

Hearing Statement on Matter 5

Submitted by Rosie Law, local resident, on behalf of swhayling group

5.10 The approach to the Site Selection Topic Paper states that a planning application had been submitted and was due to be considered at Development Management Committee on 10 March 2021. Has that application now been determined?

No this was an advisory meeting and subject now to another Stage 2 complaint and being progressed to The Ombudsman due to lack of response within the request for extension of time.

5.11 The Topic Paper also states that a recent planning application at this site for housing development was subject to an appeal against non-determination. Has this appeal been determined?

No it has been put on hold. We believe Barratt Homes are covering all options and awaiting the result of the 2020 application.

5.12 Does this site form part of a mitigation scheme for a previously approved development at the Oysters? If so, would this affect the delivery of this allocation?

Yes: Even when it was thought that H34C was a PSA, there was still no confirmation in either application on this site that additional land would be used to replace the 12.4 hectares of land lost to development from H34C which is already in mitigation and replacement of land lost to the Oysters Development.

The new onsite refuge will only be 5.7 hectares.

When residents argued against the use of this site for development, knowing it should still be protected even as a PSA, the counter arguments presented by HBC included belief that the Geese only used the northern part of the field and therefore an 'enhanced' but smaller replacement refuge, available every year and protected from disturbance, would be adequate mitigation for the loss of the PSA. However, this proposed replacement refuge is located right next to the proposed new housing estate and huge drainage attenuation basin. This would destroy the previous flat and open landscape required by the birds and the noise of a housing estate be very likely to add to disturbance, not enhance attraction as required by the existing the Tyler Grange mitigation for H34C.

Enforcement of previous mitigation which is meant to be secured for the duration of previous development of the Oysters in 2015 has not occurred '*in order to ensure that the compensatory measures (including crop rotation and fence repair) are secured for the duration of the development (I e in perpetuity)*' (Tyler Grange 11th Sept 2013, Land off Station Road, Hayling Island, Brent Goose Strategy. Section 3: Management and Monitoring Plan 3.1). Annual systematic checks and repair to fencing have not be carried out in September prior to the over wintering season for Brent Geese. **Crop rotation for H34D and the whole of H34C were meant to remain in line with usual farming practice and cereals grown on alternate years.** The Tyler Grange report explains that H34D was used by horses and not used Brent Geese but needed to be enhanced to partly compensate for the Oysters along with the certainty of H34C which is used by Brent

Geese. As such both fields are needed to remain fully farmed with in standard crop rotation and part of a larger plan for crop rotation for other fields in this area of Hayling Island. Hence winter wheat, the favourite cereal crop for Brent Geese would always be grown somewhere.

It is highly significant that now, as a CSA, the replacement onsite refuge is neither adequate nor suitable mitigation as any replacement site should be, ***'Of an equal, or in some circumstances greater, size and quality.'*** Clearly this is NOT the case and the HIBR is unsuitable and vulnerable as stated in Matter 4

5.13 Have other constraints to development and the implications for infrastructure been properly assessed and, where necessary, can appropriate mitigation be achieved?

NO and UNPROVEN: Due to the preparation for the applications on the site we know that complex constraints and additional conditions would be needed in addition to the drainage plan using unproven SUDs. Southern Water have refused to manage the surface water drainage part of the SUDs due to lack of reliability and this would be left to a management company funded by the new residents.

The site suffers from severe surface water flooding regularly and at least every winter, exacerbated with increased and more intense rainfall associated with Climate Change. Even this today's very heavy rain has caused flooding in the neighbouring gardens. This is made worse by the existence of a 'groundwater bulge' only 45cm from the surface in places and sits above the layer of London Clay.

The geo-hydrological process of TIDELOCKING causes the groundwater to rise and fall due to the accumulated pressure on the groundwater from the tidal movements in Langstone Harbour. The concerns that the groundwater could rise to the surface and mix with the surface water at the lower channel of the proposed solution of a very large and raised SUDs attenuation pond has been raised by the Local Flood Authority who have very recently recommended a Condition to line the basin.

Input from Developers' engineers at the 10th March 2021 meeting still did not address concerns and questions being raised by residents. He claimed the location of the site was too far inland for any change in groundwater level to be affected by tidelocking. No account was taken of the location of our own garden where we have actually seen this process in action. As our soak away is only a few meters away from the site's southern boundary and more than half-way along the boundary travelling eastwards, we remain genuinely concerned that the affects of this rise and fall of groundwater levels needs further investigation. It is clear that this complex physical process is not understood yet can cause many issues for new developments.

Only 2 of the 6 bore-holes for 2016-17 groundwater survey data have been working and the results of the replacement bore-holes, this winter, are being chased by LLFA to ascertain accurate groundwater levels.

The forecasted rise in tidal height is 1.4m in 100 year lifetime; the groundwater levels will rise proportionately.

SuDS calculations on flow rate and volume relate to surface water but the rising level of groundwater over the development's life-time needs to be included in this modelling.

Another condition has been added to ensure that swales are included in any development backing onto the existing houses whose gardens also suffer from the same surface water and groundwater issues. These gardens, to the south and west of the site, already flood and drain northwards and eastwards, respectively, into the field. Any development MUST NOT exacerbate the flooding and drainage issues already existing on Hayling. The issues Hayling already is having with increasingly frequent sewage and water main bursts is clear evidence of inadequate, old and over stretched drainage and water supply infrastructure which is affected by movement of groundwater, held in the sediments just below the surface, in the winter. Such events in the locality of the H29 site occurred several times last winter. Flooding on Hayling is NOT JUST about coastal flooding. The low lying coastal area with unseen but ever present groundwater, secondary aquifers and severe surface water flooding, surrounded by tidal waters creates many more risks and constraints for the sustainability and viability of new development in perpetuity. Much more importance and scrutiny is needed to ensure such development is appropriate, let alone in combination with existing and highly significant environmental and conservation constraints

Barratt Homes plan for waste water at 110 litres per person/day is nearly 60% less than average for this area. Southern Water explains 265 litres pp/day passes through Budds Farm including 3% sewage. This unrealistic target distorts calculations for nutrient neutrality, mains and waste water new provision and will affect infrastructure in the area. The sewage will still be there but in a more concentrated form. How can reducing water going into a home, reduce the sewage produced?

Despite Climate Change mitigation in this proposal, if the attenuation pond were to be overwhelmed, there is still a risk that untreated old pollutants, fertilizer which has been held undisturbed in the groundwater for at least decades, could then overflow through an existing network of old field drainage ditches a natural ancient pond on the northern border of the site, through the protected habitat of the Salt Marsh and into Langstone Harbour. In addition the proposal to create a replacement refuge using mono-cropping will require extra use of fertilizers and pesticides to establish the mono crop. The run-off from this will go directly to Langstone Harbour increasing the nutrient load and not offset the issue at all. It will also destroy the very biodiversity it aims to establish! This would disturb the nutrient balance in the harbour, already suffering from eutrophication and under threat by the raw sewage, containing dangerous pathogens mixed with surface water and discharged almost continuously this winter by Southern Water. This has caused major concern to Natural England in their recent report regarding the ecological state of Chichester Harbour, connected to Langstone Harbour, along with the safety of bathing and recreational waters. Ref concerns Matter 4, 4.18.

The local residents are asking for improved bat survey as there is noticeable bat activity and a commuting route across the field between the fully grown trees surrounding the field. Bechstein's Bat is found in the Havant Borough and may well be on Hayling too.

At the time of writing there is an ongoing reptile and archaeological survey taking place, commissioned by Barratt Homes. We have first hand evidence of populations of Slow Worms using the existing adjacent gardens along with Frogs and the Smooth Newt and Stag Beetles. There are many varieties of butterfly which enjoy the wild hedgerows. The field supports birds of prey eg: Sparrow Hawk, Red Kite, Honey Buzzard and even a sighting of an Osprey which hunt the small mammals that live in the field eg mice. As an important ecosystem supporting apex predators, this field should not be destroyed but is ideal for saving and utilising for net gain biodiversity as well as remaining a Core Site for the Brent Geese and Waders. It forms part of the wild life corridors crossing Hayling enjoyed by Rowe Deer and other fauna.

Hayling Island was important in Roman and Saxon times so there is definitely potential for important archaeological artefacts.