

Mr & Mrs P Barratt

Millefleurs, 53 St Marys Road, Hayling Island, Hampshire, PO11 9DB
[REDACTED]

Date: 14 February 2017

Mr David Eaves
Case Officer
Havant Borough Council
PO9 2AX

Dear Mr David Eaves:

We object to the current application on material planning grounds as follows.

Planning Policy & Inspectorate Requirements:

The NNPF requires a sustainable development plan and HBC removed this site from its Local Plan 2036 until a full and robust 'Infrastructure' review and plan was developed.

3.23 In response to key issues raised through consultation on the Draft Local Plan Housing Statement by a number of stakeholders, the Council has determined that sites on Hayling Island are not appropriate for 'early release' and the site or area specific issues raised should be fully explored through the new Local Plan

3.24 The consultation on the Draft Local Plan Housing Statement highlighted specific infrastructure issues on Hayling Island which will require further investigation before future development can be considered sustainable under the NNPF.

2.1 Havant Borough's Adopted Local Plan (Core Strategy 2011 and Allocations Plan 2014)⁹ covers the period until 2026 and continues to form the basis for determining planning applications in the Borough.

Local Plan Housing Statement Dec 2016

This site was removed from the Adopted plan and this was endorsed by the Government Inspector Sue Turner less than three years ago.

These sites are adjacent to each other and in the same ownership. The Council acknowledges that it had earlier supported the allocation of UE35, but justifies its omission from the Plan on the grounds it would lead to the delivery of too much housing on Hayling Island as well as their classification as being "uncertain" for Brent Geese and waders through Policy DM23.

The landowner has objected to the omission of these sites from the Plan on the grounds that additional housing is needed on Hayling Island and that the classification under Policy DM23 is not supported by robust evidence. However the housing restraint on Hayling Island is justified by evidence and consistent with distribution of housing set out in the CS. The classification of these sites under Policy DM23 is supported by evidence and whilst it does not preclude development, it is a matter that would need to be addressed through further study and potentially through mitigation in any future plans for development.'

Report to Havant Borough Council - An Inspector appointed by the Secretary of State for Communities and Local Government Date: 7th July 2014 clause 74 & 75

Ms Turner concluded in this report clause 35:

It has been argued that the Plan fails to make adequate provision for housing land on Hayling Island. However development on Hayling Island is restricted by accessibility and environmental issues and the allocation of sites in this Plan is consistent with the distribution set out in Table 6.1 of the CS. **No evidence has been submitted to justify re-aligning the distribution or increasing the amount of housing allocated on Hayling Island.**

Access

Flood Risk:

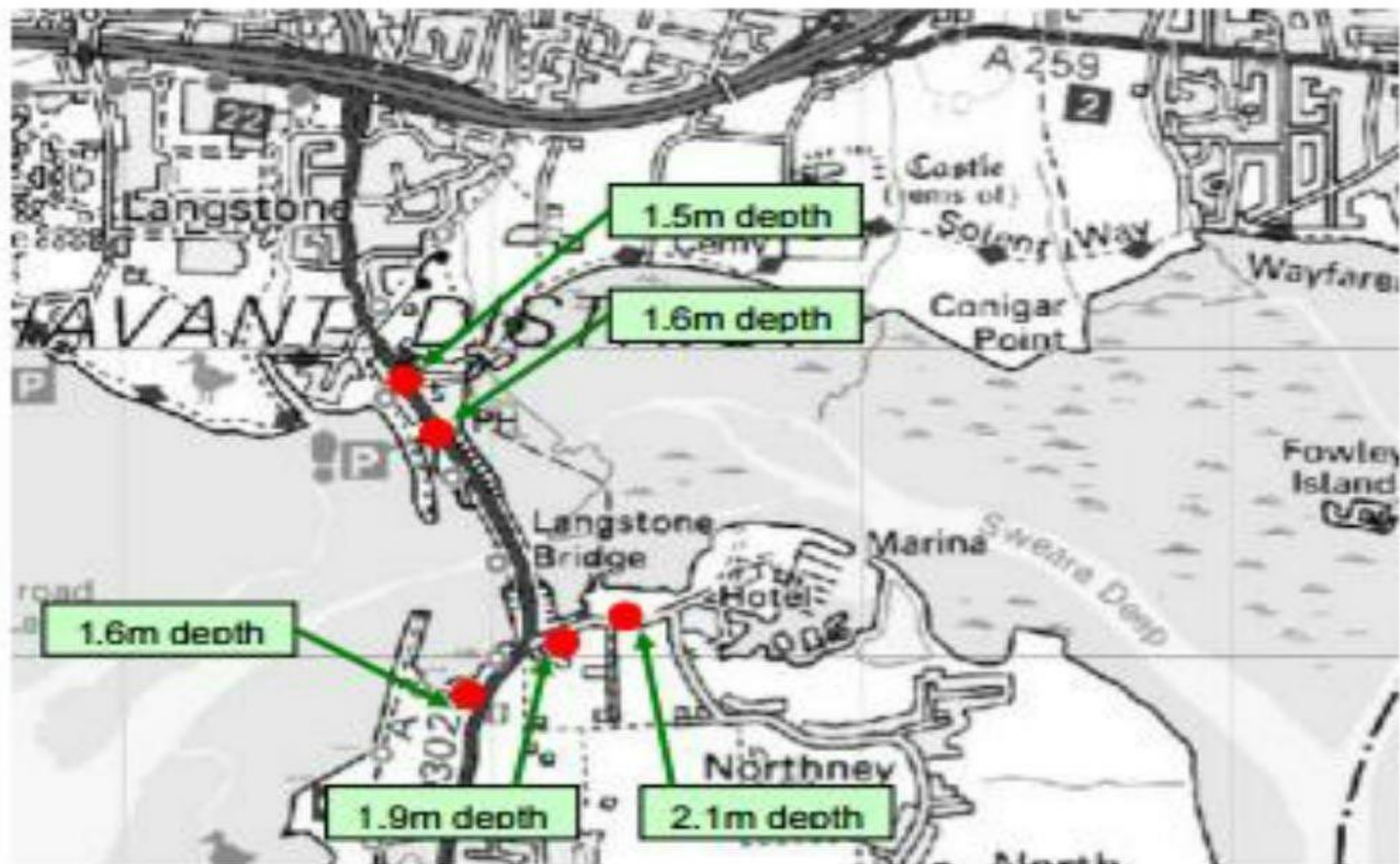
We would argue that you cannot consider this development on its local merits alone but to recognise that the large increase in volume of housing creates great risk to Hayling's current and proposed inhabitants.

Homes should be built where 100 years life can be guaranteed Hayling is uniquely at risk.

Figure 2: Extract from SFRA map showing areas at risk of flooding 2115



Figure 3: 2115 Indicative Flood Depths on Road Access (Source: PUSH SFRA and Environment Agency)



The potential depth of flood water identified ..is based on still water conditions. In reality waves/wind could make the ability to pass/cross flood waters more difficult. Inland flooding will increase as tidal height restricts the ability of rain water to disperse into the sea

Evidence then was clear that flood risk to the only vehicular access on/off the island is significant in terms of frequency and depth during the lifetime of any new housing development. The potential depths of water will potentially prevent all vehicular access. If this were to be coupled with a storm event then other means of access/escape (e.g. sea/helicopter) may also be difficult or unavailable.

2014 Strategic Housing Land Availability Assessment. P45

Initial estimates for the costs of flood defences to cover the southern Langstone, north Hayling and north west Hayling coasts would suggest in excess of **£30,000,000** flood defence costs

The costs of new/upgraded flood defences is unlikely to be met through developer contributions based on current economic factors and viability

Flood depths in excess of 0.5m are considered a 'danger for all' (including the emergency services) (Defra/EA R&D Report FD2320/TR2)

2014 Strategic Housing Land Availability Assessment. Appendix2

Access to the mainland without a funded improvement of infrastructure will put current occupiers at risk, decision makers are surely culpable if this evidence is ignored. Both the Council and the Government Inspector recognized this in 2013, we quote.

The Planning Policy Team recognises this concern and in turn, the issues relating to Hayling Island were recognised by the Inspector in the examination of the Havant Borough Core Strategy:

I concur that growth on Hayling Island should be limited/restricted, to take account of flood risk, the need to minimise impacts on the natural environment of Chichester and Langstone harbours and access difficulties on the local road network at peak hours. (P15Extract from paragraph 9 of the Inspectors Report).

HBC Windfall / Unidentified Housing Development Background Paper Sept 2013 P15

'Hayling Island has recognisable limitations for infrastructure. In particular the capacity with just one road on and off the Island with resulting emergency service access/difficultly etc. This was identified in the Council's Core Strategy and reflected in Hayling Island having a lower housing requirement than other areas. Crucially, it was also recognised and referred to specifically in the Inspector's Report on the Core Strategy (see page 15 of this paper)'⁷

HBC Windfall / Unidentified Housing Development Background Paper Sept 2013 P27

12 principles of planning" demanded by NPPF in paragraph 17 & 102 - planning should be

...taking full account of flood risk and coastal change. ...development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Gladman confirmed that the site slopes to the south and proposes to locate the SUD in the South East Corner however we would argue that this is not the lowest level of the site and would point out that due to the clay substrate the land suffers greatly from flooding.





Topography and drainage issues picture 1 Jan 2011, Pictures 2,3 February 2012 (more available)

Highway Issues

Again local constraints whilst of concern, noted later, the main issues is the main road (A3023) off the Island.

HBC Policy CS20 Transport and Access Strategy point 2

Development will be permitted that does not increase congestion and promotes better use of existing transport networks." Clearly you will not be able to comply with this policy. Point 3 of CS20 says "Development will be permitted that improves accessibility to goods, services and employment and promotes equality in the transport system

We are aware of emergency service missing targets for responding, roadwork cause 2-3hr delays to users, similarly breakdowns. We understand that there is limited opportunity to substantially improve capacity. Again the NPPF requires plans of positive

...improving the conditions in which people live, work, travel and take leisure

NPPF para 9

Locally, one road into a site comprising of 210 homes seems risky, the main access point is a very busy road, with children travelling to the adjacent schools. The Goldring Close development has already had an impact on congestion and we have not yet felt the effect of the 150 homes at Station Road.

Nature Conservation

We have already responded separately regarding the absolute evidence of the use and therefore importance of the site to Brent Geese. The site has limited public access, protected on 3 sides by domestic housing, it being inland relatively high and adequately land managed, makes the site particularly attractive to them.

We note that Gladman has positively identified that Bats are present and we raise concern that the outline plan is to building very close to the southern boundary and apparently removes shrubbery along this line. Whilst they did not record any Great Crested Newts, again they did identify reptiles and we would point out that Stag Beetles, Slow Worms and Crested Newts to name just a few are absolutely present along this boundary.

This land is of good quality agriculture country side and with good management can help the wellbeing of Hayling and its inhabitants, both great and small, permanent and transient. It affords a green corridor from the very north and connecting to the east and west, right into Haylings most urbanised centre. We honestly believe that whilst this 'space' cannot be quantified and is not even noticed by the many of the Island dwellers, losing it will have a fundamental impact on quality of life of Hayling residents.

Effect of Listed Building

The removal of the view of St Mary's Church from residences and whilst walking is a real loss of Historic context and value.

Trees

Whilst this is only an outline plan we are concerned that houses are being built too close to the existing trees, see Gladman's tree reference T13 (B). We would like to point out that mature poplar trees used to line the boundary to houses No.39a & b and we believe that the removal of these trees had an impact on the surface water issues/flooding ever since.

Design

Proximity of homes to Boundaries, size and density needs to be in keeping with homes in the South West Corner, current proposal is totally unacceptable.

Conclusion

We would like to have reviewed more detailed documentation on the points above (where is the ecology study?), but unfortunately the planning documentation is more glossy, and focused on other areas.

Thank you for reviewing our concerns. To us it seems completely obvious that to allow large scale development on the Island would be wrong. In these times of corporate culpability and the mass of evidence, which clearly shows that this development will have an adverse and irrevocable effect, we look forward to the refusal of this application. A robust, creditable and comprehensive Infrastructure review for Hayling. From here an update to the Local Plan 2036 reverting the Councils stance back to one of resisting large scale development on the Island. And finally, a clear program of improvements to support the visitors, residents, businesses and wildlife of Hayling Island.

Sincerely,

Philip Barratt