

Mr L. Oliver (Case Officer)

Planning Development,
Havant Borough Council,
Public Service Plaza,
Civic Centre Road,
Havant,
Hampshire,
PO9 2AX



12/04/2022.

Dear Mr Oliver,

Submission of Objection to APP/21/01351, Outline application for erection of up to 60 dwelling units with access; associated landscape and highway works on land south of Saltmarsh Lane.

As a resident of Saltmarsh Lane I will outline my objections under four subheadings, which can be summarised as, the character of development, coastal erosion & flood risks, traffic & demographic concerns, and last but not least; environmental & conservation issues. The additional sources used have been referenced at the end of this letter.

This proposed development was not originally in the local plan. I find it distressing that the rejection of the local plan by government housing inspectors seems to have led to a situation where developers can submit applications on an ad hoc basis; out of the blue with little regard to the Island's infrastructure needs, traffic congestion concerns, demographics and sea defence issues.

Inappropriate character of development: At a baseline minimum, I strongly object to the severe proximity of the dwelling that I have marked with an 'X' on the attached illustrative master-plan (Drawing Number 1240-005-E). This dwelling is overly imposing and out of character with the bungalows and houses in Saltmarsh Lane and the surrounding area. Consequently I do not believe that the layout and positioning of this specific dwelling meets the requirements of paragraph 130 a-c of the 'National Planning Policy Framework' (page 38) which states, 'Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); '

I dispute that this dwelling is sympathetic to the local character and that the vastly increased density affecting several bungalows in Saltmarsh Lane is an appropriate

innovation of increased density. Put into perspective, the distance between the rear windows of bungalows 60 & 61 Saltmarsh Lane is around 13 metres from the proposed two storey house, with most of the imposition being on no. 60 (as much as can be assessed from the illustrative master-plan). In contrast the distance from the front windows of no.61, to the facing neighbour's windows directly opposite in Saltmarsh Lane is 30.6 metres. The distance of no.60 in the same respect is even greater. The rear gardens of these two bungalows are only 8.3 metres in length with an open view of 412 metres across the fields. The developer has proposed to reduce this to an inappropriate, overly cramped degree.

This proximity is totally out of character with the layout of Saltmarsh Lane and at minimum, the proposed dwelling that I have marked on the map should be removed.

Technically I understand that a minimum distance of 22m is required between facing principal windows in order to retain sufficient privacy and for developments over 2 storeys, this distance has to be increased. Where a principal window faces a solid obstruction a distance of 11m is required between the window and a single-storey structure or 14m between a principal window and a two-storey structure. However, this is an absolute baseline minimum and the historic context and character of the area should be strongly taken into account. I note within the submitted 'Planning Statement' document on page 13 section 3.9 'Building Heights' that the dwellings are intended to be a mixture of 1.5, 2 & 2.5 storeys.

Traffic congestion, insufficient road infrastructure, traffic studies & the Island's age demographics: Saltmarsh Lane and Denhill Close only has one exit route into West Lane and it is potentially likely that an extra 120 cars would put a very high strain on this relatively narrow lane with a new estate of an additional 60 dwellings. This might be the thin edge of the wedge to develop the remaining fields at the rear on an adhoc muddled basis. Hayling Island's road infrastructure would not be able to cope with this degree of housing pressure. The exit of Saltmarsh Lane into West Lane can be particularly hazardous and I have attached photographs which I hope will illuminate how inappropriate this route would be for more residents and heavy construction traffic.

A peak time study of traffic - including the summer period - using West Lane and the route through Brights Lane to the A3023 - the main road off Hayling Island - is also needed. This is relevant since the A3023 can become very congested, particularly during the summer, and in fact on any consistent extended period of sun on the Island, regardless of season.

I challenge the assumption made in the developer's 'Transport Assessment' on page 16, 5.3 that 'For the combined total 93.6% routing north it is proposed that the majority of these trips will use Brights Lane to access the A3023 as efficiently as possible. This is because of the better visibility and ease of accessing the A3023 from Brights Lane compared to the West Lane/A3023 junction to the north'. I understand the rationale but in my view, it doesn't take into account human psychology and nature. As an example, knowing the Island, my family and I know the sensible short cuts and when to avoid the A3023 as much as possible. Therefore we have more often used West Lane when travelling north and south. One of the frustrations of using Brights Lane in this context is weaving in and out of parked cars in the lane. In comparison West Lane is a more pleasurable, shorter and less stressful to drive through because of the

countryside. Brights Lane through to the A3023 is also the longer route off the Island.

Regarding demographics, it needs to be taken into account that developments impinge on people in different ways. Hayling Island's age demographics are important, since these impact on the quality of life on the Island. It is significant that of the Island's 17,415 population - as far as I have been able to assess - 4,680 people are over the age of sixty or what would commonly be recognised as retirement age. This is just over 25% of the Island's residents, which have a different way of life and needs; including infrastructure requirements. It should be further noted we are an increasingly ageing population nationally and this will have implications for development on the Island in the coming decades.

Undefended coastline: High flood risk zone and planning development in the right areas: Paragraphs 159 - 173 of the 'National Planning Policy Framework' direct the overall approach local authorities should take to flood risks in housing developments and where coastal change is in process. Paragraph 159 (page 46) specifically states, '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'.

The land proposed for development lies immediately south of a high risk flood zone as defined by the Environment Agency, which already covers significant parts of Saltmarsh Lane. With the affects of global warming and sea level rises that will be experienced over the coming decades, it seems more than likely that the Environment Agency will upgrade and extend this flood risk area, due to the current non-existent sea defences along parts of the west side of Hayling Island (See attached photographs of the coastline on pages 8 - 9 relevant to this planning application).

To reinforce my objection and argument; in a five page summary document 'Planning to adapt to climate change', using the UKCP09 scenarios specific to Portsmouth - now superseded and also applicable to Hayling Island - climate change projections over the next 70 years suggest it is likely that the sea level around Portsmouth will rise by 70 cm. However, the High++ scenario2 shows that sea level could rise by up to 190cm around Portsmouth's coasts in the next century.

Since these calculations were made scientific studies have progressed further. A satellite study in 2020 revealed that the Greenland and Antarctic ice sheets are losing ice six times faster than they were in the 1990s. The assessment was supported by NASA and the European Space Agency and is the most comprehensive to date. As artificial intelligence and faster computing evolves, more certain and accurate climate change modelling and projections will follow. Therefore the coastal defence management of Hayling Island is a serious issue for planners to weigh and assess.

It is essential that the Flood and Coastal Erosion Risk Management (FCERM) Strategy for the Hayling Island Coastline is completed before planning decisions are made. In light that the government's housing inspectors have rejected the local plan, it is important that no houses are built on land near high risk flood zones, or zones that may become high risk in the future, until an agreed strategy for improved sea defences and secure funding has been found. Using the Environment Agency's hundred year rule for sea defences, currently the council doesn't know what coastal

areas of Hayling Island it is possible to defend into the 21st & 22nd centuries, and what land may have to be transformed into saltmarsh (managed retreat). A good example is the Medmerry coastal realignment project in West Sussex, completed by the Environment Agency (now a RSPB nature reserve).

Environmental and conservation issues of concern: I am very much in agreement with Langstone Harbour Board's objection to the planning application, based on the recognition that the proposed development site is of local ecological importance to bat species (dominated by common and soprano pipistrelle), with soprano pipistrelle noted as a species of principal importance in the UK's Biodiversity Action Plan. I note in the 'Ecological Impact Assessment' that the fields have been ecologically degraded by agricultural activity but of high significance, the ditches and hedgerows are of local ecological importance, supporting connectivity in a sensitive area; sensitivity broadly defined by Langstone & Chichester harbours being recognised by the Ramsar Convention as Wetlands of International importance. From the south west from Lands End, Cornwall to Margate in the south east, there are only ten sites immediately on the coast that have this recognition. It is easy for the lay-person to forget how rare and valuable these habitats are.

It is note worthy on page 22 of the 'Ecological Impact Assessment' that H2 is a species-rich hedgerow with scattered mature oak trees. On page 30, 4.46 'Bat activity recorded by static monitoring on the site remains dominated by common and soprano pipistrelle species, with noctule, myotis species and brown long-eared also recorded'. under 4.48 it is highly significant that 'Soprano pipistrelle, noctule and brown long-eared are species of principal importance in England....' On page 30 under Figure 4.1: the illustration of 'hot spots' of bat activity has important implications to the ecological connectivity of the area and bat foraging behaviour; an interesting and significant discovery made by the ecological studies.

Nevertheless I think it should also be kept in mind - specific to the site - that limited ecological surveys have been done over a relatively short time scale. The unknown is an important factor in decision making. Further, on page 32 it is noted in section 4.61 'Surveys confirmed the presence of a high population of slow worm, based on a peak count of 53 adults recorded within approximately 0.26 ha of suitable habitat and the availability of connected, suitable habitats beyond the site boundary, including in adjacent residential gardens to the north and east, reptiles present on the site would be expected to be part of a wider population, present locally'.

Section 4.62 reinforces that 'The site could be considered as a 'key reptile site' (Froglife, 1999) as the slow worm population itself could be considered 'exceptional', given the peak count of over 20 adults. Slow worm is a species of principal importance. Given the presence of 'one or more notable species' could be used as criteria for allocating a SINCE, in Hampshire (Havant Borough Council, 2019), the population of slow worm utilising the site is considered to be of local ecological importance'.

This demonstrates that the site selected for housing development has far more ecological significance than meets the eye. As a person that loves nature and wildlife, these findings only reinforce my objection to the development.

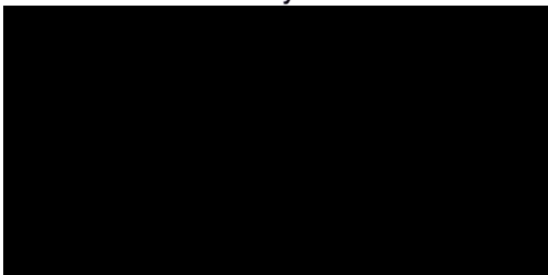
Lastly, I understand Natural England has given updated guidance and advice for Nitrate nutrient calculations and mitigation measures in this environmentally sensitive region. Consequently I believe the LPA has been forced to put housing development on hold until the issue is resolved.

In relation to the withdrawal of the local plan in combination with Natural England's new approach to Nitrate nutrients, I further understand that the leader of Havant Borough Council has written to the Rt Hon Michael Gove, Secretary of State for Levelling Up, Housing and Communities, outlining that the council cannot meet the government's allocated housing quotas. I am sure that an EXCEPTIONAL case exists for lower house building in the borough generally, and particularly on Hayling Island.

This has further reinforced the objections I have made.

Thank you for your patience. As a long-term resident of Saltmarsh Lane, Hayling Island; I hope my thoughts and objections will be valued with courtesy.

Yours Sincerely



Attached photographs & maps (pages 6 - 12).

Additional sources used:

The National Planning Policy Framework

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

<https://zhujiworld.com/gb/3107114-hayling-island/#details>

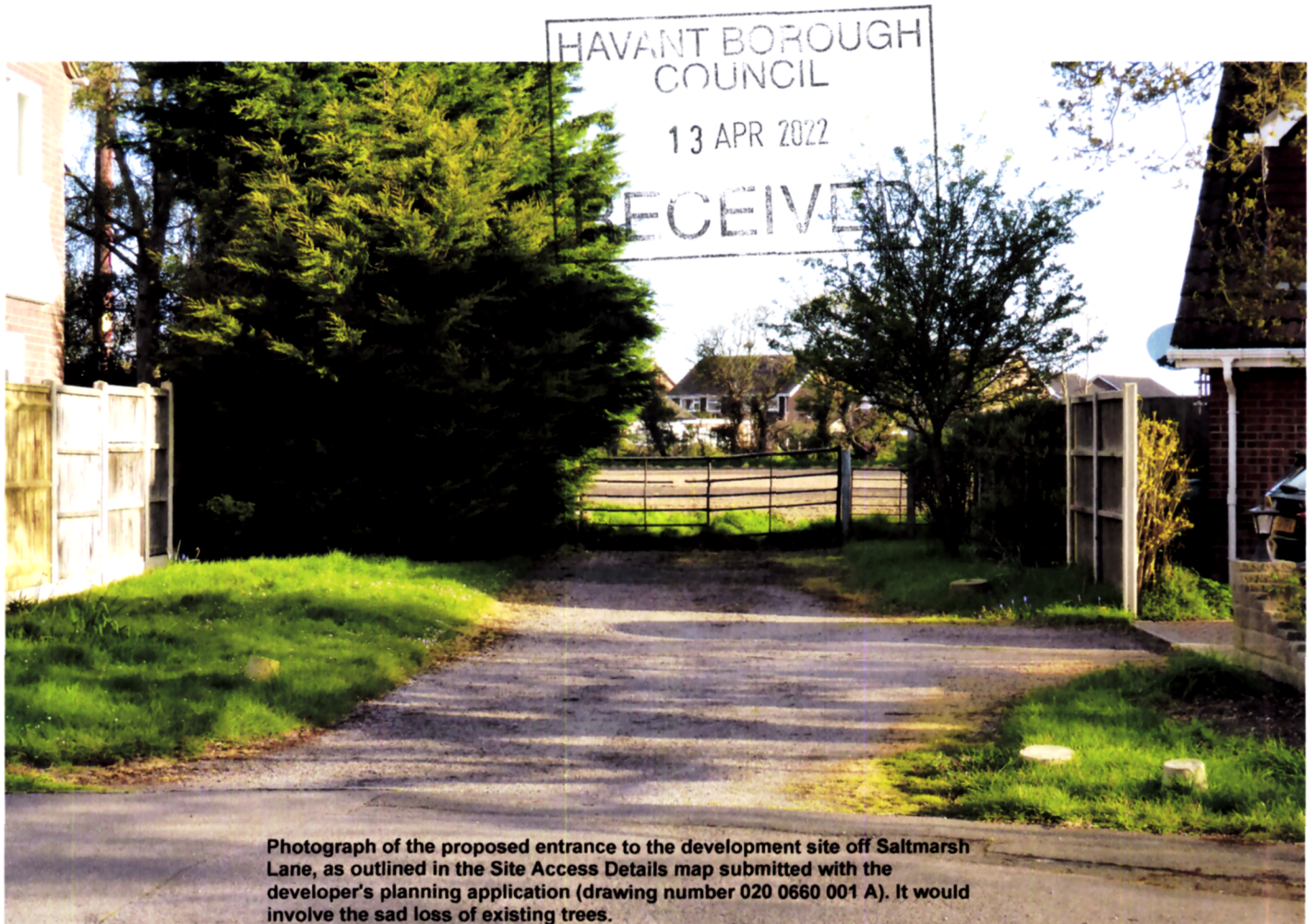
<https://www.portsmouth.gov.uk/wp-content/uploads/2020/04/pcc-climate-summary.pdf>

<https://climate.nasa.gov/news/2958/greenland-antarctica-melting-six-times-faster-than-in-the-1990s/>

<https://coastalpartners.org.uk/project/hayling-island-coastal-management-strategy-2120/>

https://ww2.rspb.org.uk/Images/medmerry_tcm9-405348.pdf

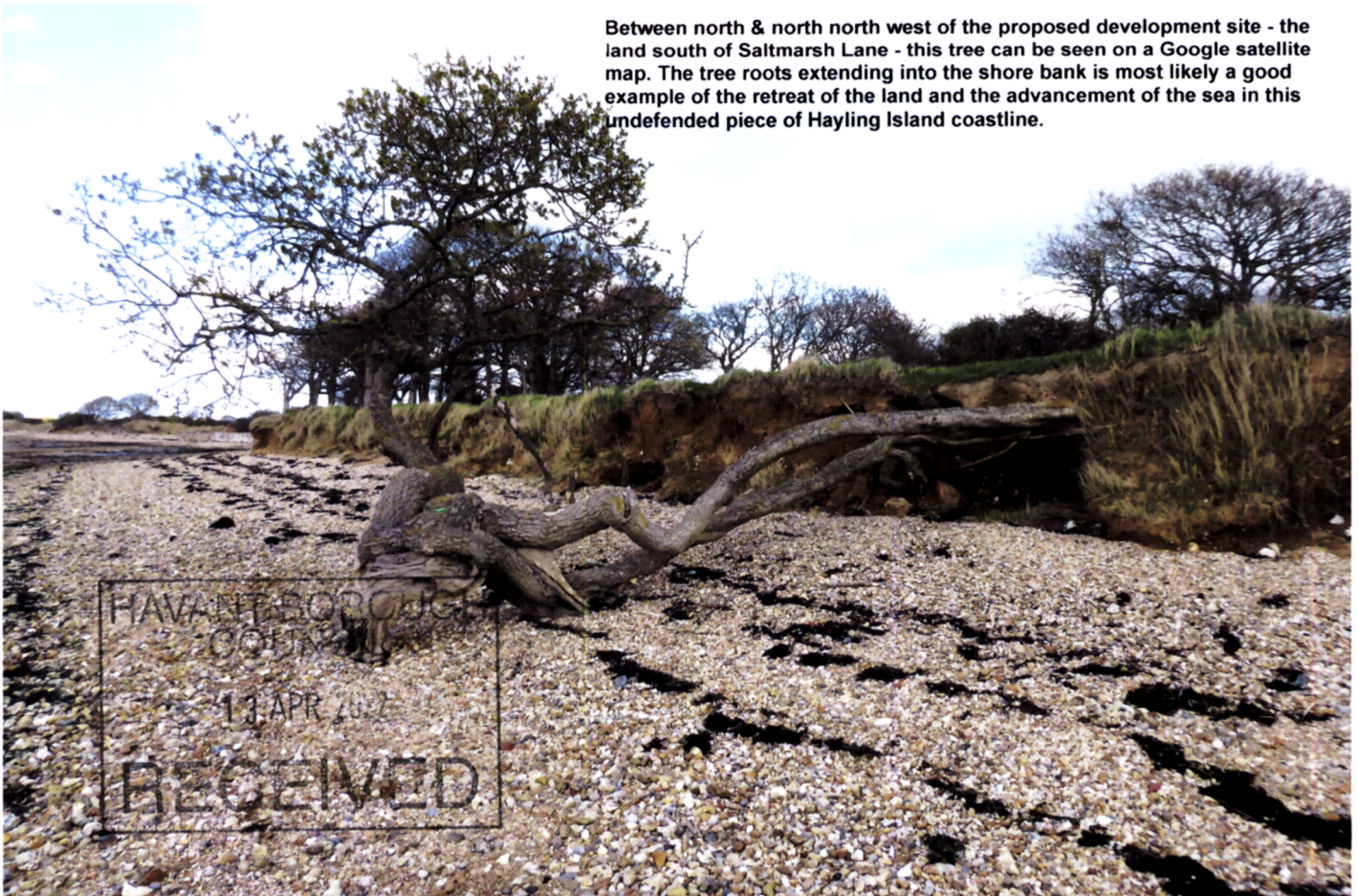




Photograph of undefended coastline looking towards houses in North Shore Road, Hayling Island. The proposed development (land south of Saltmarsh Lane) is only 260 metres east of this eroding coast. As Scotland rises and the south of England continues to sink into the sea from the last ice age, combined with the affects of global warming, the newly prepared walking path may not last long. How long would a new housing estate just 260 metres to the east last with rising sea levels; 20, 30, 40, 50 years?



Between north & north north west of the proposed development site - the land south of Saltmarsh Lane - this tree can be seen on a Google satellite map. The tree roots extending into the shore bank is most likely a good example of the retreat of the land and the advancement of the sea in this undefended piece of Hayling Island coastline.





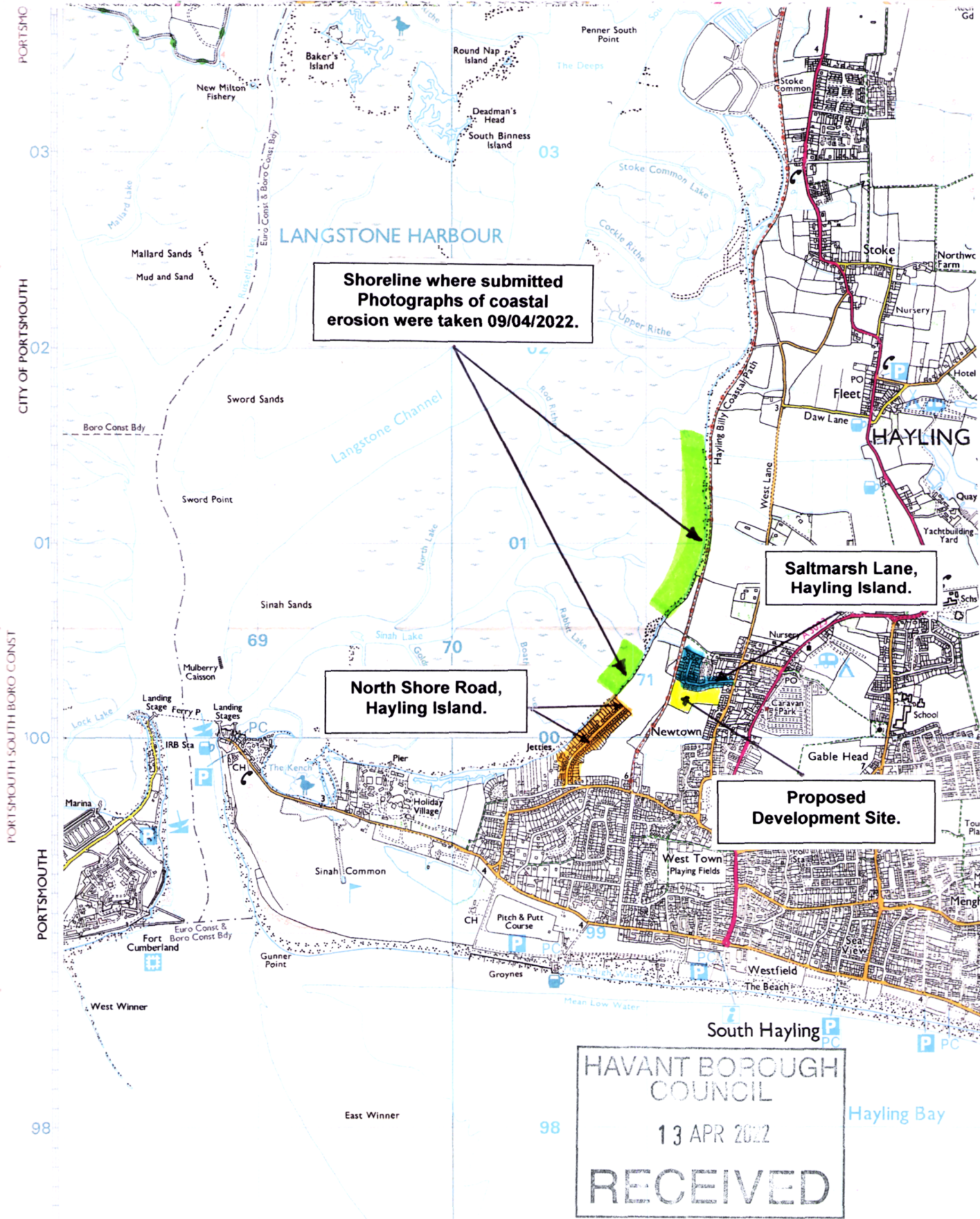
Example of how the sea is eroding the coast NW to NNW of Saltmarsh Lane, Hayling Island; just 500 metres away from the land proposed for development. See the Environment Agency's attached high risk flood zone map.

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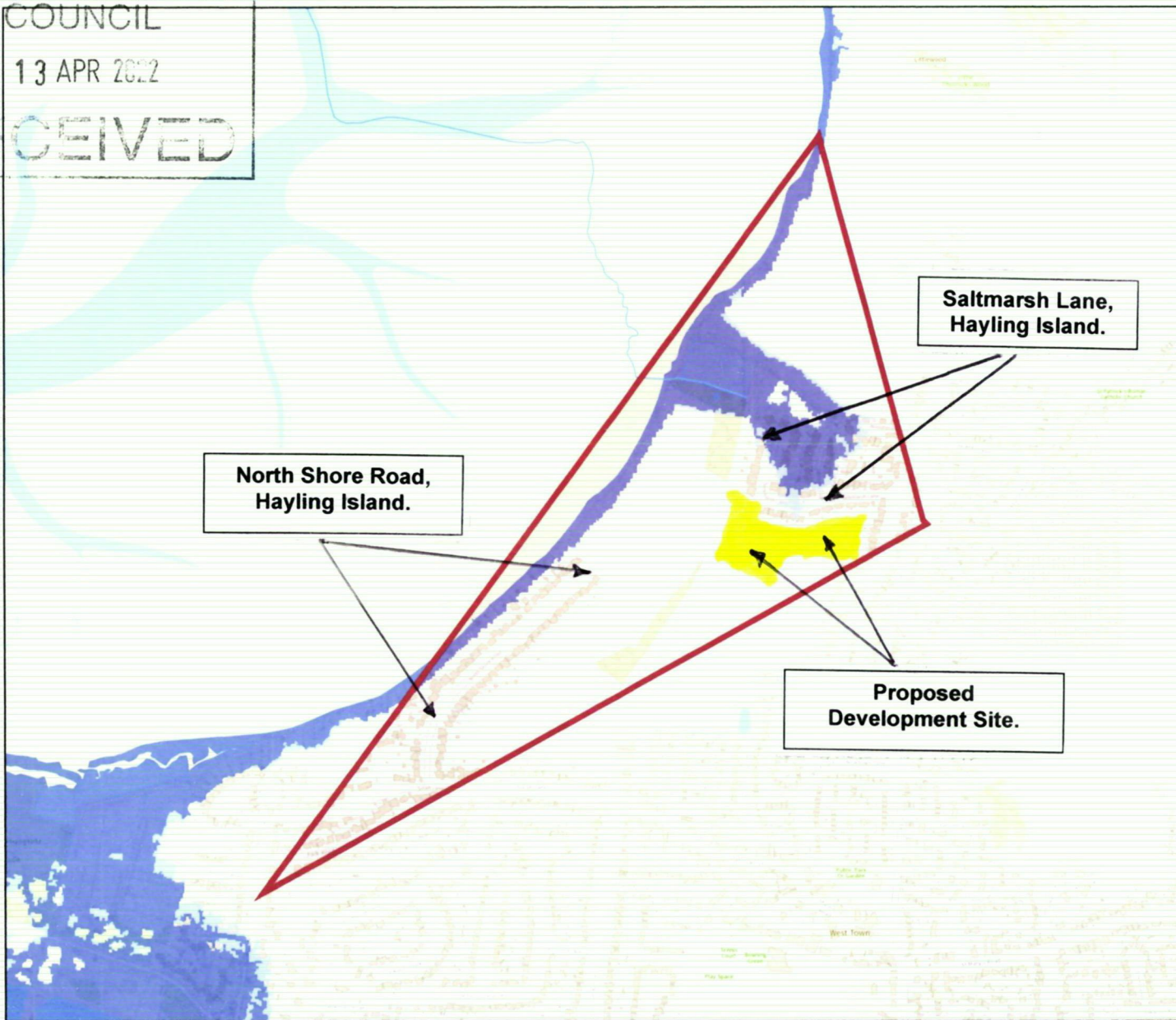


Further evidence of the crumbling coastline 500 metres from the proposed development site (land south of Saltmarsh Lane). This photograph was taken at 2.14 pm 09/04/2022 while the tide was low. Spring high tides in Langstone harbour can reach 5.15 metres. Especially combined with strong winds, they will continue to do serious damage to the coastline.

Ordnance Survey Explorer 120 Map. Scale: 1:25000,
4 cm to 1 km – 2.5 inches to 1 mile.



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Environment
Agency

Flood map for planning

Your reference

APP/21/01351

Location (easting/northing)

470900/100257

Scale

1:10000

Created

10 Apr 2022 19:19

Selected area

Flood zone 3

Flood zone 3: areas
benefitting from flood
defences

Flood zone 2

Flood zone 1

Flood defence

Main river

Water storage area

0 100 200 300m

Page 2 of 2

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N
0 10 20 30 metres
Site boundary 2.51ha (6.20acres)

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Land South of Saltmarsh Lane

Illustrative Masterplan

Date	07/10/2021	Scale	1:1,250 at A3	Drawn by	CT	Reviewed by	SR/ML
Drawn by	1240	Appr. by	005	Project		Author	E

Proposed two storey house overly imposing on rear windows and privacy of bungalows 60 & 61 Saltmarsh Lane, Hayling Island. Inappropriate and out of character with the properties established in Saltmarsh Lane and the local surrounding area.