

Objection to Planning Application 20/01093.
195 homes to be built on land north of Sinah Lane, Hayling Island.
On behalf of Havant Friends of the Earth and Havant Climate Alliance.

This application should not receive planning permission on the following environmental grounds:

1. Reduction of foraging for Brent Geese and Waders

WYG state that “using a precautionary approach *there are likely significant effects on SPA and Ramsar sites*” but taking account of embedded mitigation “*there will not be significant effects*”. We question whether the proposed mitigation will be sufficient. This development will add to the incremental loss of SPA supporting sites on Hayling Island and across the Solent. This arable site provides valuable winter foraging for Brent Geese and Waders at high tide, adjacent to Langstone Harbour. It is noted that a Habitats Regulations Assessment has not been carried out.

The proposal to turn the land to the north of site into a Nature Reserve managed by the RSPB is desirable if the development goes ahead, but will not adequately compensate. We do not think that Bird Aware can provide adequate recreational mitigation for building on or beside land previously used by birds. The encroachment of habitation in itself will be a deterrent for many birds, even if local residents have been educated about them.

2. Water Quality/Nutrient Neutrality

By Natural England methodology, this development will result in a Nutrient Reduction, improving water quality, although we would like physical evidence, of the nutrient levels in the field. The WYG assessment has not factored in the RSPB proposal to apply 50 – 70 kg fertiliser (per hectare or field?) to the nature reserve in autumn, nor the impact of grazing animals if used. Natural England say that livestock numbers should not exceed 1 animal per 10 hectares.

Any reduction of nutrients leaching from the land, must be considered against the increase in sewage going to Budds Farm which will result in more frequent storm water discharges which will be detrimental to water quality. Natural England methodology does not cover this. We remain concerned that the development will reduce water quality overall and damage our seagrass beds, which are vital in combatting climate change.

3. Loss of productive farm land

The agricultural land on this site is classified as grade 3a which falls within the category of “Best and Most Versatile” for agriculture. Land of this quality is very limited in the UK, so this site should remain in production, especially in relation to Brexit and the need for food security.

4. Increase in Traffic Congestion/Decrease in Air Quality

It is inevitable that any increase in population of the Island will increase traffic delays on the only access road, the A3023, which already suffers from frequent

congestion. This will result in an increase of air pollution for those living near the road.

If the development is given permission, there should be a commitment to providing a net gain in biodiversity, and the following conditions should apply:

5. Trees and hedges

We need to increase tree cover to support carbon reduction and biodiversity. Developers should follow advice from WYG that existing hedgerows should be infilled with more species rich planting. They also advise new hedging and native trees along the northern edge of the site to increase screening for the Nature Reserve.

We think there should be additional planting of hedges and trees around the west and southern boundaries of the site, as well as more tree and hedge planting within the built site (not just scattered trees and shrubs as WYG suggest). This will improve opportunities for Wildlife Corridors around and across the site. Homes should not be built too close to trees causing pressure to prune.

6. Grassland and wildflowers

To enhance biodiversity, we agree with WYG advice that existing areas of grassland along the western boundary should be retained and allowed to grow, to provide foraging for various species. This should include additional underplanting of hedgerows where needed. We also support proposals for species rich planting of new grassland areas.

7. Long Term Management

We support Natural England's preference for the land ownership of the proposed Nature Reserve to be transferred to the RSPB, rather than held on long lease. We agree with WYG advice that the site should be prepared for overwintering birds, before any building work commences and that noisy work should be avoided between October and March.

WYG proposes various management schedules to maintain trees, hedgerows, vegetation and grass on and around the development site. Long term management plans need to be in place: to water young trees and hedging shrubs, and replace them if they fail. Hedges will need pruning every 2 years. Grass should be allowed to grow, but will need annual cutting. Attenuation ponds and their vegetation will need monitoring. A long term Management Plan will be needed with clearly designated responsibilities.

8. Wildlife Corridors and Enhancements

More trees, hedgerows and areas of vegetation are needed to provide wildlife corridors around and through the site. Fences should have ground level holes to allow small mammals such as hedgehogs, to travel through. WYG advice should be followed to provide a variety of bird nesting boxes, as well as bat boxes, attached to houses and large trees. Bat friendly street lighting is essential.

9. Birds, Bats, Reptiles and Badgers

WYG have updated their reports to 2020, but have not carried out actual field surveys since 2017/2018. They state that this is not necessary because the “development proposals for the main site remain unchanged”, and there is “no change to the conditions on site”. However we think that updated field surveys are needed, as many factors can cause change in species numbers. We agree that checks for badger setts should be carried out shortly before construction work commences. We also support Natural England’s advice that a condition of planning permission should be that they visit the site and sign it off prior to construction work starting.

10. Building for a low carbon future

Some of Barratt Homes “fabric first” approach is good, i.e. better insulation, and waste water heat recovery, but it will only partially meet the Council’s emerging policy E12 for Low Carbon Design. Barratt will install condensing gas boilers although these will be banned from new build homes from 2025. Solar PV with appropriate positioning of buildings, or heat pumps should be installed, as this can be done more cheaply during construction, compared to retrofitting later.

11. Affordable Housing

In view of the large number of people on the housing waiting list, the percentage of houses designated for affordable rent should be increased to at least 40%.

12. Encouraging cycling

It is positive that all properties will have cycle stores as well as bin stores. There is no information about the size of the stores and it is important that these are secure and have sufficient space to store 3 to 4 bikes. If there is to be only one access point onto the Hayling Billy Trail, it should be at the northern end of the site, so that cyclists are not deterred by having to go “a long way round” to reach it. The developer should make a contribution to improvement of the Trail surface.

13. EV charging points

Plans show that only houses with garages have these. They should be available by all parking spaces to encourage future transfer to electric vehicles.

