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[REDACTED]

27th August 2018

Planning Policy Team
Havant Borough Council
Public Service Plaza
Civic Centre Way
Havant
Hampshire, PO9 2AX

Dear Sirs

RE: Erection of 195No. dwellings, associated open space, pumping station, sub-station and formation of new vehicular access off Sinah Lane. Change of use of land from agricultural to a Wader and Brent Geese Refuge Area | Land at Sinah Lane, Hayling Island

I write to strongly object to the proposed new development of 195 Houses on farm land behind Station Road, for the following reasons:

1. SUSTAINABILITY

Central Government's National Planning Policy Framework, which should be used by Havant Borough Council (HBC) to decide on this application, has a common thread throughout, which is that all new development should be sustainable.

It should be obvious that without drastic improvements to the Island's infrastructure (see item 2 below) there is no way that development can in any way be described as sustainable.

2. INFRASTRUCTURE

2.1 Road Network

The A3023 Havant Road is already very congested at peak times (and all other times given the slightest problem such as Monday morning bin emptying or a broken down car) and together with Hayling Bridge is the only route on and off Hayling Island. As such Hayling Island is unlike all other areas of the borough, which have multiple access through the road network. The A3023 is literally the Island's lifeline and HBC should be above considering this as a significant factor in the proposed Local Plan.

Currently there are well over 25,000 journeys per day, which is well above the designed capacity of the road. With the proposed large scale development, this figure would dramatically increase, which would require a dual carriageway if the road and bridge were being built today. This increase is totally unacceptable and taking into account the current level of traffic/delays, could well bring the island to a stand still at certain times. This would certainly have an impact on visitor numbers, trade and most importantly the Emergency Services, who currently cannot meet the required 8 minute response time. Any significant increase in homes, without drastic work to upgrade the A3023 and bridge, would certainly lead to loss of life, as the Emergency Services struggle to reach to urgent cases within the prescribed time period.

As a member of the local Coastguard Rescue Team I have first hand experience of the time it takes to get off the Island in peak times, even using blue lights it can take 15 minutes to get from the South to North of the Island.

Delays of this magnitude can literally be the difference between life and death.

The applicants Transport assessment are very disingenuous. For example when calculating the number of car movements they have decided not to include any vehicles for the 30% of affordable housing units, these people obviously cannot afford cars!

Also their walking distances are incorrect to make everything appear to sit below government guidelines, when they clearly do not.

The section dealing with Station road also manages to gloss over the extremely dangerous pinch point by the West Town Pub, which was adjusted following the Oysters development and is now even worse. It is only a matter of time before there is a serious accident in this spot and the thought of adding an additional 195 households does not bear thinking about. Together with frequent deliveries to the Pub, The Fencing Company and Jewsons, regular buses and other traffic all on a blind narrow bend with a minimal pavement on one side only, I cannot conceive how HBC could allow the proposed extra traffic to worsen this problem

2.2 Statutory Authorities

With such a large increase in homes will come a significant increase in demand for power, gas, water and sewage.

All of the above are already over stretched. The water pressure is at best 2 bar and in the last 6 months we have had 2 extended power outages. The old sewer system barely copes with the current throughput and the treatment works at the top of Langstone Harbour regularly dumps raw sewage into the harbor when there is high rainfall.

Southern Water have recently stated that they have no intention of upgrading in the near future and will continue to discharge raw sewage into the harbor when

required, By allowing this large number of extra homes HBC will be complicit in this practice and will certainly impact on the harbour users and could well affect our Blue Flag beaches.

Unless the complete sewer system and treatment works are upgraded, the extra homes could well cause the whole system to fail.

2.3 NHS Health Centre

The Hayling Health Centre is already under significant load. With an additional 195 homes comes a significant increase in the demand for the Health Centre taking it well beyond breaking point.

There is no space to put any additional consultation rooms, without significant new building work such as a second storey to the building. The only solution would be for new residents to use Health Centres off the Island, if they have spare capacity, which will in turn increase traffic and is certainly not a sustainable proposition.

2.4 Education

The schools on Hayling Island are already struggling to cope with the current demand. As with the Health Centre and 195 new homes will push them past breaking point. Again a solution may be to use schools off the Island, but this is both unsustainable and for primary schools, against the National Planning Policy Framework. Again this will increase traffic on and off the Island adding to all the problems associated with this.

Getting a contribution to build more classrooms will be a suggestion, but this will only reduce outside space is not a long term solution, just a quick fix for the developers who want to make a large profit and move on, leaving Islanders to pick up the pieces.

3. ECONOMY

As an Island community, Hayling Island is unique in the Borough and wider area. A popular holiday destination for both day trips and longer stays, both of which form a large part of the Island's economy and employment opportunities.

In trying to force the proposed number of new homes on the Island, with all the associated problems listed above, HBC risk changing the Island's character for the worse. Holiday makers will be put off by the traffic jams, as they were in the past decade and Hayling Island will cease to be a holiday destination and become an over crowded housing site, with no prospect of employment and a worsening economy.

HBC must consider the huge investment needed in infrastructure to accommodate an increase in homes of this magnitude, who would fund such investment

Failure to address this could have significant negative economic consequences for the Island, which the Island may never fully recover from due to the cost and problems associated with upgrading the infrastructure to meet the increased population demands.

4. ENVIRONMENT

4.1 Flooding

The proposed site regularly floods when there is high rainfall. This would point to the fact that there is a high water table and poor drainage through the ground. To ensure that surrounding that the surrounding area's flood risk is not increased, all surface water would need to be taken away by the drainage system, which is already over capacity.

The site is also perilously close to a Zone 3 flood site and will certainly be included in the next Environmental Agency update as global warming continues.

There is a real concern that the proposed development will elevate the water table in the area, causing significant impact on nearby properties.

If this application is given consent, will HBC indemnify all current nearby residents for any water table issues caused by the development?

4.2 Langstone Harbour SSSI

The proposed development site is very close to the Langstone Harbour SSSI, in fact within 200 metres. The introduction of 195 new homes in such close proximity to the SSSI, can only have a negative impact.

English Nature will of course have to be consulted, so we will let them deal with all the complex issues associated with a development of this size being proposed so close to an SSSI.

The proposed site is also in close proximity to the Langstone Harbour Ramsar site. Any development, especially new homes in the number planned, will have a significant negative impact on the site.

The proposed development site borders the Hayling Billy Trail Nature Reserve (HBTNR) and at the North East corner encroaches on the High Spatial Woodland Priority Habitat.

Again English Nature will be consulted on this and we are sure will not allow protected habitats to be built over in this way.

With proposed new home being built adjacent to the HBTNR, the diverse wildlife living in the hedgerows will certainly be affected and in time lost. New homes will bring domestic pets, which in such close proximity will decimate the wildlife.

4.3 Prime Farm Land

The proposed development site is grade 3a prime farmland.

The National Planning Policy Framework suggests being on such land should be avoided in favour of sub prime farmland.

There would certainly be a loss of farming jobs if this site was developed. With a significant increase in population there comes a point where the Island needs to include opportunity to employ Hayling Islanders to create a more sustainable community. The current proposal has the complete opposite effect.

4.4 Wildlife

To ask for a change of use from farm land to a brent geese and wader refuge is strange as the current use is agricultural and still a refuge for brent geese. Also this area is already stated as a refuge for geese by the applicant themselves in their 106 agreement with HBC dated 18th September 2015, which was mitigation to allow their previous development to go ahead. (see below)

A rich and wide range of animals, birds and insects some of which are protected species currently use the proposed development site.

Part of the field which the proposed site is in, is an RSPB Reserve, primarily used by Brent Geese as a grazing ground. These geese also use the proposed development site, especially in Northerly or North Westerly winds, where they gain extra protection from the existing properties in North Shore Road.

Any development in this location will significantly reduce the area available to graze and for the reasons given in item three above, not provide a safe environment for the birds to graze.

Other species currently using the proposed site include deer, shrews and bats. The latter are a protected species and HBC should undertake a survey, before the proposed site is put into the local plan.

This site was outlined in the Applicant's Brent Goose Mitigation Strategy (Tyler Grange 17th October 2013), which formed part of their Section 106 agreement with HBC, to allow the development on the Oysters Site on Station Road.

HOW ON EARTH CAN THERE NOW BE AN APPLICATION TO BUILD ON THIS LAND?

4.5 Coastal Erosion

The west shoreline of Hayling Island is currently in a poor state with much good quality farmland already lost. There are virtually no sea defenses and no plans for any in the future. The shoreline above the proposed site is particularly bad, with around 2 metres lost in the last year alone. This is the protected reserve for the Brent Geese, which is why more and more often they graze on the area behind North Shore Road.

This situation is only going to get worse year on year and it is vitally important to retain the proposed development site for the future grazing grounds for these birds.

As seen from the above points any development on Hayling Island of the proposed scale is wholly inappropriate given the current restraints.

All of the above points must be investigated thoroughly and addressed, before any proposed development sites of the size put forward are included in the Local Plan.

We would also note, that under the current adopted Core Strategy (2011-2026), the proposed sites and number of new homes, would not meet the criteria set out under the following headings:

- CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough
- CS15 Flood and Coastal Erosion Risk
- CS19 Effective Provision of Infrastructure
- CS20 Transport and Access
- DM3 Protection of Existing Employment and Tourism Sites
- DM8 Conservation, Protection and Enhancement of Existing Natural Features
- DM9 Development in the Coastal Zone

This site was originally at the forefront of the Draft Local Plan, but due to the huge response from Islanders with many of the above points raised, it was changed to a potential site for LATER development, once all issues raised had been consulted on.

This process is ongoing and as such I think it is wholly inappropriate for an application to be lodged now, before this work is complete. Also the timing of the application during the summer holidays is typical of an underhanded developer who wants to get permission at all costs. This together with the disingenuous consultants' reports, their public exhibition, which got no positive remarks from local people, shows they have no respect for the Island or its inhabitants, they just want to make a quick profit and move on.

I truly believe HBC have more than enough reason to decline permission in this instance.

Yours faithfully

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Mr. J D Hulls

By e-mail & Post