

To:
Ms Daphne Haywood
Planning Policy Team
Havant Borough Council
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PO92AX

Ref: APP/18/00724 Response to the Barratt Homes proposal with amendments at Site: Land at Sinah Lane, Hayling Island.

Proposal: Erection of 195 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.

Dear Ms Haywood

This letter sets out more points we would like to add to our previous letters of objection on 28th August 2018 and 8th April 2019 as well as our pre-submissions forms to the proposed Local Plan 2036 all of which relate to this resubmission with amendments to the planning application APP/18/00724.

1. Effective use of land

The proposal illustrates **ineffective** use of land. The proposal will not be '*safeguarding and improving the environment*'. Neither will it make '*as much use as possible of previously developed or brown field land*'. Therefore this application along with the most recent amendments is in conflict with the National Planning Policy Framework (NPPF) February 2019 section 11 Making effective use of land, page 35, point 117.

Just because Havant Borough Council (HBC) have apparently run out of brown field sites does NOT provide the green light to use an existing green field site, without regard for its current function and ecological importance; bowing to the pressure of land owners, developers and Government in the attempt to meet the 5 year housing supply for the whole Borough of Havant.

It was clear in the last full Council Meeting to discuss the Draft Local Plan 2036, that other more appropriate sites have been offered, but questionably refused, within the Havant Borough, such as the site near the ASDA roundabout in Stakes, WaterlooVille.

In addition, the "*Windfall/Unidentified Housing Development*" that HBC uses to estimate the additional windfall development is not fit for purpose. Inappropriately reducing the average annual windfall to "*ensure the estimate is realistic rather than optimistic*" along with more rounding down and possible non-inclusion of other developments, shows deliberate under estimating and reporting of the actual figures, resulting in projections that are clearly not of a standard on which to base policy. This would obviously push HBC into increasing its call for sites and underestimating future windfall projections.

There have been major discrepancies found not just to windfall sites but also the omitting of recent significant developments such as the adjacent "The Oysters" in 2015. This will have lead to inaccurate figures for housing to be taken into account when determining an appropriate housing supply.

More existing constraints should be recognised than are listed in Barratt Homes' own inadequate SWOT analysis found in the Design and Access section of the application. The only threat listed is the existing power line, demonstrating how superficially this site has been evaluated.

The following **site specific issues** are threats and/or weaknesses should at least include:

- change of land use from a green field site
- permanent removal of arable 'best and most versatile' good grade 3a agricultural land which is currently and continually worked - unlike other similar land on Hayling that is used for horse paddocks.
- severe ground water flooding (currently this site holds a huge volume of water post rain fall providing vital support to current drainage infrastructure) along with the effect of the development on current neighbouring properties
- the site is affected by tide locking (not mentioned at all in the amendment of the Flood Risk Assessment page 10)
- the proposed refuge is unsustainable due to the threat of coastal erosion and sea level rise along the coastline
- the viability of the above refuge depends solely on the success of another larger untested proposed refuge, E26, further north, which in itself has been shown to be unsustainable in perpetuity as it is within a flood zone 3 and will be degraded with coastal erosion, exacerbated by further climate change
- fragmenting and consequently destroying an **existing primary support site** (not secondary as stated in Barratt Homes' application) for Brent Geese
- this site is itself already a mitigation area for Brent Geese and Waders for the previous Barratt Homes development, The Oysters
- only one access point for 195 proposed dwellings (major issue for emergency servicing)
- increased pressure on Hayling's transport network (particularly A3023) from any large developments on the Island - including lack of any feasible mitigation
- services that rely on the A3023 to cover Hayling are all negatively affected by any increase in traffic, this includes emergency services and public transport.

A list of **further constraints** can also be found in our previous letters, relating to the **site as part of Hayling Island as a whole** and listed more generally at the end of this letter

The cul-de-sac nature of Hayling Island and the fact that there is only a sole route for access, the A3023 (which runs through a flood zone area which is highlighted by authorities and agencies such as the Environment Agency (EA) and Hampshire County Council as a major concern) must be emphasised.

It should be recognised that there are many benefits that come from this site's current land use. Within the NPPF 2019, section 11, Making effective use of land, page 35, 118. b) *'recognise that some undeveloped land can perform many functions, such as for wildlife,... flood risk mitigation,... carbon storage or food production'*.

The following **site specific** amenities and strengths include:

- good quality grade 3a arable agricultural land that is currently worked
- a key part of an ecological network that provides support for 9% of the world population a protected species i.e. Dark Bellied Brent Geese
- green field site which therefore contributes to the local SPA, Ramsar, Solent Maritime SAC areas

- contributes to the drainage infrastructure by holding a huge volume of water post rainfall, therefore reducing pressure on the entire drainage system and network of Hayling
- the wild flowers, other flora and features of a greenfield agricultural site already provide support for the huge biodiversity for Hayling Island. Amongst the diverse species supported at this site specifically are: Brent geese, slow-worms, bats, stag beetles, deer, field mice, bees, wide variety of butterflies and hedgehogs along with the more common fox and bird species - wheatear, chaffinch, goldfinch, wren, hedge and house sparrow, coal long-tail and blue tit, swift, swallow, green woodpecker, great and lesser spotted woodpecker, thrush, starling, collared dove, blackbird, robin, magpie, crow, woodpigeon - therefore supporting birds of prey: sparrow hawks, buzzards and red kites.
- contributes to the semi-rural character and sense of place of S W Hayling providing a natural attraction enjoyed by the tourists and visitors who cycle down the Billy Trail past the site, as well as the local residents who walk around the coastline

Therefore, all the above constraints and strengths demonstrate that the application is not an effective use of land.

2. Housing Density

The density of housing in the proposal is inappropriate.

The density of the proposal is 16.54 units per acre yet the current density of the surrounding housing is approximately 5 units per acre.

Whilst some increase in density is acceptable, this should be in keeping with the surrounding area. The proposal must take into account the existing environment and surrounding area, not looked at in isolation. The density is clearly out of character with the existing, neighbouring residences backing onto the site boundary.

3. Housing Design

There are contradicting statements in the Barratt Homes application - Analysis of Surrounding Development in the Design and Access Statement Pages 10 and 47.

On the one hand it correctly states, *'The majority of the dwellings in the vicinity of the site are detached and of unique design. There is therefore a very wide variation in materials and architectural detailing'*, then immediately contradicts itself describing, *'Overall, the surrounding development tends to be fairly plain and traditional in style, with the occasional occurrence of features which are more modern in style'*.

The analysis over generalises and fails to comment on the unique and individual designs of the current housing especially along Sinah Lane, appearing to choose examples to suit the needs of the application and its bland development plan.

Sinah Lane are examples of unique housing design illustrating the character of this area. All the houses surrounding the site are individual to look at. Even the one or two houses that may have been similar at build, have changed in style as the owners have adapted their houses over the years.

The proposal will **not** be, *'Improving the character or quality of the area'* (NPPF 2019, section 12, Achieving well-designed places, point 130, page 39). Therefore, *'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions'*.

4. Privacy and Overlooking

More contradictions can be found in the section on Boundary Treatments and Street Scene Elevations of the Design and Access Statement. Trees are shown behind the houses where there are no proposed trees on the development plan, or existing trees. This gives a false impression of

privacy for existing gardens whereas, in reality, there will now be definite overlooking of currently private gardens and homes including entire bungalows.

The amendments since the previous submission are partly due to the concern over lack of parking space. More garages have been included in the amendment but the layout of the housing has altered leading to even more overlooking and loss of privacy for existing residents as a result. For example, [REDACTED], all of which have south facing windows looking over our open garden and straight into our existing north-facing windows and patio doors and what is clearly a far worse scenario than in the first application of 2018. Our neighbours, as have we, designed our house improvements to utilise the openness of our properties.

Side-on houses with frosted windows backing onto gardens would provide more privacy than the current design; either this, or a much taller boundary solution than a 180cm fence. As it stands, this simple fence is all that is offered in the plans and will not prevent the loss of privacy and overlooking of bungalow bedrooms and in several cases entire downstairs living areas. Surely avoiding this problem is a basic planning requirement and the proposal and amendments cannot be accepted? Barratt Homes design houses with few windows at the sides clearly to prevent privacy and overlooking issues, so why not align the new houses so existing properties are not overlooked as well?

Should the proposal ever be passed, we expect to be properly and personally consulted on the final design and layout that immediately affects our own properties [REDACTED] to ensure each individual house and garden that is backed onto our land is NOT encroaching on our privacy.

When looking at the Barratt Homes development of The Oysters (2015), areas for 3 windows have been obviously bricked up on the first floor and the middle ground floor door or window of a south facing wall which looks towards the rear of the block of maisonettes at the front of the development. The planning and design for this Barratt Homes development was clearly inadequate and overlooking must have been a factor in this. Planners have a responsibility to ensure this situation does not arise again.



5. Sense of Place

Barratt Homes claim they are developing a 'Sense of Place' (Design and Access Statement, Page 48). However they are proposing to destroy the 'Sense of Place' already existing for residents and visitors/tourists to Hayling Island.

Again, the proposal is out of character and in conflict with the NPPF 2019, section 12, Achieving well-designed places, page 38 at 127, because it will not:

"a) 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) be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

[REDACTED]

c) be sympathetic to local character and history, including the surrounding built environment and landscape setting,"

The 'Sense of Place' created over the years by the existing residents from their own houses and gardens, and who moved here for the rural character of SW Hayling, wide open farmland with sea views and migrating bird life and the South Downs beyond, have not been taken into consideration at all.

The Design and Access Statement contains further methods which can give false impressions to a reader who is less familiar with Hayling Island history and landscape setting and falsify the facilities available.

As said in our previous letters, the Billy Trail is a leisure route for cyclists, walkers and horse riders; it is not a suitable commuter route to Havant for the majority who need to work off the Island.

The symbol used for the disused railway line is very similar indeed to the 'in use' railway lines on the transport routes map on pages 8 and 9 of the Design and Access Statement. Furthermore, having this leisure trail included in a map, where the only other highlighted transport networks are for 'in use' train routes, major A and B roads and motorways, is an outrageous attempt to mislead by Barratt Homes and an example of the underhand tactics employed. This is seen, by local residents, as a form of disinformation by Barratt Homes and HBC should raise this in their discussions with the developer.

The symbol of the steam train for the disused (over 50 years) railway station of the Hayling Billy on a map that only highlights other current transport available could, at first glance, easily mislead the reader into thinking a railway was still in use from Hayling to the mainland and is clearly inappropriate.

6. The Refuge

Barratt Homes' claim that their objective *'is to secure the condition of the area as suitable for waders and Brent geese in the long term and to increase its value from a **secondary** support site to a core site'*. (Design and Access Statement Page 10 and page 47),

This, again, is **factually incorrect** to the benefit of Barratt Homes.

This area is a **Primary Support Site** and already has a higher and more important classification due to the fact that it already provides a habitat for over 500 over-wintering Brent Geese, properly uploaded to the Solent Bird Survey and shown in photographs and video data in winter 2017/18.

Within the Local Plan 2036, policy E17 shows that there is little difference between Core Areas and Primary Support Sites - 5.228 *"...like Core Areas, the unmitigated loss of a Primary Support Area will be refused by the Council due to the negative impact this would have on the SWBG ecological network and, thus, the integrity of the Chichester & Langstone Harbours SPA."*

However, the difference between Primary Support Areas and Secondary Support Areas is greater providing a lot less protection from development to Secondary Sites. Therefore, it is critical that a site's classification, with regards to Brent Geese support, is not misrepresented.

This proposed refuge cannot stand alone in this application as mitigation for the Brent Geese and Waders, as it is dependant on the success of the larger refuge proposal, E26, which we have already shown in the above threats and weaknesses, to be unsustainable and in our letter of 26th August

2018 and the additional letter of 8th April 2019. The latter demonstrates, with photographic evidence, there were clearly attempts to skew the survey data by operating different planting regimes on the whole site in the winter 2018 -2019. It is policy that these refuges must be shown to be successful before building can take place and that should be without tampering with their foraging crops, crop rotation or the existing area of sight lines necessary for the Brent Geese.

Additionally, in the proposal for the refuge, Barratt Homes assume it can create new biodiversity and net gain and mixes this with the protection of rare species and specific habitats. The existing habitat provides attractive arable crops for migratory protected birds along with the list of biodiversity already supplied above in our list of Amenities and Strengths. To destroy this habitat and replace it with one which will **not** be as attractive to the rare and protected species, must be wrong, inappropriate and against the principles of the NPPF 2019 and HBC's own conservation guidelines and policies.

Barratt Homes' attempt to make their biodiversity plans sound impressive and specify Badgers as species they are helping to conserve and attract. Yet HBC's own survey (*CMS2590: Hayling Island Cycling and Pedestrian Improvements Feasibility Report February 2017 at page 66*) show "*No badger setts or signs of badgers were found*".

Barratt Homes claim they will lessen the disturbance to the Brent Geese but the disturbance to, and complete alteration of, their habitat, created by the plans and works in this proposal far outweigh the current disturbance which is already suitably legislated against. The farmer can only 'disturb' the birds to protect his crops at certain times of year, at the beginning of their arrival, according to the latest guidelines, and is no longer able to shoot the birds.

The lack of adherence by Barratt Homes to legally binding mitigation agreements in the recent past, since 2015, has actually not put the birds off foraging on the crops. Whilst Barratt Homes did not attempt to uphold their mitigation requirements for The Oysters Development until the 2018, when this was finally pointed out to them by HBC after we exposed this issue, the lack of good fencing to prevent disturbance did not actually prevent 500+ Brent Geese from foraging in the field as was proven in November 2017.

Barratt Homes are attempting to convince planners and councillors that they are now doing the right thing but they are producing misleading information and distracting from the real issues at risk.

7. Ecological Mitigation

In the Design and Access Statement page 9 Barratt Homes attempt to demonstrate that the proposal is worthy of planning permission because they claim to '*Protect wild life habitats and wildlife corridors to prevent the fragmentation of existing habitats and allow species, for example Brent Geese, to respond to the impacts of climate change by making provision for habitat adaptation through e.g. coastal realignment and species migration*'. However what is being proposed is nothing less than '**fragmentation**' of an existing habitat and the provision that is proposed will itself certainly be degraded and possibly destroyed by coastal erosion.

E14 of Havant Borough Draft Local Plan 2036 page 143 states:

'All development in Havant Borough is expected to protect, conserve and enhance the Borough's Local Ecological Network. Planning permission will only be granted where:

- b. The development **avoids the fragmentation** of the Local Ecological Network;*
- c. The applicant has identified and assessed the level of ecological value of the site through **adequate and proportionate information** and any matters arising have been addressed through an avoidance or mitigation plan; and*
- d. Any necessary mitigation plan **includes provision for ongoing management and maintenance.**'*



All this has not been achieved in the application and amendments.

Moreover, in the section of the application on Information to inform the Habitat Risk Assessment (HRA), there is no confirmation that the RSPB (or anyone else) will confirm responsibility for managing the proposed refuge in perpetuity.

Barratt Homes themselves actually recognise that several significant effects are likely as potential impacts of the development, as already listed in the constraints above and in the previous letter of 8th April 2019. These **must** be taken into account when weighing up the pros and cons of the planning balance.

8. Infrastructure

As made clear before, this application cannot be considered feasible, sustainable or even viable when the major infrastructure problems for the whole of Hayling Island are considered.

a. Traffic

The traffic on rural grade roads and an already overstretched road capacity on the A3023 has knock-on effects, not just to Hayling but to Havant and beyond. This has been demonstrated further since the original application.

Portsmouth Water's supply failure in June, causing the main single carriageway to be closed for over 24 hours, affected emergency services, schools and caused at least 4 hour delays for travelling both to and from Hayling Island. It also impacted, over a 10 mile radius, the whole borough and beyond, which will have had an economic impact.

Emergency vehicles struggled to access Hayling Island along with more public service vehicles. Police had to be called in to prevent large vehicles accessing the Island as there were no suitable roads for them.

This illustrated how unprepared authorities are to deal with such events showing that any '*emergency plan*' is inadequate or undeliverable. This episode unavoidably demonstrated how Hayling fundamentally depends on the A3023 as its life-line and sole route of access. Future issues resulting from increased traffic congestion caused by large housing developments are therefore a foreseeable threat to the Island's population and, as such, would demonstrate negligence by authorities if allowed to happen.

Tourism and leisure activities such as a Raft Race on 20th July 2019, at Langstone, caused the traffic in the whole borough to come to a standstill for hours travelling both on and off Hayling Island.

Our infrastructure clearly cannot cope now let alone with 195 more dwellings and the traffic and servicing demand that this would create.

The Hayling Island and Havant Borough Council Transport Assessment (HBCTA) was published in January 2019, however, following the '*Satchwell Amendment*', further assessments are required which are understood to be due for submission in October 2019.

This application cannot progress until the HBCTA has been properly addressed including consultation with the Hayling Island Infrastructure Advisory Group (HIIAG).

Barratt Homes recognise the fact this date has been set so this calls in question the timing of this re-submission; once again during the summer holidays when many interested parties and individuals are away over the 21-day consultation period.

The fact that Sinah Lane runs east - west means that throughout the year the angle of the sun at sunrise and at sunset can be very difficult for drivers travelling East or West respectively. Within the last 12 months there has been a car accident due to this. This road has become noticeably

increasingly busy with fast moving vehicles and more accidents are likely to happen with the new proposed access.

b. Flooding, Drainage and Sewerage

To read in the Flood Risk Assessment 1182678 on page 18 that, *'The proposed onsite surface water pumping station is to be offered for adoption as part of an adoptable surface water drainage scheme and thus will become the responsibility of a Local Sewerage Authority'* gives rise to serious concerns. The ongoing criminal practice by Southern Water for local sewerage disposal, affecting back gardens, drainage channels, the protected SPA and RAMSAR sites of the Langstone and Chichester Harbours, is creating health hazards as well as destroying the reputation of our so called 'Blue Flag' Beach. Southern Water have demonstrated they **cannot** be trusted, let alone be given this responsibility which they claimed they had not agreed to in the HIIAG meetings of 2017-18.

In the section on Sewer Flood Risk, Barratt Homes state *'There are no recorded incidences of sewer flooding within the vicinity of the site'*.

There have been recent spills of sewage recorded just north of the site and elsewhere on Hayling Island! As with the traffic, there is only one access route off the Island for the sewage therefore a breakdown in the system affects the whole network and demonstrates the pressure it is under. Langstone Harbour, which is in the vicinity of the site, and the Hayling 'Blue Flag Beach' nearby, are both polluted after every heavy rain storm due to Southern Water's proven incompetence and criminal activity. Southern Water is now being investigated by the Environment Agency (EA).

Similar concerns arise by the statements on page 21 relating to management of the SuDs: *'Consideration has been given to the long-term maintenance of the proposed drainage structures. SuDS attenuation basins, bio retention areas, granular filter drainage and all associated external pipe-work, chambers and manholes will be the responsibility of a management company'*. *'A detailed maintenance schedule will be provided by the designers during the detailed design stage of the surface water proposals'*.

This unacceptable passing on of any responsibility and future on-costs cannot be allowed to pass under the radar. Who will fund this in the long term? Will it be HBC and therefore the taxpayer?

Furthermore, the fact that the actual development site is situated inside Flood zone 1 and therefore not at risk, is irrelevant and again looking at the proposal in isolation from its surrounding environment. The areas nearby to this site and the coastline of the proposed refuge area to the North of the site are at risk of flooding due to coastal erosion, climate change and sea level rise. There are no plans for significant flood defence and, within 50 - 100 years, this land will be cut off from other parts of the Island. Different access arrangements will be needed for the current residents, let alone those in new developments. The proposal is therefore unsustainable for servicing and access in perpetuity.

In relation to the Surface Water Flood Risk section of the application, the EA flood map is used as evidence that the site lies outside the risk area. However the photographic evidence, we have submitted over the past 3 years in our letters of objection, refutes this.

In addition, the tide locking issues, which will be exacerbated with the effects of rising sea level, have been evidenced by the Eastern Solent and Coastal Partnership and described in detail in our earlier letters. However, tide locking has not been considered at all in this Risk Assessment, which therefore remains inadequate.



If a site is affected by tide locking, how can pumping underground water above ground be a solution to mitigate against flooding? Any water that is pumped above ground will be immediately replaced by more water; pumping cannot, therefore, be seen as a feasible solution.

Furthermore, any pumped water from below ground to the surface will contain contaminants e.g. detergents, bleaches, oils from vehicles, chemicals from construction etc. causing irreversible damage to the local ecosystem. This was an issue when developing the Oysters on already contaminated land.

In this era of environmental awareness informing the basis of policy, how can pumping chemicals into an otherwise untouched green field environment be an acceptable and sustainable practice!

9. Consultation with the Local Community

It is unacceptable that the re-submission of this application has not been more openly advertised by the Havant Planning Department.

The remains of illegible original application notices for 2018, on tiny pieces of weather-worn, rotten paper, can only be found on a few lamp posts. The excuse that this is a re-submission and doesn't warrant further advertising, does not take into account the new residents who have moved into the area in the last year, let alone alerting all residents – several of whom do not use computers or social media.

Once again the majority of the response has been the result of Hayling's community groups ensuring as many people as possible have been made aware.

In addition, just as last year, the consultation has been timed to match the peak holiday season when many residents are unavailable to respond in full. The employees of HBC own planning team, who are connected and responsible for communication concerning this application, are also on holiday across the consultation period.

This poor practice is inadequate, does not meet with the principles of the NPPF for requirements on consultation and has led to even more disquiet and distrust of HBC and for Barratt Homes, from the Hayling Island community.

Some of the issues raised by residents related to development on this site include:

- The single route of access (A3023) to and from the Island is already at capacity
- New residents will need to commute on and off the Island
- Any infrastructure mitigation will not be enough to have any significant impact on the extra traffic
- Impact on the ability of emergency services to access the island
- Area around the bridge is soon to be compromised by flooding due to climate change
- Issues surrounding the integrity of the bridge structure
- People are moving off HI because their commute over the bridge has become so difficult
- People are already missing appointments made in the middle of the day due to traffic on the A3023
- Increased summer tourists using the A3023
- Increase traffic volume could be ruinous to the Island attracting tourism
- A3023 congestion impacts area of 10-mile radius on mainland
- Economic impact from increased traffic congestion
- Car park spaces on the bend in West Town already cause disruption to traffic flow
- Traffic speeds up when reaching Station Road
- Other similar site application refused on Hayling for reasons that apply to this site
- Health Centre provision already under pressure
- Demographic of Hayling residents adds to pressure on Health Care

- Questionable justification for why houses may be built on green field land
- Inadequate re-submission advertising - simply remains of illegible original application notices for 2018, on tiny pieces of weather-worn, rotten paper, that can only be found on a few lamp posts - does not take into account the new residents
- Consultation has been timed to match the peak holiday season 2 years in a row
- Development represents an ineffective use of land
- Other more appropriate sites have been offered, but questionably refused
- "*Windfall/Unidentified Housing Development*" that HBC uses to estimate the additional windfall development is not fit for purpose
- Under estimating and reporting of the actual windfall development figures
- Development and design is not 'in character' with the area
- Proposed housing density many times higher than surrounding area
- Privacy and overlooking concerns from design of development
- 180cm fence surrounding 2 story homes clearly inadequate for prevention of overlooking and loss of privacy for existing properties
- Inaccurate street scenes in planning application
- Evidence of previous poor Barratt Homes planning with bricked up windows in the Oysters development
- Inappropriate symbols and maps used in application designed to mislead re: Billy Trail
- Inaccuracies in application about current site and species protection
- Threat to protect species such as Brent Geese, Stag Beetles, Slow-worms
- Detrimental environmental impact on the Hayling Billy Track and Nature Reserve
- Large area of currently in use, "best and most versatile" agricultural land will have to be converted to the refuge even before building takes place to provide the evidence that the refuge 'works'
- Binding legal agreements on this site for previous mitigation for the loss of 2.5ha of land for Brent Geese from the Oysters development
- Lack of maintenance of fences on the east side of the site to deter dog walkers from regularly using the field for daily walks and scaring wildlife
- Reduction in the space and surrounding environment which is necessary for the Brent Geese for clear sight lines to avoid predation
- Site cannot be seen as a *replacement* as site is already being used by the geese
- Proposed refuge is not new; not adjacent to; not an improvement to adjacent less frequently used sites; will not provide an equivalent level of resource due to reduction in foraging land and removal of clear sight lines; and does not upgrade other support areas.
- Field suppose to be continually used for crop rotation to encourage Brent Geese
- Previous attempts to create refuges for Brent Geese unsuccessful e.g. Portsmouth College
- The crop rotation on field H34C has been *interfered* with this winter by strange partial planting
- 2018-2019 surveys are skewed due to partial planting
- Small area of planted field was sprayed and the crop was destroyed
- Survey results are being manipulated in favour of development
- There will not be robust boundaries and screening for the smaller proposed refuge
- Protected species will be negatively affected by construction noise and increased human presence
- Mitigation relies on purchasing third party land, funded by multiple, unrelated development proposals
- Land likely to be adversely affected by sea level rise as right on the edge of a Zone 3 flood risk
- Erosion and coastal squeeze is a major concern for the proposed refuge
- Currently a local economic incentive for managing this northern area privately

- Decrease in the area that is put aside for the Brent Geese and Wader refuge, impacting ever more negatively on already dubious mitigation proposals
- Priority funding would not be allocated to an area that is privately owned
- There is no record of a SFRA or an Exception Test for the site of the refuge
- Inappropriate comparison between agricultural losses and untested biodiversity gains
- Disregard for the rich ecology of the area
- Erosion of several metres of field coastline including their trees in recent years
- Habitats Regulations Assessment January 2019 shows in Table 9 that the following local important sites will be affected: Chichester & Langstone Harbours SPA; Chichester & Langstone Harbours Ramsar; Portsmouth Harbour SPA; Portsmouth Harbour Ramsar; Solent & Dorset Coasts SPA; Solent Maritime SAC
- Site within the distance of 5.6km recommended as not suitable for development by Habitat Regulations Assessment 6.13 and Solent Recreation Mitigation Strategy
- Loss of Grade 3a “best and most versatile” agricultural land – currently worked
- Keeping this grade of agricultural land for farming is a government priority
- Food security is of major importance
- Agricultural land itself should be recognised as of benefit to the environment
- Proposed SuDs pond water will be full of pollutants/chemicals
- SuDs pond will clearly not be suitable for the Brent Geese yet inside refuge area
- SuDs pond will create more pollution compared with the pre-development situation
- Water table becomes very high and will even rise and fall with the tide (tide locking)
- Pumping underground water above ground cannot be a solution to mitigate against flooding when site is affected by tide locking
- Continual underground action of pumping of water from underground may destabilise/unsettle/undermine the structural integrity of foundations of buildings and roads
- Who will fund maintenance and repair subsequent ecological damage?
- SuDs pond will create perfect habitat for mosquitoes
- SuDs pond will create insecticide treatment runoff to adjacent land and waterways
- Land is already prone to severe groundwater flooding
- Major effect on the flooding in adjacent gardens which already suffer from runoff from the field when it floods
- Increased pressure to current mains drainage systems during rainfall as the field currently acts to hold a vast quantity of water after heavy downpours
- Questions over current facilities for sewerage for Hayling Island
- Southern Water has previously denied responsibility to maintain the proposed systems.
- Barratt Homes suggest a private contractor at the expense of the taxpayer

In conclusion, we continue to **fully object to this application** for all the reasons given in all of our 3 letters as well as our pre-submission forms to the proposed Local Plan 2036.

This re-submitted application with amendments continues to be untimely, contain factual errors, has not satisfactorily dealt with any of the issues we have raised in the past. The amendments fail to improve the application, having actually worsened the site layout for existing neighbouring residents.

It is imperative that all Havant Borough and Hayling councillors are in full knowledge and understand in depth the issues surrounding this application. Councillors must appreciate the detail that local residents have had to delve into to expose the problems that further development, such as this one, on Hayling Island will bring to the whole of Havant Borough.

Yours sincerely

