions should be clearly set out in any further work. In addition, if the further work indicates that other individual junctions could be severely affected by increased traffic flows, full results for these should also be clearly set out in the report.

20. The proposed methodology notes it is important to engage with local residents and statutory consultees to agree the selected days and times prior to the additional modelling scenarios being run. We support this approach, but it is important that the worst-case scenario is tested and if that is a certain Wednesday in August 2021 and the August bank holiday weekend in 2021 then this should be modelled. The inspector also recommends modeling includes the Rook Farm access.

- It is our view that to increase demand at Gable Head which has only just managed the impact from the Goldring close development (131 homes). A further development of 300 homes and related cars will go beyond a capacity tipping point. Furthermore it does not induce walking / cycling to the 3 schools in close proximity which will lead to further demand on the highway. Precisely opposite to the desired outcome. The proposed single access point for 300 homes is far from ideal and efforts by the council to explore other options has not been successful. The main run off St Marys Road has a single footpath only, On street parking makes this road dangerous and congested. If a goods vehicle has to set down on the east bound side it is gridlock.

Furthermore the transport network needs to be viable after taking into account climate change and flooding, this and utilities themselves are of serious concern.

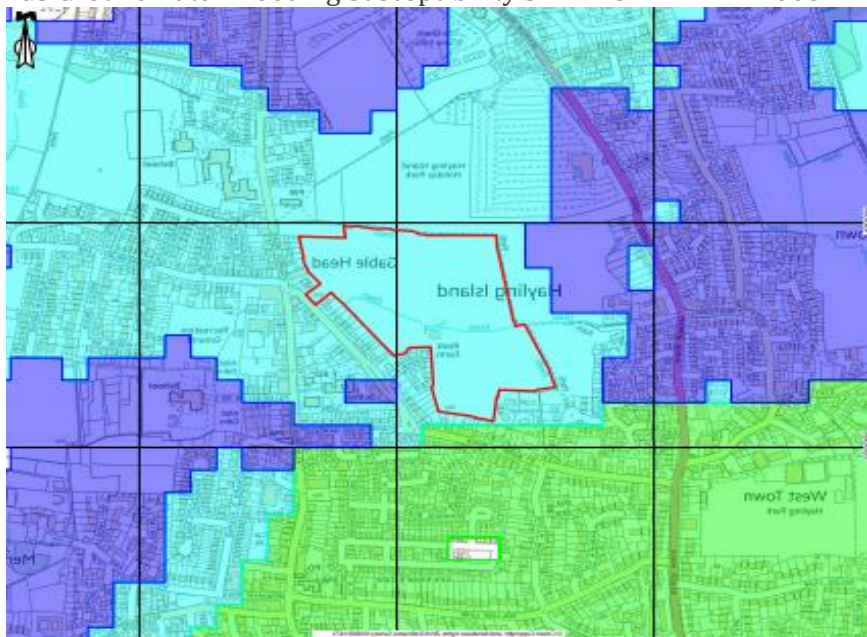
- Gladmans Foul Sewage and Utilities Assessment December 2021

Water - Only a 4" Mains exists and further investigations are underway with Portsmouth Water. So again no positive unequivocal evidence to show the site is developable. Most (those with efficient on demand HW appliances in particular) of Hayling Residence will know the very poor water pressure issues on the Island requiring the majority of us to wait to use a tap if another member of the household are using the water.

Foul Water - Southern Water confirm in their pre-app response that they currently have limited capacity in their network but aim to upgrade within 24 months following the planning decision. Discussions with Southern Water will be progressed after planning is granted. The proposed connection to the public sewer network is via the sewer located in the northeastern corner of the site. **If water efficient appliance are not able to reduce the rate sufficiently discharge locations could be split.** So again confirmation it could go horribly wrong and no evidence that the site is developable. Furthermore is the Service provider who has been fined millions of pounds for discharge proof in our view that there is insufficient capacity for their existing customers. This effects Residence, wildlife and fauna, visitors and sea water quality/safety.

- Flooding (the following is all taken from Gladmans Documentation)

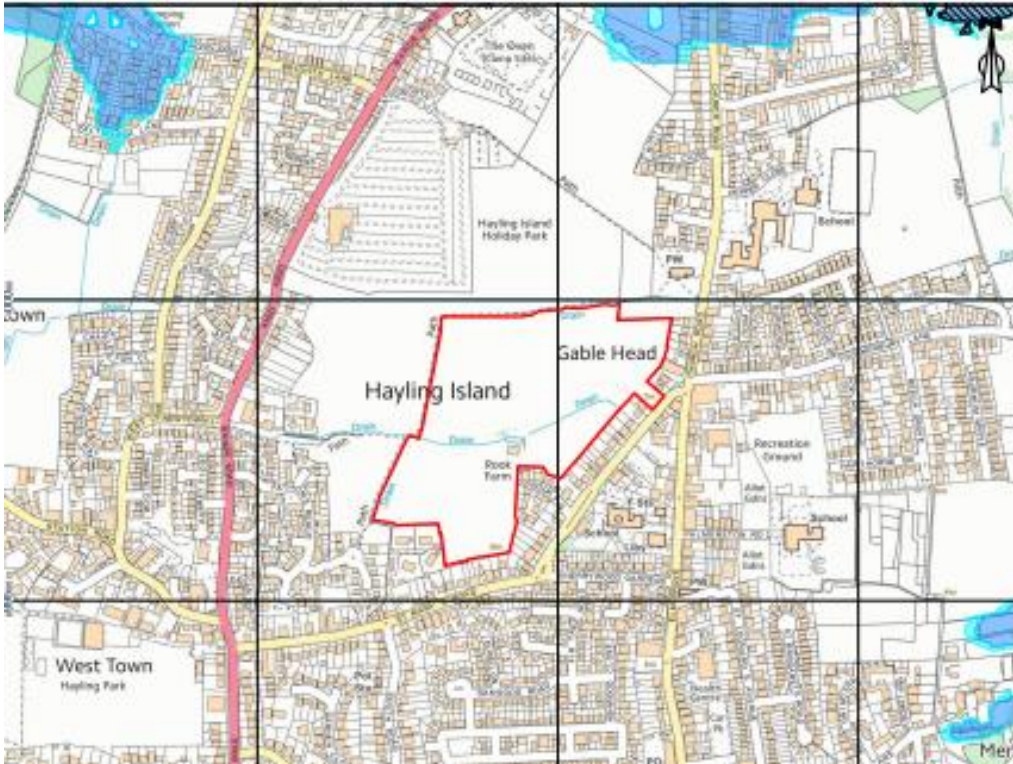
BGS Groundwater Flooding Susceptibility SHF.1132.142.HY.D.003



Dark Blue: Potential for Groundwater Flooding to Occur at Surface

Light Blue : Potential for **Groundwater Flooding of Property** Situated Below Ground Level

This is an alarm assessment but in fact underrepresented, note how very near this illustrated flood presence currently is.



Blue: Zone 3 flooding. Which many experts consider an underestimate, is a site developable if it is cut off from its two possible road routes to Havant Road.



Dark Blue - 30 Year Extent, Lighter Blue - 100 Year Extent

Note specially the surface water highlighted at 49- 53 St Marys Road (lower left corner of the site marked red) We can prove unequivocally that not only are the directions of flow wrong but they are hugely under

represented and misleading. Flooding occurs in the field most years. Given the findings we are concerned that development will exacerbate floods to these properties/gardens.



Image of surface water flooding to field with run off effecting 51-53 St Marys Road (and probably other). image date 5Mar2021

This year it has been limited but last year was bad and the flooding in the road affected front gardens also. Historically there used to be a ditch along the road which has been long since filled in with rejects limiting its effectiveness. Lots of images of previous years flooding available on request, please see previous letter of objection for earlier images. Other locations have not fared so well indeed the Bridge had to be closed on Friday 18th February , 2022.

Gladmans Appendix 2 SFRA Mapping extracts for 2115 clearly shows The whole of the Island is undevelopable and even zone 3 flood map is deeply concerning with great sections of the A3023 flooded in 4 locations.

*Paragraph 159 of the National Planning Policy Framework (NPPF) sets out that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the **development should be made safe for its lifetime without increasing flood risk elsewhere**'.*

- Schools, Healthcare including pharmacies all currently over capacity and unfit for purpose.

3 The proposal, without completion of the appropriate binding arrangements in relation to the Solent Recreation Mitigation Project, is contrary to the Council's Policy on securing the necessary measures required and adopted by the Local Planning Authority.....

A report has been prepared by CSA Environmental on behalf of Gladman Developments. It sets out the findings of an Ecological Impact Assessment (EcIA) of proposed development at Rook Farm and identifies:

Eight international statutory designations within 10km

Three national statutory designations within 3km

Five local statutory designations within 3km of the Site

In fact I believe it is 9 international to include the South Downs National Park which is also a National Statutory with 10k. And 5 local Statutory designations too. Let's think about this for a minute –

this site is encompassed by all these highly prized hugely important designation and supports them. We say Encompassed, the site is in fact right in the centre less than **1 km** away from these sites on **almost every point of the compass**. With Global Warming and Climate change this site owing to its more inland position, sheltered local and generally above flood levels, will only become more important as a place as sea birds and other wildlife can seek shelter, feed, etc.

Whilst this site may appear to be a piece of farm land that is underutilized, it is in fact quite the contrary. Furthermore with the right support it could be such an incredible asset wholly satisfying HPPF 20d which requires 'Sufficient provision for conservation & enhancement of the natural, built & historic environment and measures to address climate change. In short it has the lot.

Gladmans survey is quite detailed and identifies tremendous volume of wildlife but as it is a limited study it is an underrepresentation. More over the approach in my view is fundamentally wrong. It should be analyzing what life could be supported. What if we carefully maintained the water course, and ponds, improved the hedgerows, added to the indigenous tree lines? And supported the Farmer to plant favorable crops for wildlife in collaboration with neighboring farm land, ensured farming avoided the margins, subsidies sacrificial crops or made payments for damaged crops. There was a brilliant Countryfile episode last Sunday (20th Feb) from Halkham Estate highlighting the symbiotic relationship of farming and wildlife and all this potential! Prof. Carl Sayer a Fresh Water Conservation Ecologist who had worked with land owners to recreate and restore some c250 so called ghost ponds bringing back species that where thought extinct but in fact just buried. He confirmed 'a pond is the life of a field really, it's the whole life of the countryside feeding insects into the air creating hotspots for birds and bats and enormous benefits to the countryside.'

We must remember that for over 10 years the tenant farmer has been on notice that he would likely lose the land and therefore is less inclined to manage it.

We draw your attention to further environment governance aimed at Sea Birds.

Department for Environment, Food & Rural Affairs and [Rebecca Pow MP](#) Published 16 January 2020
Environment Minister Rebecca Pow also confirmed a comprehensive Seabird Conservation Strategy, which will be published in December. This will assess the vulnerability of each species in light of the pressures they are facing and will propose actions to address them.

Ms Pow also reiterated the UK's commitment to strengthen protections for marine life impacted by climate change. SPAs form part of the UK's 'Blue Belt' of Marine Protected Areas and join 41 new Marine Conservation Zones designated in May 2019 helping to boost resilience to human-made pressures, as well as providing space to help species to adapt to the impacts of climate change. The UK holds around one quarter of Europe's breeding seabirds, with the marine SPA network said to be of critical conservation importance for many birds and protecting important breeding sites and foraging grounds.

The impacts of climate change are considered to be one of the main causes of a decline in a number of species, mainly through changes to the availability of prey, rising temperatures and extreme weather events.

Ms Pow said: "As the devastating impacts of climate change are only too visible, it is vital that we take decisive steps now that make a real difference to help protect our wildlife and allow vulnerable species to recover. "We have already protected important nesting sites for seabirds, such as the little tern, and these new and additional protections to their feeding grounds, together with the development of a new strategy to protect our seabirds, will help the coastal environment recover, develop and, importantly, thrive.

"Please acknowledge the important role sites less than 800m away from this site perform with regard to the Little and Sandwich tern, and the large number of overwintering species including the black bellied brent goose in their 1000's which this site supports.

4 The development would result in a direct loss of supporting habitat (listed as site H46B of the Solent Waders and Brent Goose Strategy)

Statement of Common Ground Natural England, HBC

Functionally linked land

22. Both Havant Borough Council and Natural England have helped develop, and are fully supportive of, the Solent Waders & Brent Goose Strategy and the accompanying Mitigation Guidelines as a mechanism to ensure the protection of a network of high-quality terrestrial overwintering sites for SPA bird species. Both parties agree that this has informed Policy E17 of the submission plan (CD01) and that the policy overall reflects the approach of the strategy.

24. For the higher-value Primary and Core SWBGS sites it is accepted by both parties that mitigation is possible in principle but must be assessed on a case-by-case basis. This has informed the changes that the Council now propose as part of CD27b which Natural England agree reflect the Solent Waders and Brent Goose Strategy

H27 (Rook Farm) Havant Borough Council accepted and appreciated Natural England's on-going concerns regarding the deliverability of the allocation. Natural England object to the site being allocated due to the uncertainty as to whether an appropriate refuge can be secured that will fully replace the ecological function of the site.

Local Plan. Finding from the inspector

Policy H27 – Rook Farm 34. Rook Farm is proposed as an allocation for 390 dwellings under Policy H27 and is subject to further site-specific guidance under Policy E17 for Solent Waders and Brent Geese. The sites importance relates mainly to Brent Geese. In this regard, it is subject to an outstanding objection from Natural England. The site is identified as a 'core area' and it comprises 'Functionally Linked Land'. In order to mitigate for the loss of the appeal site, it is likely that any replacement site would need to be on Hayling Island. At the time of the hearings, no such replacement site had been secured, despite the scheme first being proposed for development in an outline application that was refused planning permission in 2017 (Ref APP/17/00007).

Solent and Waders Brent Goose Strategy Final Report 2018

Site Classification

• *Core Areas: All sites that were identified as having: o a network value – this relates a site's importance to a network score for birds moving to and from the intertidal areas to inland sites, and between inland sites. This identified two types of site: those that function as 'hubs', with connections to lots of other sites, and those that function as 'bottlenecks, linking two areas of the network together o and/or the max score of 7 in 3 metrics (GB Importance, SPA Importance and SPA Assemblage – see Appendix 1 for details), o and/or sites that have a max count of bird use of 1000 or more.*

*16. Development that would result in impacts to a Core Area will therefore need to be carefully assessed on a case-by-case basis. In order for such developments to demonstrate no adverse effect on the integrity of the SPA(s) then, as a minimum, the full criteria for the replacement of Primary Support Areas (criteria A to I in following section) **must be met along with the following additional requirements:***

• *A suitable replacement site of an equal, or in some circumstances **greater, size and quality must be provided in close enough proximity to the Core Area affected to fully replace its ecological function.***

- *The freehold or long term lease (in perpetuity⁹) of the replacement site must be passed to an appropriate conservation body, or the LPA, in a suitable condition and managed in perpetuity as a nature reserve for waders and / or brent geese.*

Indirect Impact also needs to be considered.

Feeding areas for Dark-bellied Brent Geese *Branta bernicla bernicla* around Special Protection Areas (SPAs) in the UK WWT Research Report March 2004

Identified Chichester and Langstone harbour as having the 2 greatest density of the Geese, coupling it with the other sites in the Solent it becomes the highest population by a large margin.

3 Results - The maps show that for each SPA, inland feeding areas are generally located just outside the SPA boundary.

*3.4.4 Other information provided. Experience suggests that the state of the field is the most important factor governing field choice by Dark-bellied Brent Geese. If there is no crop, or the grass is too long, then the birds will not use the field. If the birds are given a choice of suitable cereal or rape fields, **they will choose traditionally used fields first. Reserve fields are used if the traditional fields are unsuitable**, or have been eaten out, although they will return to the latter if the crop recovers*

*In conclusion this consultation exercise has **highlighted the importance of inland feeding areas** for Dark-bellied Brent Geese outside the SPA suite in the UK; birds had been recorded feeding outside the boundaries of each of the SPAs surveyed.*





Spent shot gun cartridges identified after hearing shots disturbing wintering and other birds, etc. on a number of occasions Tues 24 Nov 2020.

This Year has seen a great number of geese using the field and we have a masses many many photos and videos of this. The Sight and Sounds of these incredible birds is a wonder to behold.

The loss of H34C as a core/primary site plus the fragility (due to erosion and coastal squeeze) of the 'migration site for the Sinah Lane development make this site even more important.'



Current 21st Feb 2022 evidence of the erosion and encroachment of the sea. Not withstanding of course that this site has still not been secured as a refuse anyway.

The current SPA Refuse is not the habitat for geese as it is wetland.



Image dated 21 Feb 2022

Policy Unit 5AH107 p295 confirms a continual loss of European and national conservation designated habitats here. Being non-residential the policy is for 'no active intervention' to protect this land.

Overlaying current flood risk areas with the SWBGS map you will see that there is no suitable further refuse mitigation sites close by and therefore will result in a dramatic and potentially catastrophic net loss of habitat.



5, 6 & 7 Severe impact on road safety and the operation of the local transport network contrary to the NPPF and policy CS20, DM12, DM11 of the Havant Borough Local Plan (Core Strategy) 2011 & 2014.

We have highlighted our concerns above and therefore in the interest of succinctness please refer to the above.

8 The proposed development is therefore contrary to policies CS11 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework along with Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended).

We have also covered this in our objections above. We believe the study is incomplete partly due to the overgrown nature of the current pond, Furthermore there has been disturbance affecting the results. And fundamentally we believe the potential value of the site should be considered rather than a view from its lowest base.

9 The development in the absence of an associated S106 Agreement fails to address financial and other requirements necessary to secure a sustainable development

The developers suggested S106 agreement list is far short of all the element the council previous heightened in its refusal.

10 & 12 Notwithstanding reasons for refusal Nos 1 and 2, the proposed development would not represent an efficient use of greenfield land. This would fail to make the best use of a finite land resource and constitute an unsustainable form of development failing to address housing need in an efficient manner contrary to policies CS9 and CS16 and the NPPF. & 12 The application site constitutes primarily Grade 2 and 3a land which is classed as best and most versatile agricultural land.

In addition to the concerns raised previously we maintain that this site becomes even more valuable as a greenfield given the planning approvals granted on a large number of Greenfield in the borough and furthermore the intrinsic and potential value of the land even its central and safe location. This land has the unique opportunity to support local, National and International ecological objectives, Improve the nation's food resilience, support health and wellbeing, help tourism and economic aspirations and preserve and promote Historic heritage.

11 Harm to the setting of St Marys Church a Grade II* listed building... The impact on an historic asset is irreversible contrary to policies CS11 and CS16 of LP (2011) and DM20 of the HB LP (Allocations) 2014 and the NPPF.

We believe The Developer has failed to address this issue since the previous refusal, the only physical change to the plan is to remove the 3 storey block. The green avenue that tracks from the SW still closes to the previous street scene. However the density of the development has increased by 43% mostly being in close proximity to the Church. This site might be one of the oldest significant sites on the Island and we should reverse not down play its significance. We draw your attention to Gladmans own desk top research

53 Prehistoric finds in the Site

Isolated Prehistoric findspots: Half a Neolithic polished axe of grey flint was found in 1970. Subject to reworking and utilised as a scraper. Bronze Age arrowheads were also found in the same field as the polished axe. Bronze Age hoard comprising two palstaves, socketed chisels, ferrules, broken pieces of spearheads and 50 conical casting jets, alongside several pieces of pottery. Bronze Age vessel from Elm Close, comprising a fragmentary bucket urn. Middle Bronze Age hoard comprising 2 armrings, 1 quoit-headed pin and 27 palstaves. Bronze Age flint barbed and tanged arrowhead.

N.B. The above has had to be deduced as Gladman failed to number the finds beyond location 51 of its Appendix 2: Gazetteer of Hermitage Assets and Previous works. Find 53 & 54 directly relating to the application site.

This to us suggests that this site has been significant from the Stoneage through to the bronzeage, the Church with known origin of the 15th Century being relatively modern! That is amazing, significant and very special.

We thank you so much for reviewing our objections, We would ask you also to see our attached previous Objection to the Application 17/00007 and add this also to this application as it included further evidence and information.

Lastly and on a selfish note we draw attention to Gladmans Impact on existing PropertiesAppendix C Visual Effects Table (VET) which highlights that properties (12no) on St Marys Road to the South of the development will have Mayor/Moderate adverse effect, lessening over time. Currently these homes generally have views over non-urban green land with uninterrupted views with the South Downs National park at its limit. So how the impact can be considered anything less than Mayor for perpetuity we cannot imagine. Has this assessment really been executed in an un-biased manner? Homes to the east (25no) and Rook Farm (20no) have been deemed to have the same values. Again, has this been properly evaluated?

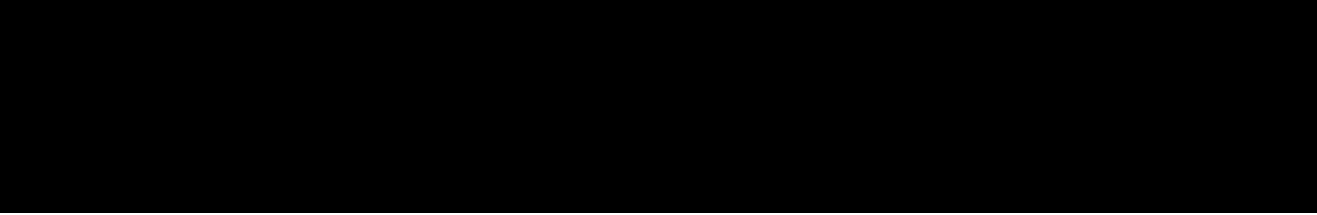
We also have concern regarding proximity of proposed houses to existing property boundaries but this can be challenged at detailed planning stage.

Sincerely,

Your Name

Additional Documents:

Objection Letter, Dated 14/02/2017, to the Application 17/00007



Date: 14 February 2017

Mr David Eaves
Case Officer
Havant Borough Council
PO9 2AX

Dear Mr David Eaves:

We object to the current application on material planning grounds as follows.

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Access

Flood Risk:

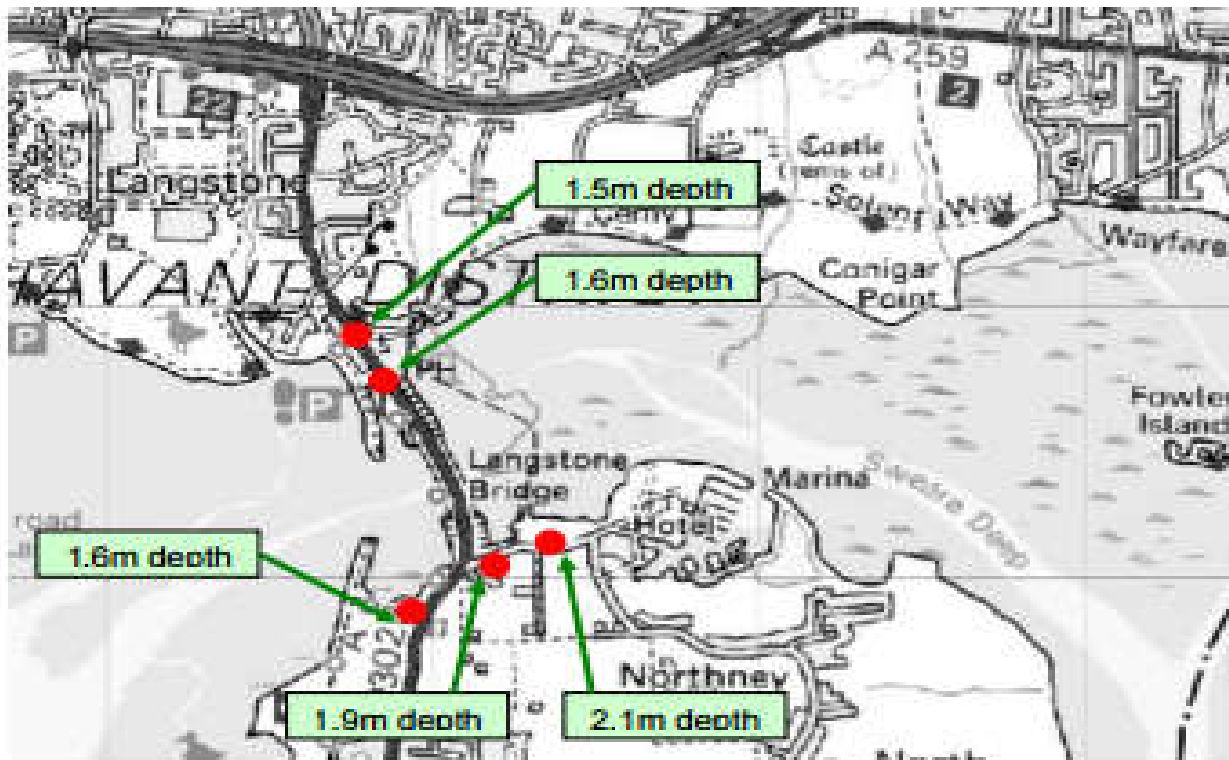
We would argue that you cannot consider this development on its local merits alone but to recognise that the large increase in volume of housing creates great risk to Hayling's current and proposed inhabitants.

Homes should be built where 100 years life can be guaranteed Hayling is uniquely at risk.

Figure 2: Extract from SFRA map showing areas at risk of flooding 2115



Figure 3: 2115 Indicative Flood Depths on Road Access (Source: PUSH SFRA and Environment Agency)



The potential depth of flood water identified ..is based on still water conditions. In reality waves/wind could make the ability to pass/cross flood waters more difficult. Inland flooding will increase as tidal height restricts the ability of rain water to disperse into the sea

Evidence then was clear that flood risk to the only vehicular access on/off the island is significant in terms of frequency and depth during the lifetime of any new housing development. The potential depths of water will potentially prevent all vehicular access. If this were to be coupled with a storm event then other means of access/escape (e.g. sea/helicopter) may also be difficult or unavailable.

2014 Strategic Housing Land Availability Assessment. P45

Initial estimates for the costs of flood defences to cover the southern Langstone, north Hayling and north west Hayling coasts would suggest in excess of **£30,000,000** flood defence costs

The costs of new/upgraded flood defences is unlikely to be met through developer contributions based on current economic factors and viability

Flood depths in excess of 0.5m are considered a 'danger for all' (including the emergency services) (Defra/EA R&D Report FD2320/TR2)

2014 Strategic Housing Land Availability Assessment. Appendix2

Access to the mainland without a funded improvement of infrastructure will put current occupiers at risk, decision makers are surely culpable if this evidence is ignored. Both the Council and the Government Inspector recognized this in 2013, we quote.

The Planning Policy Team recognises this concern and in turn, the issues relating to Hayling Island were recognised by the Inspector in the examination of the Havant Borough Core Strategy:

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. (P15Extract from paragraph 9 of the Inspectors Report).

HBC Windfall / Unidentified Housing Development Background Paper Sept 2013 P15

'Hayling Island has recognisable limitations for infrastructure. In particular the capacity with just one road on and off the Island with resulting emergency service access/difficulty etc. This was identified in the Council's Core Strategy and reflected in Hayling Island having a lower housing requirement than other areas. Crucially, it was also recognised and referred to specifically in the Inspector's Report on the Core Strategy (see page 15 of this paper)'⁷

HBC Windfall / Unidentified Housing Development Background Paper Sept 2013 P27

12 principles of planning" demanded by NPPF in paragraph 17 & 102 - planning should be

...taking full account of flood risk and coastal change. ...development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Gladman confirmed that the site slopes to the south and proposes to locate the SUD in the South East Corner however we would argue that this is not the lowest level of the site and would point out that due to the clay substrate the land suffers greatly from flooding.





Topography and drainage issues picture 1 Jan 2011, Pictures 2,3 February 2012 (more available)

Highway Issues

Again local constraints whilst of concern, noted later, the main issues is the main road (A3023) off the Island.

HBC Policy CS20 Transport and Access Strategy point 2

Development will be permitted that does not increase congestion and promotes better use of existing transport networks.” Clearly you will not be able to comply with this policy. Point 3 of CS20 says “Development will be permitted that improves accessibility to goods, services and employment and promotes equality in the transport system

We are aware of emergency service missing targets for responding, roadwork cause 2-3hr delays to users, similarly breakdowns. We understand that there is limited opportunity to substantially improve capacity. Again the NPPF requires plans of positive

...improving the conditions in which people live, work, travel and take leisure

NPPF para 9

Locally, one road into a site comprising of 210 homes seems risky, the main access point is a very busy road, with children travelling to the adjacent schools. The Goldring Close development has already had an impact on congestion and we have not yet felt the effect of the 150 homes at Station Road.

Nature Conservation

We have already responded separately regarding the absolute evidence of the use and therefore importance of the site to Brent Geese. The site has limited public access, protected on 3 sides by domestic housing, it being inland relatively high and adequately land managed, makes the site particularly attractive to them.

We note that Gladman has positively identified that Bats are present and we raise concern that the outline plan is to building very close to the southern boundary and apparently removes shrubbery along this line. Whilst they did not record any Great Crested Newts, again they did identify reptiles and we would point out that Stag Beetles, Slow Worms and Crested Newts to name just a few are absolutely present along this boundary.

This land is of good quality agriculture country side and with good management can help the wellbeing of Hayling and its inhabitants, both great and small, permanent and transient. It affords a green corridor from the very north and connecting to the east and west, right into Haylings most urbanised centre. We honestly believe that whilst this ‘space’ cannot be quantified and is not even noticed by the many of the Island dwellers, losing it will have a fundamental impact on quality of life of Hayling residents.

Effect of Listed Building

The removal of the view of St Mary’s Church from residences and whilst walking is a real loss of Historic context and value.

Trees

Whilst this is only an outline plan we are concerned that houses are being built too close to the existing trees, see Gladman's tree reference T13 (B). We would like to point out that mature poplar trees used to line the boundary to houses No.39a & b and we believe that the removal of these trees had an impact on the surface water issues/flooding ever since.

Design

Proximity of homes to Boundaries, size and density needs to be in keeping with homes in the South West Corner, current proposal is totally unacceptable.

Conclusion

We would like to have reviewed more detailed documentation on the points above (where is the ecology study?), but unfortunately the planning documentation is more glossy, and focused on other areas.

Thank you for reviewing our concerns. To us it seems completely obvious that to allow large scale development on the Island would be wrong. In these times of corporate culpability and the mass of evidence, which clearly shows that this development will have an adverse and irrevocable effect, we look forward to the refusal of this application. A robust, creditable and comprehensive Infrastructure review for Hayling. From here an update to the Local Plan 2036 reverting the Councils stance back to one of resisting large scale development on the Island. And finally, a clear program of improvements to support the visitors, residents, businesses and wildlife of Hayling Island.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.