Aerial View of Hayling Island Hampshire

A letter to the Rt Hon Robert Jenrick MP

Secretary of State for Housing, Communities
and Local Government

THIS IS AN APPEAL BY HAYLING ISLAND INFRASTRUCTURE ADVISORY GROUP MEMBERS ON BEHALF OF THE HAYLING ISLAND HAMPSHIRE RESIDENTS TO THE SECRETARY OF STATE TO REVIEW THE DEVELOPMENT PROJECTS AND HAVANT BOROUGH COUNCIL'S LOCAL PLAN, AND THEIR IMPACT ON THE HAYLING ISLAND COMMUNITY

The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities
and Local Government
House of Commons
London SW1A 0AA
By email robert.jenrick.mp@parliament.uk
Confirmed by post

DG Parham
45 St Thomas Avenue
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24 November 2020

Dear Mr Jenrick

We, the undersigned Hayling Island Infrastructure Advisory Group (HIIAG) members, are writing to you on behalf of the residents of Hayling Island (HI.)

We know that your Ministry believes in and encourages true consultation with communities regarding developments in their area. Therefore, we believe you will be very concerned to learn that the residents of our small and vulnerable island are being increasingly disenfranchised. This is because the structures and processes agreed between the key stakeholders and Havant Borough Council (HBC), designed to ensure participation in all elements and stages of the Local Plan infrastructure, have not been upheld by HBC. This has resulted in decisions being made without the residents' understanding or involvement.

It should be noted that HIIAG, since its inception, has worked constructively with HBC, and has achieved some notable improvements, particularly in the areas of the wastewater network and primary care – proving that the model can work for all stakeholders.

This is not now the case, as HIIAG was only convened three times in 2019, and not at all since November 2019. Therefore, true consultations to ensure that responses and advice from HIIAG are openly debated have not happened, and we may well have missed the opportunity to prevent irreversible mistakes being made.

There is now a real fear that the residents, through their representatives, are losing the ability to influence their community's wellbeing and future. This worrying situation is explained more fully in the detailed report starting on page 4.

The infrastructure planning for Hayling Island is still in full swing, and the involvement of HIIAG must be seen as essential. The areas include:

- Hayling Seafront Regeneration
- Coastal Partners' Hayling Island Coastal Strategy
- Surface water flood risk
- Local Plan housing allocation sites' infrastructure reviews
- A3023/bridge flow/capacity resolution

We have been forced to take up this matter with you because the residents' representatives and independent counsel have been ignored by HBC. This situation can only be resolved with a rigorous science-based appraisal of the

A3023/bridge and an acceptance of the flood risk strategy resolution due from Coastal Partners in 2022.

This is a vulnerable community asking for an independent evaluation of their situation and future as proposed by HBC in the Local Plan. As the residents' representatives, we are doing our best, but we are not being facilitated as per the HIIAG Terms of Reference (see Appendix 1) to discharge our duty to the community and do the job expected of us.

A huge amount of effort has gone into working for the Hayling Island Community over the past three years. Unfortunately, our involvement has too often amounted to a superficial one, making many participants feel that they were a 'tick box exercise' just to satisfy the NPPF requirements for consultations.

We know that engaging with the Community is something you believe in and would advocate as good practice, so we ask for your support in addressing the concerns in this document.

Yours sincerely

Joint signatories:

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APPENDIX 1 2 pages
Hayling Island Infrastructure Advisory Committee Terms of Reference – page 1 & 2

APPENDIX 2 2 pages
Letter from Dave Parham to Michael Wilson, Hayling Island Infrastructure Advisory Group Chair, on the role of this Committee, dated 9 April 2018

APPENDIX 3 9 pages
Save Our Island's Review of Hayling Island Transport Assessment Addendum, dated November 2019

APPENDIX 4 5 pages
Group letter of complaint from the Non-Aligned members of the Hayling Island Infrastructure Advisory Group to Council Leader Michael Wilson dated 8 April 2020 regarding the Hayling Island Transport Assessment Addendum

APPENDIX 5 5 pages
Letter of complaint from Rosie Law (SWHayling resident) to HBC regarding factual inaccuracies within the DMC presentation on the Sinah Lane site, dated 13 November 2020

APPENDIX 6 6 pages
Rosie Law's explanation of Tide Locking and Recent SuDS Changes on the Sinah Lane site

APPENDIX 7 3 pages
Letter of complaint from Anne Skennerton (Hayling Island Residents' Association Chair) to Alan Mak MP regarding the Indicative HBC DMC Meeting, dated 13 November 2020

THIS IS AN APPEAL BY HAYLING ISLAND INFRASTRUCTURE ADVISORY GROUP MEMBERS ON BEHALF OF THE HAYLING ISLAND RESIDENTS TO THE SECRETARY OF STATE TO REVIEW THE DEVELOPMENT PROJECTS AND HAVANT BOROUGH COUNCIL'S LOCAL PLAN, AND THEIR IMPACT ON THE HAYLING ISLAND COMMUNITY

In 2013, the Inspector commented on the Local Plan saying:

> *"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". [Extract from paragraph 9 of the Inspector's Report].* [1]

This statement remains just as true today.

It would be wrong of us not the recognise the weight of pressure on HBC to build more and more houses. Havant Town, like many in the country, is struggling with regeneration. Many retail outlets are being boarded up, with shopfronts painted to hide the desolation within. HBC are now beginning to buy up town centre properties for redevelopment, but trying to corral the many absentee landlords to agree a regeneration strategy must be a bit like herding cats. The first high rise development opportunity has not received any developer interest at the time of writing.

There are also many opportunities for sustainable infill in the existing developments, but this, of course, requires much more work from HBC and developers to achieve.

On Hayling Island, windfall has always been the major development category, including assisted-living complexes and affordable housing. These will continue, together with the proposed Seafront regeneration projects.

However, we question the validity of allocating large tracts of profitable farmland to the big developers to construct out-of-context high-density housing dormitories, constructed on legal minimums and ignoring Government recommendations, i.e. mature tree planting, low-cost energy systems, electric car charging for all.

The dormitories add additional strain on the already stressed Hayling Island infrastructure, including roads, schools, primary care and emergency services – with little or no benefit being added to the Island's economy.

We do understand the attraction of this kind of development, given the massive amounts of cash sloshing around these projects for Councils and developers alike, but this should not be the determining factor in every case.

Since 2013, the net housing increase on Hayling Island, including outstanding applications with planning permission as of April 2020, is 503 units.

In addition, housing allocations in the Local Plan rose from 660 to over 1100.

[1] https://www.havant.gov.uk/sites/default/files/documents/Windfall%20Background%20Paper%202013.pdf

In 2017 it was agreed – because of the unique issues and constraints impacting the Island – that all infrastructure planning should cover the whole Island. At that time, HBC set up HIIAG to advise on all aspects of the Island's infrastructure. There are no other islands in Britain that share the characteristics and limitations of Hayling.

The Island is serviced by a single-access route. The A3023/bridge route is a single carriageway rated as S2 3rd Class. This is effectively a country lane. In addition, there are no alternate routes, and there are no economic options to expand its capacity. Therefore, it remains as the key infrastructure constraint for the Island.

Hayling Island is a low-lying T-shaped Island approx. 4 miles north to south, and 4 miles east to west across the southern cross of the T, with a Blue Flag Beach the width of the south coast. The population of approx. 17,500 has a high percentage of elderly/retired residents. There is little industry present or proposed, and working age residents must commute daily to their place of work on the mainland. The Island plays a very important environmental role, surrounded as it is by Langstone and Chichester Harbours, internationally recognised for conservation and playing an important role on the Solent Special Protection Area for protected species of birds, especially Dark Bellied Brent Geese and Waders. There are nature reserves on both sides of the Island and extensive areas of SSSI.

The Island is best characterised as a leisure destination with its 3 marinas, 3 sailing clubs, 3 holiday resorts, 3 golf courses, a tennis club providing 5 different racquet sports, the Hayling Billy Leisure Trail linking cycle routes to Havant, and 2300 mobile (second) homes. The population of the Island is estimated by HBC to increase 25% in the summer months.

In addition, it offers a safe, accessible south-facing Blue Flag bathing beach, fun fair, miniature railway, and is an internationally important windsurfing and kitesurfing centre. At the west end at Langstone Harbour, there are noisy water sport areas for jet skis and water skiing etc. And a very popular element of the national cycle route runs round the Island which is linked to Portsmouth via a foot passenger ferry.

The historic and natural role of the Island is recognised, and HBC have significant plans to improve and expand leisure opportunities for the benefit of the residents of the whole Borough.

Therefore, it came as a surprise when HBC chose to add the dimension of becoming a housing dormitory for the economy of the mainland, placing an even heavier responsibility on HBC to ensure we have a long-term sustainable infrastructure which is understandable to all and covers all aspects of the Island's needs.

There is no denying the need for housing. What we are asking for is that the quantity and type proposed for Hayling Island is both appropriate and sustainable.

It is the HBC Infrastructure Plan, including the Hayling Island Transport Assessment (TA), which in our view remains deficient, and requires a forensic analysis in line with the considered view of the Inspector in 2013.

The TA was initiated in 2017 and sub-contracted to SYSTRA. It was the intention and promise of HBC to include HIIAG (including Hayling Island Councillors) at every

stage, including the key areas of parameter-setting and modelling processes, which including modelling education for the HIIAG members. HIIAG and HI Councillors were excluded from this process, despite their many requests. On its completion, the TA was rejected by the full Council, and through the Satchwell Amendment, a TA Addendum was commissioned. Prior to the publication of the Addendum, we presented our concerns to the Council Leader. See Appendix 2. This project was undertaken by the HBC Planning Group during the following six months. Again, HIIAG and HI Councillors were excluded from this process. On completion, this Addendum was 'called in' for scrutiny by concerned Haying Island Councillors. The Scrutiny Board concluded there were outstanding issues to be resolved. However, the TA Addendum was signed off as 'complete' with the issues remaining outstanding.

At this Scrutiny Board meeting, the first and only independent review of the TA was presented by Professor Nick Hounsell. He was Professor of Highways and Traffic at Southampton University until 2017, and is an internationally-recognised expert in his field, experienced in consulting at Government level across Europe on major road infrastructure programmes. At this Board meeting, the Professor was given just 2½ minutes to present his findings. His detailed comments are provided separately. (See Appendix 3.) In fact, the views of HIIAG members and residents have been limited to 5-minute deputations at Council and Development Management Committee (DMC) meetings. It should be noted that another Road Design Engineer, Tony Higham, was a member of HIIAG from its inception in 2017, and whose contributions over two years were also disregarded.

The reason for excluding HIIAG from the TA process is unknown, and the behaviour of HBC in this matter has not been explained. This action is contrary to the HIIAG Terms of Reference (Appendix 1 refers) which clearly identify the road networks as falling under the Group's accountability for detailed scrutiny and critiquing.

Also please see a letter from the non-aligned HIIAG members presenting their letter of complaint on the approval process on the TA to the HBC Leader on 8 April 2020. (See Appendix 4.)

The most recent statement at a DMC review of the first Local Plan site to be examined on Hayling Island was made by the Planning Policy Manager on 29 October 2020:

> *"I would obviously highlight that the HITAA was obviously, and the HITAA generally, was some time in development. It is ultimately approved and published by the Borough Council. There was certainly a more unusual route to its approval ultimately for sure but it does represent an approved assessment by the Council. This was also commented on through the application by the Highways Authority which commented that on the basis that the Borough Council is satisfied with the findings of the HITAA that it considered the mitigation suitable."*

We strongly contend that the issues identified by the Inspector in 2013 remain unresolved.

- **The 1100 housing units proposal for Hayling Island in the Local Plan does not tell the whole story.**

This 1100 number must be considered the absolute minimum. HBC have stated that it should not be regarded as any kind of ceiling or limit. So, the increase across the Borough between now and 2037 will be higher, as will the growth from 2037 into the future. We also know that the Government are likely to increase the requirement further.

This means that the 1100 housing number and the single measurement point of 2037 are unrealistic and do not represent the most likely picture of the future.

The A3023/bridge complex, as stated, has no expansion options and its flow/ capacity is finite.

The TA in its current form does not present a realistic picture of the future, and further detailed analysis is required, including:

1. A realistic set of traffic growth parameters to cover a range of housing growth from lowest to highest case with a realistic time frame (not the arbitrary 2037 single point) for the lifecycle of the developments. Growth does not stop in 2037.

2. A detailed flow/capacity analysis, based on the above parameters, of the A3023/bridge single-access route to understand what the future holds. This is the only way to understand the impact of traffic growth (housing and leisure traffic) on the single fixed lifeline to the Island.

3. Removal of the numerous actions taken in the modelling process to deliberately minimise the impact of the housing plan, including:

    - The use of a 3-hour peak, not one hour or less
    - The use of neutral days does not reflect the actual peak traffic flows during the summer months. Hayling Island is a very popular holiday destination.

HBC's assessment of the A3023 in the TA is:

> *" Para 2.8 "Traffic flows on the A3023 can be particularly heavy, not only during peak hours, but in the hours in interpeak and at weekends. During school holiday periods, and particularly in the summer, traffic flows are at their highest and there is often a continuous procession of vehicles during daylight hours making joining or crossing the traffic stream difficult. Access for emergency vehicles can be inhibited by the constrained network at these times. The speed limit on the A3023 varies between 30mph and 40mph."*
>
> *Para 2.9 "Due to the lack of employment and facilities on the Island, there is a higher than average proportion of off-Island travel to destinations beyond the immediate area. This has the potential to limit the possible gains from modal shift (i.e. to walking and cycling) because typical journey length is longer than would be experienced elsewhere."*
>
> *Para 2.10 "Any disruption to traffic flow on the A3023 within Langstone, on the bridge, or on Hayling Island, impacts very quickly on other roads in the area due to the traffic sensitive nature of these routes. Should traffic congestion tail back onto the mainline of the A27 trunk road, this leads to the hazard of stationary or slow-moving*

traffic on a high-speed dual-carriageway, and into Havant town centre, therefore further reducing the resilience of the network, impacting journey reliability and reducing the attractiveness of the area for business investment and regeneration."

We agree with this assessment. These issues result in a 'do nothing' TA assessment of 'severe' impact, supported by the HBC statement:

"*The A3023 on Hayling Island is subject to increasing traffic levels due to car ownership and usage by residents, the necessity to access services off the island, together with cumulative development pressures which all add to daily traffic demand. Hayling Island has only one road route on and off the island with 24 hour daily average traffic flows at Langstone bridge of 26,508 vehicles. As opposed to a 'network' situation the 'one road only' situation for Hayling Island means that any incident and disruption on the A3023 is felt very quickly and can cause a problem that rapidly escalates with no immediate remedy available such as a diversion route. These incidents whilst often minor in themselves (e.g. a broken-down car or a parked delivery vehicle) have a disproportionately large impact on the efficient functioning of the A3023 corridor resulting in long delays, tailbacks into Havant town centre and beyond, and unreliable journey times. Hayling Island is therefore more vulnerable especially in the case of accidents and emergency roadworks which then have a big impact on the corridor and adjoining highway network. Clearly unmitigated additional development has the potential to worsen the situation significantly.*"

- **Moving on to the mitigation projects which HBC claim reduce the risk to below 'severe.' (Again, we must remember this is based on the minimal growth numbers.)**

We do not believe the mitigation measures proposed do anything to tackle the A3023 situation, even for current traffic, let alone for 2037 traffic, and even worse, 2037 traffic including new development.

The mitigation measures proposed include:

(i) 4 new junction designs/layouts;
(ii) New segregated lanes for right turning traffic;
(iii) New bus lay-bys.

Everything here is focused on the A3023, a clear admission that this is the crucial corridor. Whilst some of these measures may increase capacity on the A3023 locally, others reduce capacity, particularly some of the junction conversions to traffic signals. Crucially, none of the measures can or do address a key bottleneck on the Langstone Bridge/A3023 route.

A feature of micromodels used is that they do not easily provide what is a very useful output to aid interpretation – the ratio of flow to capacity (RFC), sometimes referred to as the V/C ratio. On a road link basis, this indicates how busy the road is; so, for example, a V/C of 0.9 would indicate that traffic is approaching capacity, with a 'spare' capacity of 10%. It is then relatively easy to see how much additional traffic a road could take, perhaps from a proposed development, before being overloaded. Note here that a practical maximum V/C ratio is often set at 0.85 to account for traffic variability, with the knowledge that delays increase exponentially when V/C ratios exceed 1.0.

These periods of extreme congestion can and often do back up traffic on the A27 and in Havant Town Centre.

The A3023 has a permanent counter at the bridge, and the actual traffic data is available 24/7 for at least the past 10 years. We know from this data that the peak flow loading at the bridge (during the TA assessment periods) is approx. 85% (a V/C of .85) with periods of higher summer activity over 100% (V/C 1.0.)

This makes clear that the free capacity is already limited (which probably resulted in the 'do nothing' severe rating) although that is not made clear because the detailed parameters used for the modelling have not been adequately explained.

As the mitigation measures degrade the A3023 performance, there is no proof that the 'severe' rating will be reduced.

As the V/C moves towards 1.0, the traffic status becomes increasingly unpredictable, and at 1.0 and above, exponentially so! At that stage, it probably doesn't matter what mitigation measures are in place.

Hayling Island's geographic location means that all of the emergency and infrastructure services must use the A3023 to service the Island community. These include:

Ambulance; Police; Fire Service; Social Services;
Emergency Maintenance eg Southern Water

This must not be forgotten as the traffic pressure increases.

HBC resistance to engage with HIIAG and undertake the obvious logical and essential flow/capacity study is unsupportable and requires a detailed explanation and justification.

It is the Hayling Island community which will have to live with the decisions made by HBC, and they are entitled to understand and be able to debate the decisions being made on their future.

- **The second area of concern is flood risk.**

Hayling Island has an elevation above Mean Sea Level of between approx. 0 and 25 feet (the highest point in the centre of the Island) and experiences south coast erosion and tidal flooding regularly from very high tides and major storms.

The only area which qualifies for Government protection funds is the south east peninsula (Eastoke) where a regular soft shingle replenishment is undertaken. The rest of the Island's coast – part 'hold the line' and part 'no intervention' – do not qualify for any protection funding. Close to 50% of the Island's landmass is classified (in the Environment Agency (EA) 2100 prediction) as Flood Risk Zone 3. This prediction is expected to be revised upwards shortly.

A Hayling Island Coastal Strategy Project by HBC partner Coastal Partners was funded in 2020. This initial project will report in 2022, and only then will we know

what the coastal recommendations and options are. At that time, applications for sea defence projects can be prepared for funding.

These requirements and timescales of the Strategy do not form an integral part of the Local Plan and TA, even though the A3023 is routed through three of the Zone 3 Flood Risk areas.

In addition, the low-lying Island suffers regularly from surface water flooding regularly every winter and after heavy rainfall. Surface water drainage is totally dependent on the ancient deep ditch network dug by farmers many, many years ago. This network drains into Langstone and Chichester Harbours through more than 100 one-way valves in the sea walls. These valves are the responsibility of either Southern Water or the EA. However, the ancient ditch network has no strategic oversight, and it is rapidly degrading with the change of land use for commercial development and housing, as the original maintenance, at the discretion of the landowner, is no longer the driving force it was. The proper function of this network is still essential, ~~and~~ as it forms an integral part of all the Sustainable Drainage Systems (SuDS) used on new developments to transport the output from the holding ponds to the sea. Climate change is already adding pressure to this system through increased rainfall. Near the coast, the already high water-table will particularly impact those areas which are already tide locked, with the anticipated EA tidal prediction set to increase 1.4mtrs.

This surface water network issue is not addressed in the Local Plan, which has been the subject of a complaint to HBC by a HIIAG member. (See Appendix 5.)

The first Local Plan housing allocation for Hayling Island, which is on a green field and a good grade arable field North of Sinah Lane, is now to be presented to the Inspectorate for Appeal.

This site presents some troubling, and as yet unresolved, issues.

- The land is low-lying and is affected by tide locking, as it is adjacent to Langstone Harbour. (See Appendix 6 for an explanation of Tide Locking and SuDS changes on the Sinah Lane site.) This situation means that the already high watertable rises twice a day with subterranean pressure from the sea. This situation will become worse with the EA's tidal prediction for the future. The groundwater level will also rise with more intense and frequent storms due to Climate Change. A full hydrogeological survey is required to study the risks and ensure that the SuDS are sustainable in perpetuity.
  We must also recognise that in addition to the EA predicted 1.4mtr tide rise, named storms may well reduce atmospheric pressure down to 950mb, which could easily increase the tide height by an additional .5mtr or more.

- The Sinah Lane site also requires two pumping systems: one for wastewater and one for surface water. These two systems must run 24/7, and cross-pollution is a real risk. A detailed fail/safe design and maintenance process must be established to prevent pollution of the site, the SuDS raised attenuation pond, and the drainage route through to Langstone Harbour – as a result of system failures, or incidences of very high rainfall (which is on the increase.)

- The plan for the site is linked to the provision of a protected bird refuge. It remains to be seen if a high-density housing development of some 480 souls, with its cats and dogs, rests comfortably with the quiet solitude required for wildlife in the adjacent fields.

- An indicative DMC meeting on the Sinah Lane development was held on 29 October 2020. (The application has already been appealed by the developer APP/18/00724.) It is now clear that this meeting was premature and the decision 5-2 in favour was based on incomplete information.

- Further evidence of the unease felt by Hayling Island residents over the lack of attention being paid to their concerns about development on Hayling Island by HBC can be found in a letter sent to Alan Mak MP by the Hayling Island Residents' Association Chair. (See Appendix 7.)

- It is now accepted by Hampshire County Council that there are major surface water issues as described above which require detailed investigation before any decision on solutions can be considered. It should be noted that this consultation required a direct interface between a HIIAG member and Hampshire County Council.

Clearly, the residents should have representation on the consultations involved.

We write to you now as the first Hayling Island Local Plan allocation housing application for 195 units is coming forward for Appeal.

The concern is that we don't know which of the many unresolved issues will be the straw that breaks the camel's back. Development decisions made now will all have long-term implications, and there is no way to undo them.

The residents feel they are being disenfranchised and have lost the ability to influence their future.

We hope you will accept this document as input for your deliberations covering your Department's assessment of development projects and the HBC Local Plan 2037.

Hayling Island Infrastructure Advisory Committee
Terms of Reference

Purpose of the group
The group is a committee to provide on the ground advice regarding infrastructure capacity on Hayling Island and its links to the mainland. The group will review information and evidence base being produced to inform the Havant Borough Local Plan 2036 and provide feedback on the results and conclusions of those studies.

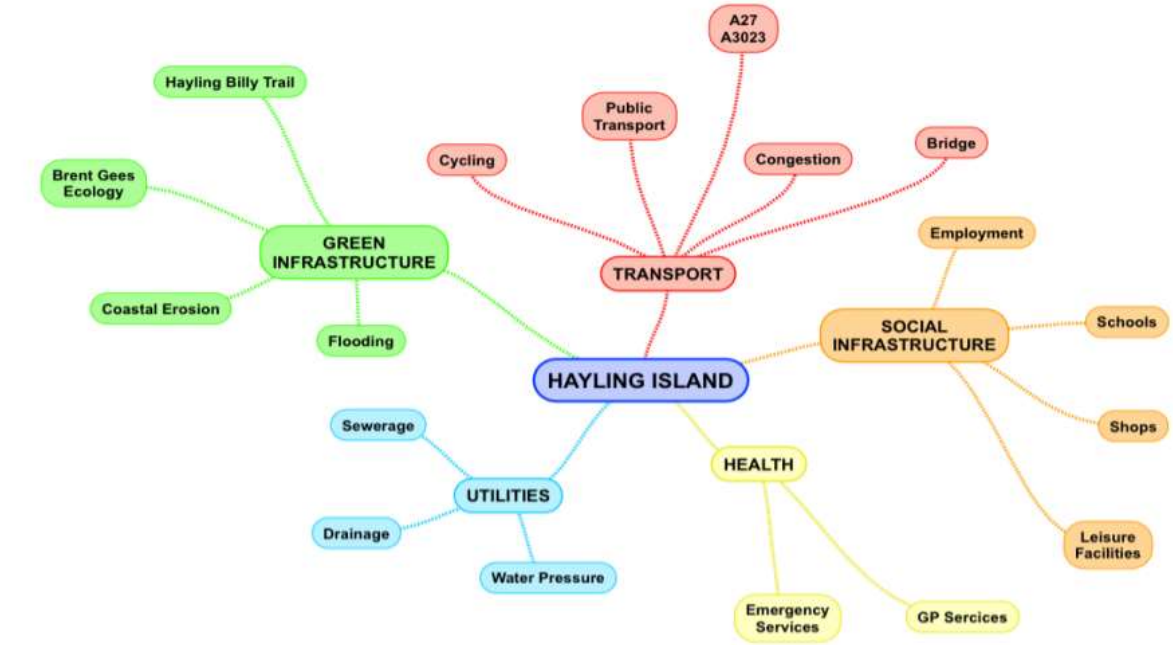
Context
The group is being formed in specific response to the Adopted Local Plan Housing Statement identifying that the infrastructure capacity issues raised through the 2016 consultation should be fully explored through the new Local Plan. The Housing Statement also highlights that the Council will continue to explore the sustainability of future development on the island through the Local Plan 2036 and its evidence base.
As such, the intention is to fully identify the infrastructure issues which new development could create and to explore what deliverable solutions to these there may be. This will be done by advising and critiquing the evidence base for the Local Plan.

Membership
The group is made up of officers from Havant Borough Council, Hampshire County Council (as Highways Authority) and community groups representing Hayling Island and Langstone.
Hayling Island ward councillors, county councillors and the Cabinet Lead for Strategic Innovation, Infrastructure and Projects will also be invited to meetings. Cllr Michael Wilson will chair the group.

Working methods and meetings
The group will meet approximately every two months and is hosted by Havant Borough Council at the Public Service Plaza. Havant Borough Council will circulate an agenda beforehand and organise the meetings.
Where relevant, other parties, such as infrastructure providers will be invited to attend meetings to input directly.

Sharing of information and resources, including confidential information
All group members are happy to have their contact details (name and email address) circulated.
It is the nature of the issues that work is not yet complete, preliminary data and emerging ideas will be shared and openly discussed. As it is not yet complete, such material is unsuitable for public release and wider discussion. Group members are free to highlight that meetings took place however the content of those meetings and what was discussed must remain confidential.

Hayling Island Infrastructure Advisory Group
Terms of Reference



EMAIL SENT TO MICHAEL WILSON, Hayling Island Infrastructure Group Chair, by Dave Parham, Save Our Island Group, via email 9.4.2018

Dear Michael,

As we are now closing in on the next Infrastructure Meeting on 25 April, there is clearly no time for the results of the A3023 reviews to be distributed and reviewed by the Committee ahead of time. We have a very real concern (given the very limited communication from both HCC and HBC on this topic) that the HBC approach will be to present the results simply to demonstrate that the road infrastructure can handle the allocation in the current Local Plan and attempt to draw the Advisory Group into some kind of consent. If this proves to be the case it will be rejected out of hand because:

a. HBC have taken 14 months to get their review to this point and the Advisory Group, as agreed, must be given a reasonable period to digest and evaluate the proposal. (We would recommend at least one month be allocated for the process.)
At the end of this period a meeting should be scheduled to consolidate the Advisory Group's recommendations for input into the Infrastructure Plan.

b. For the past 14 months the Advisory Group has required the leaders of the A3023 projects to establish the road capacity and growth potential over time to determine the quantity of and time schedule for housing growth on the Island. HBC allocations have been and will always be the minor percentage of new housing projects. Limiting the analysis to this small number will send the message to the land owners/ developers that unlimited windfall proposals are back on the table.
The only management tool available to control future housebuilding is a sustainable infrastructure model against which all projects can be measured to ensure a sustainable and economic community.

c. The establishment of the Advisory Group recognised the unique status of Hayling Island (single access – cul de sac – etc) and understood the need for a strategic infrastructure review to ensure a sustainable future. The housing allocations in the latest Local Plan are required to fit into this environment – not the other way round.

We are very disturbed by several aspects of the Road Infrastructure project, namely;

- The total lack of communication from the Roads Authorities,
- The silence from HBC on the results of the Hayling Island Traffic Survey last year, and
- The refusal of HBC to involve the Advisory Group in the traffic modelling process to date.

Should our worst fears prove to be accurate, we would be forced (despite our best efforts to avoid confrontation) to execute our promise to the residents with a minority agenda/status report, open and published to the widest audience.

If all the parties recognise the seriousness of the situation, we believe that there is time to resolve any potential issues with an improved and open communications environment between HBC and the Advisory Group. We look to you to lead the way to ensure the programme stays on track.

For our part, we are committed to appropriate and managed housing growth on the Island and are available 24/7 to assist in resolving any outstanding issues.

Michael, we apologise for the length of this note. You already know our strong feelings on this matter but if our nightmare scenario becomes reality, this document will become evidential.

Please advise us how you intend that the committee should deal with these issues. Our need for a response is urgent. I am available anytime.

Regards

Dave Parham, Save Our Island

SAVE OUR ISLAND'S REVIEW OF THE HAYLING ISLAND TRANSPORT ASSESSMENT ADDENDUM NOVEMBER 2019

AUTHORED BY: Dave Parham, Save Our Island Group

We are particularly grateful to Professor Nick Hounsell of SouthamptonUniversity for his technical advice on this submission

This review document has been prepared for the Inspector of the Havant Borough Council Local Plan 2036

1 INTRODUCTION

1.1 Hayling Island is a small community of some 8500 residential homes plus 2300 mobile homes (soon to be 2500) used as second (holiday) residences.--

1.2 We agree overall with HBC's assessment of the road infrastructure, specifically:

> *Para 2.6 "Hayling Island currently has approximately 17,500 residents and a number of small businesses, with a major influx of visitors who are attracted to the Island's beaches and holiday camps. The geography is unusual (**but in no way unique**) in that the A3023 is the only road linking the island with the mainland via a bridge, and all major statutory services are situated on or adjacent to this route. Beyond the Island, the A3023 passes through Langstone, immediately north of the bridge, before reaching the grade separated Langstone roundabout with the A27 trunk road and the B2149 for access to Havant town centre."*
>
> *Para 2.8 "Traffic flows on the A3023 can be particularly heavy, not only during peak hours, but in the hours in interpeak and at weekends. During school holiday periods, and particularly in the summer, traffic flows are at their highest and there is often a continuous procession of vehicles during daylight hours making joining or crossing the traffic stream difficult. Access for emergency vehicles can be inhibited by the constrained network at these times. The speed limit on the A3023 varies between 30mph and 40mph."*
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> *Para 2.10 "Any disruption to traffic flow on the A3023 within Langstone, on the bridge, or on Hayling Island, impacts very quickly on other roads in the area due to the traffic sensitive nature of these routes. Should traffic congestion tail back onto the mainline of the A27 trunk road, this leads to the hazard of stationary or slow-moving traffic on a high-speed dual-carriageway, and into Havant town centre, therefore further reducing the resilience of the network, impacting journey reliability and reducing the attractiveness of the area for business investment and regeneration."*

1.3 It must be noted that this accurate view of the current situation has no references in the Addendum proposal.

1.4 The A3023 has a limited capacity at Langstone Bridge and there are no economic options to increase this capacity. As a consequence, the free capacity becomes a precious resource which must be planned with great care.

The 2036 Local Plan calls for building 1100 new homes on the Island out to 2036.

This will make the already stressed road infrastructure worse, and the "do minimum" option is considered a "severe impact." The mitigation projects are felt by HBC to reduce the impact below the "severe" threshold, but it must be noted that most of the mitigation changes add to journey times as they effectively reduce the A3023 trunk flow capacity further.

1.5 We believe that because of the capacity constraints, more work is required to understand the consequences of increased loading as the A3023 network comes under stress, and to understand the additional changes required before any determination can be made as to the severity of the impact.

1.6 There is also a Flood Risk Strategy Plan by the Eastern Solent Coastal Partnership for Hayling Island in its very early fund-raising stage. This is the first such plan and recognises the vulnerability of this low-lying Island with no strategy in place. Any development should recognise this situation including the risk to the road network. We are told that the Strategic Plan document (if funded) will be available towards the end of 2020 as confirmed to Alan Mak MP.

1.7 The comment in our introduction 1.2 (referring to HBC para 2.6): the phrase ***"but in no way unique"*** should be revised.
Following research on all of the islands connected by bridges around the coast of England, Wales and Scotland, only one could be considered similar to Hayling Island. Walney Island is a barrier island off the nose of Barrow-in-Furness. It has a population of 12,000 and 650 mobile homes (both numbers significantly lower than Hayling.)

2 DETAILED COMMENTS AND FINDINGS

2.1 <u>Statement from Councillor Pike in his Foreword Presentation</u>

The statement by Councillor Pike that "*mitigation is possible which removes the severe impact – therefore development cannot be prevented by highway issues".*
We cannot see evidence of this in the Consultants' report.

2.2 <u>A3023 Speed (para 4.45)</u>

In the context of reducing speed limits on the A3023 to 30mph, the assertion that a 30mph limit could enable traffic volume to increase as high as 400 vehicles per hour compared to a 40mph limit is not justified. Speed-flow curves, such as in Fig 13 (page 32) were developed to show the impact that

increasing traffic flow has on average speeds, not the effect that speeds have on flow. It is known that reducing speeds on motorways from 70mph to, say, 50mph can result in increased capacity due to the smoother flow that results, but we are unaware of any evidence that this applies at lower speeds on non-motorway roads.

2.3 Traffic Density (para 4.80)

We concur with the report statements which summarise the problems very well:

> "*The A3023 on Hayling Island is subject to increasing traffic levels due to car ownership and usage by residents, the necessity to access services off the island, together with cumulative development pressures which all add to daily traffic demand. Hayling Island has only one road route on and off the island with 24 hour daily average traffic flows at Langstone bridge of 26,508 vehicles. As opposed to a 'network' situation the 'one road only' situation for Hayling Island means that any incident and disruption on the A3023 is felt very quickly and can cause a problem that rapidly escalates with no immediate remedy available such as a diversion route. These incidents whilst often minor in themselves (e.g. a broken-down car or a parked delivery vehicle) have a disproportionately large impact on the efficient functioning of the A3023 corridor resulting in long delays, tailbacks into Havant town centre and beyond, and unreliable journey times. Hayling Island is therefore more vulnerable especially in the case of accidents and emergency roadworks which then have a big impact on the corridor and adjoining highway network. Clearly unmitigated additional development has the potential to worsen the situation significantly."*

2.4 Addendum Measures (para 4.81)

> *"Assuming that the mitigation measures described in the HITA and in this Addendum are implemented, the impact of the proposed Local Plan development on the current level of resilience on the A3023 corridor will be balanced by additional capacity, additional opportunities for access (especially for emergency vehicles along the Hayling Billy Trail) and an overall improvement in highway safety by removing or improving those locations which give rise to the greatest numbers of road traffic incidents."*

We do not believe the mitigation measures proposed do anything to tackle the A3023 situation, even for current traffic, let alone for 2036 traffic, and even worse, 2036 traffic including new development.

2.5 Mitigation

The mitigation measures proposed include:

(i) 4 new junction designs/layouts at Church Road/A3023, West Lane/A3023, Northney Road/A3023 and Langstone Technology Park/A3023;
(ii) New segregated lanes for right turning traffic at some locations on the A3023;
(iii) New bus lay-bys.

Everything here is focused on the A3023, a clear admission that this is the crucial corridor. Whilst some of these measures should increase capacity on the A3023 locally, others could reduce capacity, particularly some of the junction conversions to traffic signals. Crucially, none of the measures can or do address a key bottleneck on the route – Langstone Bridge.

Another feature of micromodels is that they do not easily provide what is a very useful output to aid interpretation – the ratio of flow to capacity (RFC), sometimes referred to as the V/C ratio. On a road link basis, this indicates how busy the road is; so, for example, a V/C of 0.9 would indicate that traffic is approaching capacity, with a 'spare' capacity of 10%. It is then relatively easy to see how much additional traffic a road could take, perhaps from a proposed development, before being overloaded. Note here that a practical maximum V/C ratio is often set at 0.85 to account for traffic variability, with the knowledge that delays increase exponentially when V/C ratios exceed 1.0.

Two factors are also relevant here to suggest that the model does not tell the full story:

(i) Peak-period modelling aggregates traffic over a 3-hour period. This is a much wider period for a peak than exists in reality for Hayling traffic, which in reality would be more like 1 hour. This aggregation does not allow for the mid-peak congestion;
(ii) The A3023 is a busy single-carriageway two-way road, and any reduction in capacity (e.g. due to parked vehicles, roadworks, loading/unloading, accidents, etc) can cause a rapid and significant build-up of queues. Similarly, being a holiday island, increases in traffic demand in the summer and when special events occur can also cause significant traffic congestion. None of this is reflected in the modelling, which only looks at 'neutral' traffic conditions.

It might be expected that a number of intermediate years between now and 2036 would be modelled, perhaps coinciding with years when the more major proposed developments are completed. This is anyways likely to be required in areas adjacent to such developments when more detailed planning is undertaken. However, the approach taken in this study – modelling only in 2036 – should at least provide a 'highest case' scenario for traffic, as it demonstrates the impacts of a combination of the highest 'natural' traffic growth and the highest development-related traffic. As forecast traffic growth

between now and 2036 is continually upward, there should be no combination of traffic growth and development-related traffic which gives a worse case than that of 2036. However, congested situations on the A3023 will be much more frequent than in other networks where 'neutral' situations are modelled, due to the very different road and traffic situations pertaining to Hayling Island.

The modelling indicates that journey time increases will be small or (at most) modest in the 2036 'Do-Minimum' situation, implying that the network operating in the Base Case had significant spare capacity. This largely reflects the use of 'neutral', non-holiday periods in the modelling, the use of 3-hour peak periods and other scenarios not represented in model Appendix B/5.

Other key factors here are that forecast 'natural' traffic growth to 2036 assumed in the modelling is relatively low and (crucially) the fixed capacity implied for Langstone Bridge is not transparent.

2.6 Safety

It is important to note that the mitigation modelling results say nothing about safety. An evidence-based safety evaluation should be undertaken and reported before any statements are made on safety.

2.7 Tables A1 to A8

The use of a 30-second difference to highlight larger differences in journey times between the 'Do Minimum' and the 'Do Something' situations irrespective of overall journey time/distance is strange and could be misleading. Why not use a percentage difference? More importantly, with the exception of Table A4 (page 80), there are as many, if not more, sections with **longer journey times with the mitigation measures than without.** So the modelling evidence seems to contradict the report conclusions that the mitigation measures will allow the new developments to be accommodated. In addition, it is important to clarify the content. If the audience is intended to be the stakeholders of the community, the tables should be headed 'NEUTRAL DAY ANALYSIS' and a comparison of mitigation to the base should be included as the current tables are focused on what in reality is only comparing two iterations of the same model forecast.

2.8 Societal Benefits

This section appears to be highly subjective and very biased towards benefits. Of over 200 entries in the Societal Benefit Matrix, all measures either have neutral or positive/highly-positive benefit. **None are negative.** This analysis should have results in a **Societal Impacts Matrix**, as some impacts will be negative. For example:

(i) On public transport, when buses are blocked in bus stop lay-bys;
(ii) On local pollution, noise, etc at new traffic signals where deceleration, stopping and acceleration will be required; and

(iii) New developments on the Island which will attract additional traffic cause more congestion and add delays to emergency services and increase greenhouse gas emissions.

2.9 Langstone Bridge

Langstone Bridge probably has a capacity slightly greater than the various 'bottleneck' locations either side of it, so it is not usually the critical point on the A3023 corridor at the moment. By improving these bottlenecks either side, as proposed in the mitigation measures, the bridge will soon become a bottleneck … but nothing can be easily/affordably done to increase its capacity noticeably. At this point attention will have to turn to demand management and/or traffic management (compare with the Bitterne Scheme in Southampton.) If this is going to happen before 2036 (highly likely), then this scenario should be included in the analysis, together with the V/C analysis recommendations below.

3 RECOMMENDATIONS

We recommend that:

3.1 Additional analyses are provided to evaluate the mitigation modules. It should be possible to see the performance of the modules under variable load conditions including stress scenarios, but currently the performance of the mitigation modules under variable circumstances is unknown. This would normally be undertaken with additional iterations of the microsim model or a V/C ratio analysis.
Without these reports it is not possible to calculate their impact today or the options going forward in the real environment.
We would also recommend the peak measurement should be against the more representative one-hour time slot, not the three-hour smoothing used in this report.

3.2 As the bridge will soon become the A3023 bottleneck, a focus study is undertaken showing:

(1) Its capacity (C)
(2) Peak flows at present (V), giving current V/C ratios
(3) Peak traffic demand in 2036 with no development (V_{2036}) – to clearly show the traffic growth forecast used – to give V_{2036}/C ratios
(4) Peak traffic demand in 2036 with new development (V_{2036ND}), giving V_{2036ND}/C ratios

This would clearly show the extent to which Langstone Bridge can cope with future traffic growth and inform what further analysis is needed.

3.3 The *"**no way unique**"* statement is corrected (1.2)

3.4 Councillor Pike's Foreword Statement is corrected or validated (2.1)

3.5 The A3023 40-30mph statement is corrected or validated (2.2)

3.6 An evidence-based evaluation is undertaken covering safety (2.6)

3.7 Travel Time Tables should be revised as recommended (2.7)

3.8 The Societal Benefits section is expanded to become a fair and accurate Societal Impacts section (2.8)

3.9 The Reality

The introduction from HBC is a fair representation of the A3023 road complex and confirms that the main trunk is heavily loaded, vulnerable to any blockages, and is constrained by its flow capacity. The neutral period evaluation indicates a 97% fit; however, that is not the case with Hayling. The vulnerability of the environment together with capacity constraints are the reasons why we strongly recommend stress tests and V/C ratio analyses before any decision is taken, because a significant housebuilding programme would add to that pressure.

Havant Borough Council should also be prepared to re-evaluate the quantity and type of housing which would be appropriate in the best interest of the community. Windfall is and has always been a significant category of development on the Island (up to 100 p.a.) This may represent a process closer to the natural evolution of the Island rather than the large developments proposed.

In any event, this process should be informed by the new road capacity studies recommended in this report.

3.10 Dave Parham and Professor Nick Hounsell would welcome the opportunity to present themselves to the Inspector for opinion or clarification.

4 CONCLUSIONS

4.1 The "neutral days only" analysis, which is the basis of this report, is not representative of the A3023 road network supporting Hayling Island. The population growth in the summer (20-25%) together with the HBC initiative to increase leisure activities are not included in the modelling. This may lead to incorrect decisions being taken on both the road infrastructure and the development opportunities. We recommend that all development applications are kept "on hold" until the recommendations in this report are satisfactorily resolved.

4.2 The mitigation projects identified in the Addendum may well have beneficial effects on the side roads, but the major trunk capacity – the key element – is degraded as the flow capacity is reduced. We believe that the recommended additional analyses should be undertaken to avoid unwarranted development and associated costs.

4.3 It is important for us all to work for a sustainable conclusion.

What are the next steps planned by HBC and how may we assist the process?

We (Save Our Island Group) are of course under pressure to publish our findings, but would wish to represent the most positive outlook.

AUTHOR:

Dave Parham – Save Our Island Group
Retired VP of Unisys Corporation, responsible for worldwide IT infrastructure, communications networking and key project management and process audits

TECHNICAL ADVISOR:

Professor Nick Hounsell MSc PhD CEng MICE FCIHT
Many years consulting corporations and Governments, covering Europe, Asia and South America on transport and infrastructure

BIOGRAPHIES:

Professor Nick Hounsell *is a Visiting Professor within Engineering and Physical Sciences at the University of Southampton. He was Professor of Highways and Traffic within the Transportation Research Group until October 2017. He has over 30 years' experience of research into traffic engineering, urban traffic management and control, road network modelling and public transport operations using Intelligent Transport Systems (ITS) applications. He has managed a Rolling Programme of research for Transport for London into UTC and bus priority operations for some 15 years, and led a number of projects in this area funded by the European Commission. He was the Coordinator of the MSc Programme in Transportation Planning and Engineering, which has also been offered in Beijing, China and is involved in a number of educational networks in Europe funded under EC programmes including TEMPUS and Leonardo da Vinci. He is a Chartered Civil Engineer and past Chairman of the Transport Group of ICE South.*

Nick is a member of Langstone Sailing Club and has a residence on Hayling Island.

Dave Parham *is a retired Vice President of the Unisys Corporation. Through his 40 years with the Corporation he managed many large-scale developments including: the first Europe-US satellite computing; the first international email system 3 years before the development of the Personal Computer; the first worldwide Data Centre consolidation – over 60 Data Centres into one. This was a precursor to what is now known as cloud computing. He also ran a joint technology venture with Microsoft and ended with the responsibility for worldwide IT infrastructure & telecoms and strategic corporate project management. He also claims to be one of the few people who have programmed every generation of computer (very badly!). Attended and presented to the US Conference Board.*

Dave is a member of Mengeham Rythe Sailing Club and Hayling Golf Club. He was born on Hayling Island, and lives there now.

Letter of complaint from the Non-Aligned members of the Hayling Island Infrastructure Advisory Group to Council Leader Michael Wilson dated 3.4.20 re the Hayling Island Transport Assessment Addendum

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TO: Councillor Michael Wilson
Leader of Havant Borough Council

Cc: Alan Mak MP

Havant Borough Council
Gill Kneller
Tim Pike
David Hayward
Jennifer Parkin
Stuart Wood
Louise Berridge
Linda Jewell
Jacqueline Boulter
Steve Mountain

Hampshire County Council
John Coughlan CBE
Caroline Richardson
Graham Wright
Lance Quantrill
Holly Drury
Chris Hirst

Havant Borough Council
Hayling Island Councillors
Rosy Raines
Leah Turner
Issy Scott
Clare Satchwell
Joanne Thomas

Havant Borough Council
Operations & Place Shaping Board Councillors
Dianne Lloyd
Malc Carpenter
David Guest
David Jenner
Sarah Milne
Rosy Raines
Gwen Robinson
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Richard Coates
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Angie Bryson
Andy Lewis

Andrew Pearce ESCP
Hayling Golf Club
Ray Gadd Golf
General Manager Sinah Warren
Ivan Snell
Stephen Schrier

Media
The News
Hayling Herald
Wave Radio
Radio Solent
BBC South Today
ITV Meridian News

TO: Councillor Michael Wilson
Leader of Havant Borough Council
Cc: See separate distribution list

FROM: The Non-Aligned members of the
Hayling Island Infrastructure Advisory Group

DATE: 8 April 2020

SUBJECT: HAYLING ISLAND TRANSPORT ASSESSMENT ADDENDUM

Dear Michael

We, as non-aligned members of the Hayling Island Infrastructure Advisory Group (HIIAG), wish to complain in the strongest possible terms about the actions of Cllr Pike on the matters revolving around the Hayling Island Transport Assessment Addendum (HITAA) Call-In and approval process.

On 6 February 2020, the HIIAG were informed by Cllr Pike that discussions on the HITAA were complete and would not be addressed in any future meetings.

In early-March, six councillors exercised a Call-In on the HITAA. This very rare and brave action reflected their concerns on the strategy and conclusions drawn.

As a result, a review of the HITAA took place on 10 March 2020 by the Operations & Place Shaping Scrutiny Board, where the Call-In was considered justified, and it was concluded that more work was required on funding, flood risk, mitigation, the Billy Trail and the A3023/Bridge.

A scant five days later, Cllr Pike responded with a Technical Note and a separate note to the Scrutiny Board Chair, Cllr Lloyd, sweeping aside the input from local experts, the Call-In councillors, and the decision from the Scrutiny Board, deeming them as “not necessary” and a “disproportionate hinderance.” Stating here that he, Cllr Pike, is the arbiter of proportionality in this matter is an action of stunning self-appointed authority.

The Technical Note, which is highly selective in its content, does not faithfully reflect the issues raised. It stated to Cllr Lloyd that there was no reason to change the HITAA, and therefore it had been signed and forwarded to the Cabinet for the meeting on 25 March to support potential approval of the Local Plan.

These two notes were not considered acceptable by the Scrutiny Board or the residents’ representatives.

But as the decision made by Cllr Pike is the final one, the matter cannot be called-in again, and the Scrutiny Board's reply to the Technical Note does not therefore form part of the formal decision-making process, which is required to be recorded and published. As a

consequence, the continuing dissatisfaction of the Scrutiny Board and the Call-In councillors will never be made public.

There was no reason for this pre-emptive action by Cllr Pike other than to drive the HITAA through while we were all preoccupied with concern for our friends and families during Covid-19. In addition, an urgent DMC meeting on 26 March was scheduled to determine the first development on Hayling Island at land North of Sinah Lane.

Thankfully, both the Cabinet meeting and DMC meeting were cancelled.

We conclude the actions taken were with full knowledge of the consequences, and as such may represent political chicanery of the highest order, and should be investigated. Clearly HBC's commitment to openness and transparency is slipping away.

It is now essential to make clear our position as representatives of the local Island community on HIIAG.

The Local Plan allocations for Hayling Island include approx. 1,300 new homes. The stated objective of HBC is to leave no stone unturned and develop any site available. The HIIAG has been told that medium-sized windfall opportunities (historically the largest sector by far) are not included in the Local Plan, and moreover, that we are not to view the 1,300 as any kind of ceiling or limit – all additional sites will be considered moving forward, so it is not sound to reference a limited growth and timeframe to artificially minimise the impact. As the HBC's stated objective demonstrates that the Local Plan is a continuum, not a limited project, the HBC are obligated to provide a parallel sustainable infrastructure for the (NPPF-recommended) lifecycle of the development. The impact of the Local Plan does not end in 2036 – it is when the impact of the Local Plan begins !

The only way to understand the road infrastructure impact of the Local Plan is to evaluate the A3023 trunk, which is a limited and finite resource with no economic corrective actions available to expand its capability. This road is the lifeblood of the Island and must be managed to ensure a sustainable future for the community. Claiming that this over-riding constraint of the capacity of the A3023 is not the concern of the Local Plan sets a dangerous and potentially disastrous precedent as explained above.

The only way to evaluate the Local Plan's impact over time is to undertake a detailed flow/ capacity analysis of the A3023.

This should be based on a range of traffic loading from Worst to Best Case through time. This is essential because as the loading increases beyond the capacity – as we believe it will – this bottleneck will seriously impact Business, Tourism, Leisure Activities and Emergency Services. Investigation should be focused on the A3023 Bridge choke point to alleviate congestion.

The best and most economic way would be to limit extra traffic to and from the Island by controlling development.

The parameters which drive the traffic models, including growth, have not been published outside the project team – although requested by HIIAG many times – and have not received external review. This is a key requirement as it is the quality of the input parameters which define the quality of the output – not the process undertaken.

HBC stated that the members of the HIIAG would have sight of all model parameters, an audit trail of changes, and education to understand the modelling process. None of these commitments made by HBC have been honoured.

We view the review of the consultants, CampbellReith, to be of limited value as it only studied the work done, not what should have been done, e.g. Hayling Island strategic requirements. This is like asking your best friend to mark your exam papers.

The Save Our Island Group's detailed report on HITAA presented to the HIIAG did not receive a response from HBC, and their offer to assist in this process with their internationally-recognised road design expert has not been taken up.

We also note that Cllr Pike has now changed his infrastructure focus to intimate that the prime objective is to improve the Island's road junctions, and the developments will be needed to fund them. This is a misrepresentation of the facts. The HBC plan is to build 1,300 new homes plus an infinite number of windfall applications. The HITAA is to support this programme … not the other way round.

Flood risk to the Island is a real and present danger, and only now is the Eastern Solent Coastal Partnership starting on a Hayling Island Coastal strategy. This will run through 2021, and on completion we will for the first time understand the risks, the options and the funding restrictions. We know that 80% of our coast will not meet the 8:1 funding ratio so it is unlikely that Government monies will be forthcoming. Again, the Government require this Coastal Strategy to maintain a sustainable infrastructure for the lifecycle of the plan – 60-100 years.

The flood risk issue is not addressed in the Local Plan or the HITAA, and recent experience at West Beach demonstrated that erosion is impacting much faster than anticipated. Logic would dictate that all development in this environment be informed by the result of the Coastal Strategy.

Cllr Pike, in a note to a HIIAG member, has told us that he is taking full account of local circumstances – we adamantly disagree. In the same note, he remains disappointed that members of HIIAG have spent time trying to undermine the work of HBC's professional Officers and Consultants rather than trying to improve our proposals. Cllr Pike and his team do not hold a monopoly on experience, knowledge or professionalism. In our democracy this process should never be seen as threat to authority, but proof that the public are actively engaging in the consultation, as is required by the NPPF.

The members of HIIAG have taken this as a personal insult, which we are sure was the intention. For three years, HIIAG have worked only to improve the Local Plan in the face of a stream of barriers presented to it, requiring tenacious endeavours to get relevant opinions recognised.

We conclude that the HITAA in its current form remains unsound and does not provide for the long-term sustainability of the Island's community.

If the Hayling Island elements of the Local Plan move forward unchanged, Cllr Pike will have placed HBC in an unnecessary head-on confrontation with the Island residents which will run and run.

We do not claim to understand the processes and constraints which govern the HBC organisation, but in the wide world of industry and commerce, any decision considered inappropriate can and will be reversed in short order. We would ask you as Council Leader to use whatever mechanisms are open to you to stop this runaway train from creating a potential disaster.

We ask you to ensure this considered document is made available to the Inspector as this is the only avenue for communication left open to us, and we must now trust our future to the integrity of the independent review process.

Kind regards,

David Parham
Richard Coates
Robin Davison
Wilf Forrow
Ann Griffiths
Rosie Law
Mike Owens
Jim Palmer
David Pattenden
John Perry
Ray Rowsell
Peter Sebley
Anne Skennerton
Robert Woodward

13 November 2020

Letter of complaint to HBC re Advisory DMC 29/10/2020 APP/18/00724

Dear Sir or Madam

This letter is a formal complaint regarding factual inaccuracies within the presentation made to the Advisory Development Management Committee (DMC) on 29th October 2020 for Land North of Sinah Lane, Hayling Island APP/18/00724.

The inaccuracies stated misinformed the DMC and would have led to misunderstanding and confusion about serious constraints of the site. There was also a failure to ensure important information was understood before the final advisory decision was made.

The following points need to be raised:

1. Tide Locking

An important constraint of developing this site is the fact that it is 'tide locked'.

The councillors had asked for an explanation of tide locking in the Site Briefing held earlier in October. However, in addressing this topic, in place of explaining a natural, complex physical process relating to interaction between three bodies of water - the adjacent harbour, underground freshwater (groundwater) and surface water within the site, the Planning Officer instead, described a tidal lock - a man made mechanism which prevents harbour water entering the system when high tides rise above the level of the outlet valve.

This was not relevant, but the Planning Officer gave further weight to the point by referring to a discussion with the Environment Agency, who own and manage the specific outlet valve, which regularly needs unblocking from the pebbles and shingle that obstruct the valve from working properly.

This left the councillors uninformed about a serious planning constraint that will affect not only this site but the surrounding area.

Councillors must be able to understand that tide locking is very different from a tidal lock and not be misinformed.

The reason why this error is so important is because tide locking is a real threat to the new development and the surrounding existing residences. The effect of the tidal forces upon the groundwater bulge, already so close to the surface of this site, as well as downward pressure created by weight of the building materials placed on the site of the new development, will push the groundwater upwards and could easily add to the surface water flooding.

Most significantly, this calls into question the viability of the proposed SuDS.

Any disturbance of groundwater beneath a clay layer is a known cause of subsidence. The movement of the alluvial deposits (underground where the groundwater flows), have already led to the damage of the ageing and deteriorating foul and waste water drainage pipes, causing a breakdown of sewerage drainage on Hayling Island.

The impact of Climate Change will amplify the effects. The rising sea levels, increase in the frequency and intensity of storms and other weather events will add to the volume and level of the groundwater as well as the surface water. The higher sea level will increase the tidal pressure on the groundwater, forcing it to follow paths of least resistance, spread further and rise upwards, adding to the surface water flooding.

Therefore, this failure to explain and inform decision makers about tide locking undermines the planning process and raises highly significant concern. Decision makers must be given this information as it does bring into question the sustainability and suitability of this application. Further scrutiny is imperative and independent expertise should be sought.

2. Langstone Harbour Board's objection

It was stated that all consultees agreed with the application except for the Tree Warden. This is not true. Langstone Harbour Board objected too. (Page 53 Officer's Report)

This was not mentioned at all.

Langstone Harbour Board's objection is highly significant considering the international conservation status of the Harbour including SSSI, SPA and 3 nature reserves in the harbour.

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Excess pumped surface water from the site will still be directed to drain into the Harbour. Single point of failure of any part of the SuDS will mean that unfiltered and possibly contaminated water will also flow directly into the highly sensitive waters of the Harbour. In addition the nitrate rich runoff from both the onsite and E26 refuges will drain directly in Langstone Harbour due to the increased use of fertiliser and pesticide needed to establish and maintain, in perpetuity, the mono-crop for foraging. Natural England has also acknowledged this point.

3. Erosion

It was stated that the 'Coastal Team' were not worried about erosion yet the Planning Officer did not report that the East Solent Coastal Partnership (ESCP page 22 Officers report) states 'significant rates of coastal change' along the coast of Langstone Harbour at the edge of the onsite refuge and of E26.

It is important to illustrate how these 'significant rates of coastal change' led to a proposal to move parts of The Hayling Billy Trail inland from this area (the E26 refuge) to protect it from the coastal erosion and the effects of being in flood zone 3. Yet this statement has since been removed from the Pre-submitted Local Plan in the changes in the Emerging Local Plan.

This erosion is a known issue of the HB planners who work on the Local Plan, so to understate this issue and cherry-pick only comments in favour of the application is misrepresenting the consultees' views, misinforming the Councillors. This part of the coast is clearly vulnerable to the effects of climate change and not sustainable in perpetuity.

4. The Community Infrastructure Levy (CIL)

The Planning Officer stated that CIL money from this development - nearly £700,000 was stated for the A3023 mitigation and a main reason for this application to be agreed, despite all the constraints for the site. However this was contradicted later in the meeting when it was pointed out by another planning officer and a Councillor that there is no guarantee the money raised from this development would be spent on Hayling Island, let alone this site's own mitigation requirements. Councillors were clearly confused by this.

5. The Appeal Status of this Application

Undecided Councillors were misinformed in making their decision.

This application is already going to Appeal, but this fact was not re-emphasised when Councillor David Guest, incorrectly argued that a major reason in support of

the motion to permit the application, was the possible threat of appeal. He stated that there would be no ability to raise money, should it be refused and go to appeal. The fact that this application is already going to appeal was lost and even the Chairman had to be reminded at the very end of the meeting, after the vote, that this was an Advisory meeting regarding the Councillors' decision for the Inspectorate.

Planning officers have stated that, when weighing up the planning balance, gaining the CIL money is a strong reason to agree with this application. Again the Committee were misinformed as the money may not be forthcoming due to the Appeal process and the balance has been tipped making the constraints of the site much more important.

It should be stressed that Councillor Guest was deputising for the Ward Councillor Satchwell who stood down from chairing the meeting in order to give a very informative deputation, using her knowledge of the site and of Hayling Island's issues. Councillor Guest made few, if any, comments on the actual site constraints at all and the pressure put on others in the committee to comply with what was a flawed argument, was unconscionable.

6. **The Minutes of the DMC** (as of 11th November 2020)

The minutes of the DMC are inaccurate. Important written deputations made before the DMC, and not presented verbally, should be listed.

In addition the group names of some of the verbal deputies are incorrect. These include Rosie Law (SWHayling group and Independent Resident) and David Parham (Save The Island). Neither deputee is representing the Hayling Residents' Association.

All written deputations should be added to the minutes as well as relying on the recording.

Councillors take their lead from the information provided at meetings by the planning officers. It is of significant concern that there were a number of inaccuracies and omissions of key facts that were clearly relevant to this application. The constitutional duty of the planning officers to appropriately inform Councillors was demonstrably not fulfilled.

For the sake of the residents, present and future, the environment and the Borough Council, this complaint needs to be looked into as soon as possible and all findings explained, publicised and certainly shared with the Inspectorate.

Yours faithfully,

Rosie Law (independent resident and SWHayling
Anne Skennerton (Hayling Residents' Association, Chairman)
David Parham (Save Our Island)
Mike Owens (concerned resident and Hayling Sewerage Watch)
Robin Davison (Save Our Island)

Land North of Sinah Lane: Tide locking and Recent SuDS Changes

In the Pre–sub Local Plan 2036 it is stated that just one of the many constraints of the site (H29) included the '*complex drainage system in the area - affected by tide locking, coastal change and tight levels; likely to require drainage solutions and maintenance of systems beyond site boundary'.*

Tide Locking

This is a complex process with regards to groundwater (underground fresh water) in coastal areas. The effects of not only the Moon but also the pressure changes around the coast due the tidal movements of the ocean, all play a part. However, for the purposes of critiquing the SuDS proposed for this site, it should be noted that there has been recognition that the water within the site rises when the tide comes in and falls when the tide goes out. This is why the site is designated as 'affected by tide locking' - the water of the harbour and the water of the site are linked.

Recent SuDS Changes

The newly amended drainage plan was discovered in the detail of the recent Flood Risk Assessment (FRA). This document was only produced in March 2020 just before the original date for the DMC for this site, giving no time for the scrutiny it needs. As this DMC was postponed, due to Covid-19, we have had time to look at the details. In earlier correspondence regarding the site, I had identified to the planners that no record of a Specific FRA or Exception Test for the site had been produced, yet these were clearly required due to the size of the site and the coastal boundary of the proposed onsite refuge area is in flood zone 3.

In the original proposal, to deal with the overflow from the attenuation pond, Southern Water's infrastructure was to be involved but **this has been changed after rejection from Southern Water,** as described in the recent FRA. It will now be draining out into Langstone Harbour!!

The drainage plan is now as follows:

1st to pump and hold water within a raised attenuation pond

2nd to allow the overflow from this to go northwards offsite via the existing drainage ditches (currently overgrown and needing continuous maintenance to be effective)

3rd to drain into an offsite previously untouched ancient natural pond (at the Northern boundary of the site containing rich ecology)

4th to flow through another offsite ditch adjacent and seeping into the saltmarsh

5th to eventually drain into the Langstone Harbour (deceptively avoiding this name in the FRA by stating 'Sinah Lake', a lesser known *channel* within Langstone Harbour) via the drainage outlets that frequently become blocked by the pebbles on the eroded west coast next to the rare habitat of the saltmarsh.

Bodies of Water Affecting the Site

It is imperative to understand that this site itself is affected by 3 separate (but closely interlinked) bodies of water, one of which is hidden underground and all of which cause flooding now and in the near future:

1. Langstone Harbour – borders the site and is internationally protected RAMSAR, SPA, SSSI etc

2. Surface water – especially after heavy rainfall in the winter months which currently
   - does not drain away quickly in any particular direction
   - percolates downwards very slowly due to high water table
   - slowly evaporates therefore reducing the pressure on other drainage infrastructure for the area
   - will include polluted hard surface run off post development

3. Fresh 'groundwater' that runs **under** the field which we discovered when servicing a soakaway in our back garden (adjacent to the field). The council has also recognised this fact due to data recorded from measurements taken from this field in the last few years.

This fresh groundwater
   - lies only about 1m to 0.45m below ground level in sandy, shallow superficial deposits which are porous than the surrounding London Clay
   - links to the surface water especially at times of heavy rainfall due to percolation
   - **rises and falls with the tide due to tidal forces**
   - is continually replenished and this will increase with Climate Change
   - is most likely derived from surface water, precipitation and with some contribution from sandy layers/lenses within the London Clay Formation. Groundwater is likely to be perched on a low permeability horizon, i.e. the London Clay Formation
   - may receive a small contribution from the Chalk Aquifer. The Chalk receives recharge from rainfall at surface, overlying superficial deposits and the Chalk bedrock aquifer of the South Downs

Clay Layer Compromise

The site has a less permeable clay layer just below the surface of the field that currently separates surface water from the fresh groundwater below the surface. This will be compromised by the development.
The clay will be punctured by man-made structures such as housing foundations, which necessarily go deeper than 1m, creating a link connecting the groundwater to the surface. Therefore what would have been two fairly distinct bodies of water - (a) surface water and
(b) confined underground fresh groundwater - will instead become directly connected. Once these connections are made, the squeezing effect from the tide locking and the sucking effect from the pumping of the surface water will mean that both bodies of water will be as one.

Whilst the compromising and puncturing of the clay layer between groundwater and surface water has already happened across Hayling due to the houses that are already built, there is a huge difference between the drainage techniques already in use such as soakaways etc. and this site's proposed SuDS. Soakaways allow water from the surface to drain down (percolate) underground but the proposed SuDS for H29 development will instead be pumping water up and out of the area.

It has already been recognised that soakaways are not effective enough drainage due to the fact that the drained surface water meets the underground water about 1m below ground level, so pumping the water has been put forward as an alternative solution. However with the connection between surface water and groundwater being made, the pumping of this surface water will include groundwater that has risen to the surface and the SuDS will be attempting to pump it up and out.

Furthermore, as the site is 'affected by tide locking', this endless supply will be exacerbated during high tides, spring tides, low pressure storm systems, rising sea levels and in particular, high levels of rainfall (all events that are further amplified with climate change).

Subsidence

The continual pumping, disturbance and extraction of groundwater is a known cause of subsidence. This is a potential issue for this site (H29). Already on Hayling, there has been drainage, water supply and sewerage infrastructure breakdown due to old pipes cracking due to the superficial deposit movement. Sink holes developed under the A3023 in the location of the burst water pipes in 2019.

Rate of Overflow

Post development, holding the combination of ground and surface water onsite is not possible - especially in the winter. In any case, once the capacity of the onsite attenuation pond has been reached, any additional water then entering the system will initiate the overflow measures and will need to be moved offsite at the same rate it enters to avoid flooding.
For example, during a rainstorm, once the attenuation pond reaches capacity, the SuDS will need to move water offsite at the same rate and volume that the storm is generating.

The vast volume and rate of this overflow will overwhelm any filtration system allowing unfiltered water into offsite areas. Not only will this contaminated water reach Langstone Harbour, it will destroy the saltmarsh and other natural pond habitats by forcing them to accept water containing decades of farming fertiliser along with pollutants and nutrients from households and building processes. This is similar to what happens to Southern Water's raw sewage after high rainfall in what some describe as a 'licensed discharge', others would describe this as a reasonably foreseeable failure of planning and insufficient infrastructure capacity - certainly not a starting point for development.

Suitability

This SuDS might well be suitable inland and away from any groundwater systems but pumping a site that: is coastal and known to be tide locked; is a surface water 'reservoir'; has groundwater systems close to the surface; is surrounded by previously untouched habitats that are sensitive ecologically which the SuDS is to overflow into, seems highly inappropriate.

Offsite Impact

There are huge ramifications of the SuDS for ALL adjacent **offsite** areas:-

- to the North East, the saltmarsh will be destroyed by the polluted and nutrient rich overflow from the SuDS
- to the North West, Langstone Harbour will be receiving this same nutrient rich and polluting overflow
- South and West homes will become reliant on the robustness of the pumping systems to avoid flooding as their drainage will be linked to the H29 site.
- to the East, the Hayling Billy Trail will be impacted by changes to the saltmarsh and will also become reliant on the robustness of the pumping systems.

The use of Langstone Harbour (Sinah Lake) as the destination of this overflow is clearly

undesirable. It is surprising however that if this is to be the destination of the water, why is the overflow directed 1st into offsite untouched areas such as the ancient pond and saltmarsh. This site has a long boundary with the harbour, if filters were good enough to prevent contaminated water moving offsite then why not drain straight out into the harbour? It is both needless and unacceptable to destroy these offsite areas simply to hide the uncomfortable truth about the final destination of this overflow.

It is also highly likely that these changes to the Flood Risk Assessment are yet to be reviewed by consultees such as Natural England, Environment Agency and the Langstone Harbour Board - the change from first believing that Southern Water would likely deal with the overflow, to the plan now being to direct flow offsite to Langstone Harbour has clear ecological consequences.

A few other points that need addressing:-

- there is no clear future management of SuDS system lined up
- Southern Water has not taken responsibility for this system so the presumptions of the consultees have not been realised and they therefore need informing
- As the level of the harbour and the level of the water within the site are linked, pumping one into the other may well prove futile in reducing the amount of water in the site

Summary of potential Effects

Potential Effects of the Proposed SuDS	**Cause**
Direct discharge into Langstone Harbour SPA, RAMSAR (nutrient neutrality etc.)	SuDS will overflow into Langstone Harbour with polluted and nutrient rich water, full of man-made contaminants. In order to prevent flooding, discharge will need to be at such a rate as to overwhelm any filtration in place (similar to Southern Water's discharge of raw sewage directly into Langstone Harbour post rainfall)
Ecological disturbance to offsite pond	SuDS will overflow into this untouched pond with polluted and nutrient rich water, full of man-made contaminants forever changing the ecology of this area (has there been a survey of this pond to ascertain the ecology and potential protected species such as great crested newts etc?)
Ecological disturbance of offsite saltmarsh	Drainage channels for the SuDS overflow will allow seepage into the adjacent saltmarsh with polluted and nutrient rich water, full of man-made contaminants forever changing the ecology of this area

Subsidence and sinkholes affecting buildings and infrastructure (onsite and offsite)	Possible compromise and movement of the clay layer from the effects of pumping that draws up previously confined fresh groundwater to the surface along with squeezing and pressure changes driven by tide locked bodies of water
Flooding of adjacent properties	Currently the field holds on to a vast capacity of water post rainfall which will be replaced by hard surfaces. Should any part of the SuDS fail or a blockage occur in the drainage channel, properties on and around the site will be flooded
Flooding of Hayling Billy Trail and bird refuge	Currently the field holds on to a vast capacity of water post rainfall which will be replaced by hard surfaces. Should any part of the SuDS fail or a blockage occur in the drainage channel, the nature trail and bird refuges will be flooded with man-made contaminants
Mosquito population will increase	The onsite attenuation pond will likely provide the perfect environment for mosquitoes to thrive, exacerbating an existing issue. If this attenuation pond is treated with pesticides to control mosquitoes, this will contaminate surrounding refuges and sensitive offsite ecology (Billy Trail, offsite pond, saltmarsh, Langstone Harbour etc.)
Ongoing management fees	To keep this development feasible, the SuDS will need to continually function creating reliance and requiring significant and ongoing management and maintenance costs.
Legal action and consequences	Should any surrounding properties be detrimentally affected by the reasonably foreseeable impacts of this SuDS, residence of adjacent properties will no doubt pursue legal action

SuDS is found to be unworkable post development	If there is found to be a fundamental inability to overcome the practicalities relating to: the relationship in water levels between Langstone Harbour, field groundwater and surface water or simply the effect of sea level rise and climate change; then the ramifications could be disastrous for not only the surrounding community but financially for the entire borough

Articles that may be of interest
https://www.nature.com/articles/s41598-020-60762-4
https://theconversation.com/squeezed-by-gravity-how-tides-affect-the-groundwater-under
-our-feet-74928
https://en.wikipedia.org/wiki/Groundwater-related_subsidence
https://projectblue.blob.core.windows.net/media/Default/Imported%20Publication%20Doc s/Field%20drainage%20guide%200818.pdf

Anne Skennerton's letter to Alan Mak re Havant Borough Council's Indicative Development Management Council meeting on 29 October 2020

Mr. Alan Mak, MP,
House of Commons,
London SW1A 0AA
alan.mak.mp@parliament.uk

Mrs. A. Skennerton,

Hayling Island,
Hampshire.

November 13th 2020

Dear Mr. Mak,

I am writing, on behalf of residents, to express profound concern that key elements of 5 residents' and Cllr. Satchwell's Deputation arguments were neither understood nor meaningfully answered at Havant Borough Council's Development Management Council (DMC) on October 29th 2020.
Fundamental issues were either inaccurately referred to or dismissed as irrelevant despite resident Deputees' factual evidence. Councillors' own words during that debate and even during the vote, state that the vote was being driven by "the threat that hangs over us all" of central Government's self-evident policy to approve housing developments even against a local council's carefully considered view that a site is unsustainable. To bolster this argument, Cllr. Guest, present and on the DMC, even stated that Councillors must follow their officers' recommendations, and Councillors' "obligations are to central Government of which we are a part" and central Government policies require intensive housing developments. It was refreshing to hear Cllr. Lloyd remind her fellow Councillors that Councillors "are here to represent the residents of the borough" and that the many conditions and unsuitability of the site's location made her reject the Application after rigorous examination.

As an experienced and conscientious Member of Parliament, I am sure that you share your constituents' concerns for the well-being of Havant and in this case particularly the vulnerability of Hayling Island. You are doubtless aware that, constitutionally, Members of Parliament in the UK are elected by voters " to represent [voters'] interests and concerns in the House of Commons."
"MPs look after their constituency and their constituents. In the British system... they tend to take the welfare of the constituency and of the constituents, whether or not they voted for them, seriously." Whilst you may not wish to be involved in local planning issues (re your email to me 28- 10-20), in this case it is clear that we, your constituents, have taken our concerns to our Council but that these were not rationally debated. Instead the majority approval was dictated by their fear of being over-ridden by the Secretary of State with no subsequent control of Section 106 and CIL Developer funding agreements. How can this be reasonable or even democratic when this layer of representation is effectively stripped of meaningful action?

On Hayling our local physical, geographical and environment constraints (to which you allude in your email to me 28-10-20) have already become severely strained, partly as a direct result of steadily increasing housing numbers and population activity, partly resulting from corresponding diminishing jobs on the Island. As I very clearly set out in my Deputation, there is no evidence that Havant, including Hayling, can or will provide the jobs for its current population let alone the Government desired future population increase. House-building jobs are finite and

short-term, even adding to the gridlock on our single access road on which our 17,000 permanent residents plus 5,000 annual tourists rely for everything. There are no definable correspondingly high number of jobs in the proposed Local Plan.

Equally the Hayling Island Transport Assessment is seriously flawed. Within Hayling Island Infrastructure Group, that includes Hayling Island Residents' Association, Save Our Island Group and an independent roads' expert Professor Nick Hounsell have spelled out its short-comings to our Council. The Council does not have the moneys now, even to make the proposed, but widely viewed as insufficient, alterations of roundabouts and lights to our single access road on/off the Island. As for the dramatic rise in Hayling's coastal erosion that has, in one year, exceeded even Coastal Partnership's (previously named ESCP) 20 year forecast, there is no Government money for flood protection – beyond our single road bridge – nor can our Council wait until the Partnership's planned coastal management strategy in 2022, because they fear that the Government will impose its national agenda.

I ask you to take our concerns to our Government and encourage Ministers to hold back such planning interventions where constituents and brave Councillors make rational, evidence-based arguments for limitation of house-building numbers. Sadly a few Havant Borough Councillors are in favour of over intensive house-building. We also know that building substantially more, expensive homes draws in more people to the area who are neither local nor in need. They will continue however to add to the current traffic congestion throughout Havant and our southern region, which itself cannot be remedied and adds to air and run-off pollution. What price owning a new home when congestion blocks the new owners' basic transport needs and infrastructure needs cannot be remedied in advance if at all?

I have attached 6 Deputations from local residents so that you can read the quality of research each has undertaken but which was only taken up by one Councillor who rigorously questioned the appropriateness of the housing development in question; sadly only one additional Councillor had the courage to make the rational 'no' vote to the Application.

Our residents eagerly look forward to hearing the answers to your representations of the foregoing concerns to central Government on our behalf. Please note that this is an Open Letter and will be sent to the individuals listed below, because I and the joint signatories believe that this is an issue that affects many other constituencies and their towns. We recognize that this requires demonstrable and ongoing work particularly by our elected representatives.

Yours sincerely,

Anne Skennerton
Chair, Hayling Island Residents' Association

Joint Signatories:
Cllr. Clare Satchwell, Hayling Island
Dave Parham, Hayling Island
Rosie Law, Hayling Island
Mike Owens, Hayling Island
Robin Davison, Hayling Island

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