

General

This revised submission by Barratt Homes includes more detail in respect of the proposed site for development however fails to address or resolve in any substantive way the critical infrastructure and environmental issues raised as part of public consultation in August 2018. The revised plans also ignore the outstanding issues surrounding the adoption of the local plan by HBC and in particular the concerns raised which resulted in adoption of the 'Satchwell amendment', which addresses the councils concerns regarding the increase in traffic congestion in Hayling Island, Havant and the A27.

In addition the Barrett homes latest compliance document states that this will support delivery of environmental, economic and social development as defined by NPPF however it can be shown that this is at best a 'rose tinted' view by the developer which ignores the real consequences on communities across SE Hampshire.

It is likely that this development will exacerbate the current traffic congestion in SE Hampshire

Barrett have promoted the site location as having good access to public transport and major road links however they have not included any meaningful data about the effect an additional 1000 plus daily vehicle transits of the A3023 will have on the already overloaded local road network. Before giving this proposal the go ahead HBC should properly quantify what the current and future cost of traffic congestion will have on the economy of SE Hampshire, as Hayling Island is the catalyst for severe regional traffic congestion that spills over onto the mainland also. Only once these figures are properly captured can the economic and social benefit (or not) of a new development in field H34C be quantified.

An example of the cost of congestion on the local economy .

The direct cost to commuters suffering in congestion is in the region of £7.5 per vehicle per hour. (source INRIX). The recent traffic congestion as a result of the burst water main highlights the issue. Taking the 25000 vehicles which cross the Hayling bridge every day and assuming they experienced an average delay of 3 hours (more likely figure is 5 hours) the cost to the island economy was £562,000. If the consequences of the consequential congestion to mainland traffic and A27 corridor (see congestion map below) is added then the real cost of this one event was almost certainly in excess of £1,000,000 over the period of the event. This doesn't take into account additional cost to local businesses and emergency services. If the A3023 is currently at capacity then the likelihood of this new development having a disproportionate effect on increasing the occurrence of traffic gridlock is high and should be assessed, quantified and offset against the claimed benefits to the local economy which are stated in Barrett's own figures as £1.1 million annual local spend by residents and £295K of council tax.*



Consequential congestion in SE Hampshire during the water main incident. This new development will increase risk of reoccurrence as the already over stretched road capacity is put under further pressure.

*excluding one off cost benefits during the construction phase.

Only once these figures are available to HBC can the real economic credit or deficit of this new potential development be quantified and the suitability of this as a development site be ascertained. The transport assessment published in January 2019 offers some mitigation for an increase in traffic but is currently unfunded and the proposed actions will take many years to set in motion and there is a great deal of documented argument already that the assessment assumptions are deeply flawed.

Consequences of A3023 traffic congestion on the Havant Economy.

The reality for residents in the Borough of Havant and local businesses (especially in Solent Road) is that any minor traffic distraction on the A3023 is having a major effect on congestion in Havant and beyond. The photos below show the direct consequences on Havant due to traffic slowing down during the annual Ship Inn raft race at Langstone. Time 1512 on the 20th July. The main Hayling roundabout was gridlocked thereby locking up the southbound traffic in the town and causing dangerous queues out onto the A27 main carriageways . The Solent road shopping centre carpark was half empty as a consequence.



Why is this relevant to this new development?

It is relevant because neither the Hayling Island transport review nor this application by Barrett Homes for the development can quantify how much worse the traffic will become if additional large developments on the Island go ahead without associated major investment in the road network to mitigate the resulting growth in traffic. Without multiple routes onto the Island these issues will never be properly resolved.

Isolation of this development from most public transport infrastructure

The maps submitted with the Barrett proposal as examples of public transport cannot hide the reality that the public transport links available for this development are not convenient or readily accessible especially during rush hour. The developers own data indicates that the take up in the use of public transport is likely to be small therefore resulting in an additional 800 to 1000 vehicle transits of the A3023 per day.

The developer has highlighted that alternatives include the Billy Trail cycle route and ferry however due to lack of investment on the part of HBC these are impractical commuter options especially in the winter periods.

This development is 7km from any main public transport infrastructure and the new residents, if it goes ahead, will exacerbate the traffic congestion to the mainland. Barrett's own figures at best indicate it will only create 12 new jobs on the island and 78% of car journeys will be 'over the bridge'



Effect of this development on the environment.

Barrett's claim that this development will offer a net gain in Biodiversity. Yet again Barrett's have made this statement based on no substantial evidence. Their own environmental consultants have included the following statement to absolve themselves from the liability for any statements and claims made in the submission. This being the case how can HBC have any confidence in the efficacy of the document submitted by Barrett's in the first place.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. WYG accept no liability for issues with performance arising from such factors.

What this means is that the proposed mitigation regarding the environment that WYG have proposed and in particular the suitability of the site for migratory birds is at best questionable and written to fit the rules and not reality.

No acknowledgement or apology from Barrett homes regarding their failure to meet past environmental commitments associate with the Oysters development.

Barrett Homes have been conspicuously silent on their past failures to meet there environmental commitments as part of the adjacent Oysters development migratory bird mitigation. An open and honest acceptance of responsibility for their botched attempt to belatedly secure the Billy Trail boundary and commitment to do better in future may increase residents confidence that the environmental mitigation proposed on this occasion is more than a paper exercise.

Migratory Bird refuge proposal discrepancies.

Field H34C is now regarded as a primary site for Brent Geese due the observations and bird counts undertaken over the winter of 2017/8 when the field was planted with a foraging crop which is attractive to this protected species. This reflects much greater use of H34C by the geese than the figures stated in reports commissioned by Barratt homes in support of the recent planning application (AP-18 00724). Bird numbers and areas of the field used for foraging would have been further enhanced if Barratt Homes had not ignored the obligations they made when securing approval for the Oysters Development in 2013.

A detailed analysis of the Barratt Homes Oysters Brent Geese Mitigation prepared by Tyler Grange (TG Doc) in 2013 and the subsequent 'Winter Bird Mitigation Strategy' also submitted by Barratt Homes in August 2018/19 (prepared by WYG) confirm the current proposal submitted by the same developer to build on H34C fails to come close to meeting the requirement under the NPPF to enhance biodiversity as part of any new development.

Meetings with HBC planning team capture and confirm a catalogue of failures by Barratt Homes to meet its commitments under the Brent Geese Mitigation associated with the Oysters development. Subsequent scrutiny of the later WYG Brent Geese Refuge proposal submitted in August 2018 clearly shows that although the previous Tyler Grange document had been reviewed as part of that later submission, key elements of the document that contradicted or would have been detrimental to the new proposal had been omitted or ignored.

These are.

- The TG doc clearly highlighted that the Northern end of H34C (0.7ha) was unlikely to be attractive to Brent Geese because of the close proximity of the path on both sides. This is a significant part of the newly proposed Brent Geese refuge in the WYG Proposal.
- The TG doc clearly shows that the southern and central areas of H34C would be enhanced to mitigate the loss of habitat due to the Oysters development. In the WYG document this is the proposed area for the new development (AP-18 00724) with a Brent Geese refuge squashed into a smaller area, part of which had been previously deemed unattractive to Brent Geese in the previous TG doc
- The WYG doc acknowledges that Brent Geese are very sensitive to disturbance but fails to give firm understanding about what the level of this would be if the development goes ahead and lacks detail how this can be mitigated in a reduced northern area. It also fails to consider published studies on the reliance of sight lines by Brent Geese to detect potential threats when foraging. The latest WYG documentation proposes disturbance noise below 69db but also then casts doubt on the developers ability to achieve these levels in the liability disclaimer.
- The TG doc clearly states that the mitigation will only be effective if the Hayling Billy Boundary (HBB) was secured to prevent loose dogs disturbing the geese. Barratt undertook

the overdue boundary work on the HBB in the summer of 2018 (4 years late). The fence was poorly installed, totally ineffective in deterring loose dogs and not overseen by HBC. After only a few days the poorly installed boundary was removed or breached presumably by walkers looking for a shortcut between the HBB and the foreshore. Offices of HBC planning team confirmed that the installation was unsatisfactory, unacceptably late and that HBC enforcement had not picked up on the issue until it was highlighted by residents. HBC confirmed the enforcement team would be tasked to rectify the situation in November 2018 however at the time of writing there are some fences in place but the boundary is still far from secure which was the only objective of the mitigation in the first place.

- The WYG document commissioned by Barratt stated that the work to secure the boundary was complete which is incorrect. It went on to confidently state Brent Geese population numbers for the previous 3 to 4 years when it was clear these figures had almost certainly been skewed lower by the lack of a secure boundary. WYG also stated that their own observers had seen loose dogs in H34C during their limited observation periods.
- The WYG document states it is looking at best to offset adverse effects of the new development but didn't state it will enhance biodiversity which is a requirement under NPPF. It also stated that reducing the available field area by two thirds in H34C would sustain same the same population of Brent Geese. No third party independent verification of this evidence was offered to support this assumption although WYG continue to reference discussions with RSPB as 'in consultation with'.
- The partial planting of the field over the period 2018/19 (only in the Northern sector) could be interpreted as a cynical strategy to further support the argument that Brent Geese do not use the southern end of the field, which will be the case this year as there is no foraging habitat. That said the use of the Northern end of the field in 2018/19 by Brent geese has been lower than previous years implying that the area for the proposed refuge may in isolation be unattractive to Brent geese especially as there preferred food source is arable crops not grass/marsh land. All of H34C is a primary site for up to 1000 geese however this year the unilateral decision to not plant part of the field has detrimentally affected the use by Brent Geese of this primary site. When this was discussed with HBC planning team by residents it was clear they had no knowledge of this years modified planting regime.
- The current proposed financial provision for the Brent geese refuge fails to allow any funds for coastal erosion. It is inconceivable that this will not become a factor for the proposed refuge area going forward and should be provisioned in the funding. The statement below issued by the National Infrastructure Assessment on 9th May 2019 highlights why the current proposal for development of this site is *inadequate and out of date*.

"The Environment Agency has today begun consulting on the national flood and coastal erosion risk management strategy for England proposing a new approach based on a recommendation made in the National Infrastructure Assessment.

The Agency's strategy will ensure the country is prepared for a potential 4° C rise in global temperatures and aims to ensure all infrastructure is resilient to flooding and coastal change by 2050.

With over five million homes in England at risk of flooding and coastal erosion, the strategy says more should be done to help home owners recover from flooding, including through encouraging home improvements to make dwellings more resilient. It also proposes giving communities a range of tools to give them greater control over how they prepare for, and respond to, flooding and coastal change.

The National Infrastructure Assessment, published in July, highlighted the growing threat from flooding and coastal erosion. It recommended a national standard should be set for resilience to flooding with an annual

likelihood of 0.5 per cent by 2050, where feasible – an even higher standard of 0.1 per cent was proposed for more densely populated areas – along with a rolling six year funding programme.

The Assessment called on the Environment Agency to update its plans for all coastal areas in England by the end of 2023, in order to show how risk can be better managed for a range of scenarios and to encourage appropriate interventions. It also recommended that planning authorities should ensure all new development is resilient to flooding at this new national standard for its lifetime and does not increase risk elsewhere."

Changes to the development proposal since the previous submission by Barrett Homes that raises new concerns.

- The proposed site boundary fence is inadequate especially as an acoustic barrier for properties adjacent to the entrance.
- The new proposal introduces 3 storey properties which are at odds with the local housing style and character. This contradicts Barrett's statement in 5b of the amended design submission which states that building heights will reflect the current neighbourhood. Developers own SWOT also highlights that the 3 storeys is an issue.
- The development entrance and proposed adjacent pedestrian crossing incurs low sun blind spots in spring and autumn that have caused accidents. Planning department are aware however no mitigation offered. This is a major safety issue.
- Proposed turn in at entrance very close to the boundary of 10 Sinah Lane
- Developers economic benefits statement totally ignores the consequences of increased congestion that will result if this development goes ahead.
- The claim that the wader and Brent geese refuge meets HBC requirements is questionable especially as not supported by independent protection bodies such as RSPB
- Future coastal erosion damage to the area allocated for the migratory bird refuge ignored.



5th August 2019