

– LAND TO NORTH OF SINAH LANE

- 1. Introduction.** The following comments are in addition to those submitted earlier and are referenced against the HBC Local Plan and the Barratt Homes Compliance Statement.
- 2. Transport Infrastructure Assessment. HBC Policies IN1/2 and CS2/3. Barratt Infrastructure Delivery Statement.**

On 18 June 2018 Barratt Homes (Hd of Planning) advised Hayling Island (HI) Residents on the subject development "...that the Hayling Island Highways and Transport Infrastructure Assessment will be published soon, and our application will therefore be considered alongside this Assessment". This Assessment is still outstanding as a result of the "Satchwell Amendment" and the HI Infrastructure Advisory Group has not been involved to date in the review of the Traffic Assessment. However, Barratt Homes has still submitted this latest amendment to their original application.

The Barratt Transport Assessment has not fully addressed the A3023 overload issue as evidenced in their Compliance Infrastructure Delivery Statement summary at para 3 which states "...the overall impact of the road network is **not** considered to represent a severe cumulative impact on the road network". Recent experience by residents and visitors using the A3023 would suggest that any additional local traffic will only exacerbate the overload problem further and could lead to "unsustainable" levels as defined by the National Planning Policy Framework (NPPF).

The Transport Assessment places great emphasis on residents walking and/or cycling to shops, amenities, schools and medical facilities. However, it does not take into account the narrow roads and pavements leading from Sinah Lane to West Town and Mengham. It is necessary for pedestrians to cross roads for safer passage and cycling on the A3023 is extremely hazardous. Also, the Hayling Billy Trail, subject to coastal erosion and heavy rainfall, and A3023 currently do not offer Hayling Island residents safe and all weather cycling and pedestrian routes to the mainland.

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. This will mean more load on the A3023 during peak time periods. Barratt Homes has conveniently disregarded this issue.

The Island has an ageing population, many of whom are not able to walk long distances or cycle and therefore rely on cars for transport. Therefore, Barratt's aims to seek "behavioural change" are seriously flawed.

Despite mitigation proposals by Barratt, the Transport Assessment is deemed to be flawed and **Not Fully Compliant** until proven otherwise.

- 3. Transport and Parking in the New Development. HBC Policy IN3. Barratt Transport Assessment.**

The development is densely populated with a 6 metre wide single entrance off Sinah Lane. It should be noted that Barratt's original pre submission proposal was for 165 dwellings which is

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now increased to 195 dwellings in the same area. Although Barratt has submitted a plan to demonstrate provision for "...varying sizes of vehicles... etc" it does not take into account the need for the parking of multiple emergency vehicles (fire/ambulance/police) in the event of a major emergency. Also, the entrance to the pump houses area is a cul de sac and there is insufficient room for large tankers to access in the event of sewage pump failure or spillage as evidenced recently in several sewage spillages and pump station failures on the Island.

Weaknesses in their Parking Plan deems it to be **Not Fully Compliant**.

4. Future Management and Management Plans. HBC Policy IN5. Barratt Legal Agreements.

Barratt Homes recently completed the nearby Oysters development. Barratt was lacking in two areas –no follow up on their declared mitigation for the adjacent Brent Geese foraging field (now designated as a potential "Brent Geese refuge") and, according to Oysters residents, slow action on the rectification of "snags" on the site for which they are responsible. The long term management and maintenance responsibilities need to be legally binding and clearly defined for issues such as utilities (water/sewage/electricity/gas), on-site maintenance, Suds and swale maintenance, sites not formally adopted and refuge management for this proposed development before further consideration by HBC Planning..

5. High Quality Design. HBC Policy E1, E12 & H1-4. Barratt Design Access Statement.

Although the application meets the basic requirement as stated, the design of the houses on the development is not in character with the local housing. Also, it does not take into account the demography of Hayling Island with a large retired and ageing population requiring single storey and "lifetime" homes with disabled facilities in the development. The amended version includes 4x3- storey L shaped buildings as part of meeting the affordable housing criteria which are potential eyesores within the development and to residents in existing adjoining properties. The amended application does not address the issue of security of the development once completed. There are 2 pedestrian access points on to the Hayling Billy Trail, one next to a car park, which would give potential criminals easy access to and from the site. The lack of a permanent police presence on the Island, the nearest being Havant, currently offers little comfort to current residents and is unlikely to improve in the future. Barratt has not taken into account the benefits of environmental building design e.g. solar panels and water harvesting. In respect of the above, the dwelling designs and security aspects are deemed **Not Fully Compliant** with HBC Policy guidance.

6. Health and Wellbeing. HBC Policy E2. Barratt Design and Access Statement.

The Health Centre in Mengham is already overloaded with increasingly long waiting times for appointments (3-4 weeks) and 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. Additionally, there are schoolchildren already commuting to schools off the island, and any further increase will add to further pressure on the A3023.

7. Public Open Space. HBC Policy E9. Barratt Landscape Plans.

Barratt has designated that the Public Open Space will be used as a storage for water in the event of heavy rain. This field is already subject to serious groundwater flooding which takes a

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long time to dissipate. Therefore, this contingency is deemed to be inadequate, could impact on the public area and nearby dwellings for long periods and alternatives need to be addressed.

8. Historic Environment. HBC Policy E13. Archaeological Assessment.

Comments by the County Archaeologist (6 Aug 2018) 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 addressed by HBC or the developer.

9. Local Ecological Network. HBC Policies E14-17. Barratt Habitat, Brent Geese and Biodiversity Surveys/Assessments.

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.

a. Protected Species

- Despite the mitigation proposals, the development on the agricultural land and surrounding hedgerows will have an unquantifiable impact on the existing wildlife such as deer, birds, snakes, lizards, hedgehogs and rabbits.

b. Solent Wader and Brent Geese

- Any survey carried out during winter 2018/19 will be flawed due to a change in crop rotation. This resulted in Brent Geese not feeding on the proposed refuge area and large numbers moving to other fields north of the site for foraging.
- The proposed refuge will be rye grass and clove which is not normal foraging for Brent Geese. Feeding is normally on eel grass (*Zostera*) at low tide and young winter crops at high tide.
- Additional people walking along the path at the north end of the development are likely to disturb foraging geese in winter.

10. Flood Risk & Drainage. HBC Policies E 19 & E20. Barratt Flood Risk and Utilities Statement.

Past Flood Risk Assessments indicate that 50% of Hayling Island will be subject to submersion or flooding by the end of the century. HBC and the developer seem to have placed little regard on the latest revised Environment Agency's Flood Risk Management LTIS 2019 document which states "inappropriate development in an area of high risk of flooding should be avoided by directing development away from areas of highest risk". The eastern edge of Langstone harbour already suffers from tidal erosion and the site has serious ground water flooding. Although Barratt has provisioned with a pumping station and Suds system, this is reliant on the already fragile foul water/sewage infrastructure as proven recently. Any future developments should be put on hold until more flood risk information is available and the Island's sewage infrastructure is updated to support existing and additional windfall and development housing.

11. Conclusion. Barratt Homes is not fully compliant with several HBC Local Plan Policies as detailed above. Strongly object to this Amended Application.

31 July 2019