



21st December 2020

Havant Borough Council (Planning Department)

Public Services Plaza

Civic Centre Road

Havant PO9 2AX

Dear Mrs Haywood

Ref: Application APP/20/01093 – Erection of 195 dwellings off Sinah Lane

Firstly, we were surprised by the Planning Department only allowing 23 days notice for people to comment on this on-going and important issue, especially in the middle of a pandemic and the lead up to Christmas.

Secondly, the decision at the recent Advisory DMC to “Approve” the original Application APP/18/00724 on what seemed to be largely financial grounds, did not take into account the 500 plus rejections by Hayling Island residents, equivalent to 99.8% of the comments submitted.

We wish to **strongly object** to this latest application at reference by Barratt David Wilson Homes for the following reasons:

- **Transport.** The recent 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). The route from Sinah Lane to West Town and to the shops, schools and Medical Centre in Mengham is by narrow roads and pavements which cannot be widened due to the close proximity of residential and commercial properties. It is necessary for pedestrians to cross roads for safer passage which is particularly hazardous for families with young children and prams. To expect the local population to take to walking and cycling for “well-being” reasons, 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 paltry offerings from the developer.

- **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.

- **Infrastructure.** The Health Centre in Mengham is already overloaded with increasingly long waiting times for appointments (3-4 weeks) with patients being diverted to Havant to reduce the load. Also, it is too far and unsafe for elderly residents to walk or cycle from Sinah Lane to the Surgery and they will necessarily use cars. The local schools are not near enough to the development certainly for young pupils to walk to the primary school necessitating the use cars for transport. In addition, it is reported that the primary is already close to capacity and there are schoolchildren already commuting to schools off the island. Any further increase in “school runs” will only add to further pressure on the relevant side roads and the A3023.

- **Flooding.** The eastern edge of Langstone Harbour already suffers 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. The development site and refuge area have a serious surface water flooding problem caused by a high water table as evidenced by large swathes of standing water in the fields after heavy rains. This is fed by ground water under the surface which rises and falls due to tidal forces. 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. 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”.

- **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.

- **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.

- **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.

- **Recent Government Housing Policy.** 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. It is hoped that HBC will:
 - abide by these recent revised Government guidelines
 - take full account of comments and concerns raised by the public in the Application
 - **reject** this latest Application from Barratt Homes.

Yours faithfully

