

Our Ref: DJF/EVC/31000.10

Your Ref:

FOR THE ATTENTION OF MRS D HAYWOOD

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BY EMAIL (PLANNING.DEVELOPMENT@HAVANT.GOV.UK), BY POST

Dear Madam

**Hayling Island Sailing Club Overflow Car Park, Sandy Point, Seafarers Walk,
Hayling Island
Application Ref: APP/19/01141**

We have now had an opportunity to review with our client the updated application information provided on 26 January, including the updated management plan.

Our client rejects the suggestion that complaints and objections to this proposal are based on a misunderstanding of the proposal. Furthermore, to the extent that matters beyond the 28 days of overnight parking have been raised they remain relevant as a material considerations in the context of the management arrangements already in place and proposed in the future.

As a specific example, the dates for overnight use in 2019 are quoted. A similar list of dates for 2018 was provided to my client as a neighbour which did not include 9 June 2018. However my client observed a vehicle (for which the registration number has been recorded) parked overnight on that date. If the records supplied are inaccurate then the purpose of the management arrangements is undermined.

In addition, a camper van accessed the car park overnight on 31 December 2019 after dark and camped overnight; this is despite the locked gate.

We are instructed that both of those occurrences (which are amongst many logged and reported by my client) were able to happen because sets of keys are available to members for the gate. Indeed we understand there may be at least six sets of keys issued to members with motorhomes; this contradicts the statement that motorhomes are not permitted. That restriction having been imposed in July 2018 but relaxed in October 2018 (without a wide consultation) to allow these existing members with campervans to bring them on site on an occasional basis and specifically to use the overflow car park. The widespread key-holding

completely undermines and defeats the object of the locking of the car park and undermines the 28 day limit.

My client can also place no reliance on the club's internal policies if they are not regulated by the planning permission and are subject to change, relaxation and waiver by the club.

The management plan states that the update to it was to be approved by the committee on 25 January but we are instructed that this did not in fact take place. This management plan therefore has not yet been agreed by the club. Even if it was, it is woefully inadequate. In particular:

- The gate locking arrangements are completely undermined by the number of keys in circulation.
- The locking of gates has not in the past prevented use on days outside those designated and there is no indication as to how it will now be different.
- In point 4 of the plan, the reference to the use of a 'gateman' does not reflect our client's experience. We believe the club may have had difficulties in recruiting and retaining a gateman.
- In point 8 of the plan, the final sentence is unfinished and in any event the outlined position has not been the case in the past. Until there is someone to contact and those details have been provided there is no certainty that this management plan can be effective.

As noted before, the club has failed to comply with conditions in this permission and in its Natural England licence. The club actively admits to having breached the existing management plan. It is essential that it is held to better standards and given the history of failure, a permanent right to use would be premature until the club can demonstrate compliance.

We therefore maintain our client's objection and ask that:

1. The council makes clear that the management plan is insufficiently robust and requires a new plan to be submitted and approved before the first overnight stay this year. That would give the club ample time before the 23 May Whitsun HISC Regatta.
2. The management plan should indicate designated key holders and only those key holders shall be allowed to have keys. If this requires new locks given the existence of other keys at the moment then that must be done.
3. Stricter controls be put in place for advanced notice of events and retrospective reporting to the council to allow complaints to be cross checked.
4. Better arrangements for out of hours contact and a formal complaints investigation and handling procedure for which records must be kept.
5. Overnight stays on the rest of the club estate be prevented.
6. That caravans, campers and motorhomes be prevented on the club land. This is directly related to the subject of this application because the experience to date demonstrates that overnight parking and stationing of boats encourages overnight stays in the vicinity. This therefore does satisfy the requisite legal test for the imposition of a condition.

7. The permission again be granted on a temporary basis to allow proof of the effectiveness of the management arrangements.
8. The conditions proposed by the Chichester Harbour Conservancy be included in the permission.

Yours faithfully



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