



13/03/2019

Planning Department

Attn. APP/18/00724 Case Officer (Daphney Haywood)

Havant Borough Council

Public Service Plaza

Civic Centre Road

Havant, PO9 2AX

Dear Daphney

Ref: APP/18/00724 – Additional Comments – Period Sep 2018-Feb 2019

Introduction. The following are comments on the Barratt's Planning Application (APP/18/00724) to build 195 houses on the land to the north of Sinah Lane on Hayling Island designated H34. The comments are additional to those already submitted by the deadline of 4 September 2018. They cover issues which have occurred during the period from September 2018 to February 2019 and reinforce concerns expressed earlier. These comments are separate from responses submitted to the recently issued HBC Pre-Submission Local Plan 2036.

- 1. Proposed Brent Geese Refuge.** The area to the north of the development (H34C) is assigned by the developer for a SuDs and has also designated it as a Waders and Brent Geese Refuge. During the period under discussion, only the northern part of the field was sown with winter wheat and the area assigned for development was left fallow – this is a first that local residents can remember and will undoubtedly skew any recordings taken in this field during winter 2018/19. In the past, Brent Geese used to feed in this field in large numbers; however, there has been a noticeable lack of feeding Brent Geese this winter, possibly due to use of "bangers" in the field last year and the change in sight lines along the field. There is concern that this much reduced size of the refuge to about 5.7ha. and the prospect of a development is unlikely to attract the return of Brent Geese to the field in future.
- 2. Flooding.** A recent presentation by the Eastern Solent Coastal Partnership (ESCP) highlighted the following risks associated with the impact of surface water in the field and flooding/erosion of the Refuge/SuDs in the northern part of the field:
 - a. Surface Water Management.** This winter the south and north sections of the field have been subject to marked areas of standing water. Recently an agricultural vehicle got badly bogged down around the perimeter of the field. Any surface water drainage

system would drain into either the existing wastewater network or into Langstone Harbour. There is serious concern that Southern Water has recently underperformed on Hayling Island regarding wastewater management, indicating that the current system is already overloaded and not fit for purpose (see para 4a). Any release into Langstone harbour could potentially cause harmful pollution affecting the harbour environment and the “blue flag” status on nearby West Beach.

- b. **Coastal Flooding and Erosion.** There is no flood plan strategy for Hayling Island. In the Coastal Management scheme, the subject coastal strip field will not be a priority for allocation of funds to protect from flooding and erosion i.e. it is not sustainable for perpetuity. The predicted sea level rise of 0.83m, even with the effect of low pressure, spring tides and storm cluster over the next 50-100 years, will seriously affect the efficiency of the SuDs or other drainage methods. This winter alone the western edge of H34C has been subjected to visible erosion, up to a metre inland in places. The responsibility for defending the H34C field facing Langstone Harbour against flooding and erosion is currently with the land owner. This responsibility will transfer to a developer if planning was approved and thence to residents for future management in perpetuity, an issue not clearly addressed in the application.

Any housing development on the Sinah Lane site would exacerbate the above problems, with no guarantees of a lifetime management plan for the protection of this development and existing residences on North Shore Road.

3. Traffic.

- a. **Traffic Assessment Review.** In a letter to Residents dated 18 June 2018, Barratts advised that an application would not be submitted until issuance of the HI Highways and Transport Infrastructure Assessment. This was clearly not the case! **As the Traffic Assessment under the Local Plan is under review, it is requested that HBC Planning give a positive assurance that the subject application will not be considered until the Traffic Assessment is completed.** Also, that the previous and any recent comments, and any supplementary surveys, are fully taken into consideration.
- b. **Sinah Lane traffic and single entrance to Site.** It is requested that the Traffic Assessment includes traffic recording results at the west end of Sinah Lane. A traffic accident occurred opposite the Sinah Lane access, caused by poor visibility looking into low early morning sun. This highlights the dangers associated with vehicles exiting and accessing the site and traffic on Sinah Lane, especially in low sun “dazzling” conditions.

4. Utilities.

There are two current issues on Hayling Island which involve Southern Water, namely sewage/wastewater management and water pressure.

- a. **Wastewater/Sewage.** There have been several instances of drains overflowing with raw sewage on public thoroughfares throughout the island. Also, the well publicised failure of pumps has caused major pollution problems into fields, ditches and Langstone Harbour during this winter.
- b. **Water Pressure.** Low water pressure continues to be a problem, certainly at the southern end of the island.

Despite Southern Water's protestations these are serious on-going problems which will need to be fixed before any more development is approved.

5. The "Oysters" Development. This Barratts' development to the north of Station Road, now under the management of the residents, has the following issues raised during the subject period:

- a. **Mitigation.** The issue of protecting the nearby habitat of wintering Brent Geese was not addressed by the developer until 4 years after the start of development, and then only minimal action has been taken. This had not been followed up by the HBC Planning department during the period of development.
- b. **Resident Issues.** Issues raised by current residents of the "Oysters" include:
 1. **Parking.** There are no visitors parking slots on the site. Also, too few houses have garages and rely on side by side or tandem parking for 2 cars even though some households have 3 cars. This results in cars and vans being parked on the road and pavements, which could cause problems for delivery lorries or emergency vehicles accessing the site. Recent approaches about lack of parking by the Residents Management Committee to Barratt's, the previous management company and HBC have met with "not our problem" responses.
 2. **Pavements.** There is not paving all the way round the estate. In places it is either on one side or the other, with parts stopping to grass, then back to paving. This causes pedestrians, especially ones with family, to keep having to cross the road and is a potential safety hazard.

The mitigation issue brings into question the credibility of Barratts as a responsible developer. Residents' comments highlight some of the shortcomings of Barratts site planning on even quite small residential estates. A review of the Sinah Lane development shows similar shortcomings to those experienced at the much smaller development above.

In summary, we have been advised that some of the current issues highlighted above are already in hand. However, we still have grave concerns about any development on the site to the north of Sinah Lane whether it is under the current application or in the future under the HBC Local Plan 2036. It is strongly urged that HBC Planning Dept takes into account the large number of previous comments on the subject application, any additional comments and those raised in the relevant responses to the HBC Local Plan 2036. We believe that there is sufficient evidence to show that this application should be refused and that our comments are placed on record.

Yours sincerely

