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Mr. David Eaves
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Sent via email to David.eaves@havant.gov.uk

11th November 2025

Dear David,

Re: Land off St Mary's Road, Hayling Island (Rook Farm) – Havant BC Ref APP/21/01434

I write with reference to the above planning application for Land off St Mary's Road, Hayling Island (Rook Farm) and the further work that we have been undertaking to address all outstanding technical matters.

We are pleased to advise that this additional work has now been completed, and that we are now in a position to formally submit the following documents for your consideration and re-consultation:

- Replacement Environmental Statement and accompanying appendices
- Updated Noise Assessment
- Updated Development Framework Plan

The submission represents the culmination of the dialogue that has taken place with Hampshire County Council and National Highways to complete the additional highway modelling work that had been requested in connection with the proposals. This builds on the previous correspondence that has taken place with Havant Borough Council's ecologist and Natural England to finalise a suitable Brent Goose Mitigation Strategy for the development.



A brief description of the documents and updates that are now being submitted for the Council's consideration is provided below.

Additional Highway Modelling Work

Following receipt of Hampshire County Council's (HCC) and National Highway's (NH) formal comments on our application submission, we have been engaged in an additional highway modelling exercise to assess the effects of the application proposals on the local highway network. This has been in accordance with a methodology agreed with HCC and NH, using Havant Borough Council's baseline microsimulation model, assessing the proposals in both neutral and summertime scenarios.

The completed modelling now demonstrates that the application proposals would not have a detrimental impact on the operation of the local highway network in either assessment case. This also is when viewed both individually and collectively with the pending application proposals for Fathom's Reach (APP/21/00001) and Land north of The Oysters and South of Saltmarsh Lane (APP/21/01350 and APP/21/01351). In the context of paragraph 116 of the National Planning Policy Framework (the Framework) the modelling work shows the impact of the proposals would not be 'severe'.

In this context, we note that the findings of the completed modelling work have already been formally considered by HCC in connection with the latter applications listed above. In this regard, the County Council's consultee comments, dated 22nd September 2025, confirm that they have no objection to either proposal subject to planning conditions and S106 obligations.

As explained in HCC's comments, this conclusion is based on a cumulative assessment that also takes account of our application proposals for Rook Farm. On the basis, it is assumed that this same position can now be reached in response to our application submission. This is noting that National Highways have already formally confirmed that they do not object to our planning application in their 3rd September 2025 response.

The findings of the modelling work are presented and discussed in the Transport Assessment (TA) provided at Appendix 8.1 of the submitted Environmental Statement.

Additional Highway Technical Work

Alongside the highway modelling exercise, the updated Transport Assessment provided at Appendix 8.1 to the ES also summarises the additional work that has been undertaken to resolve all outstanding highway design matters.

This includes the results of additional swept path analysis for the proposed site access arrangements, confirmation that the proposals will not adversely affect the operation of the

engineering business that adjoins the application site's north-eastern boundary (at the request of HCC) and other minor design alterations to works proposed in the vicinity of the access on St Mary's Road. We understand that the access proposals are acceptable to the local highway authority in principle, and the above additional work confirms this position.

Finally, although not strictly a technical matter, through our discussions with HCC, the highway authority have requested that a potential pedestrian/cycle connection to the application site's northern boundary is accommodated by the proposals. For completeness, this connection has therefore been shown on an updated version of our Development Framework Plan (DFP).

Environmental Statement

In accordance with the Council's Screening and Scoping Opinions, our application proposals were accompanied by an Environmental Statement. To ensure the additional work that has now been undertaken is appropriately reflected in the EIA process, a replacement ES has also been prepared for submission alongside this work.

Alongside updates to take account of more recent policy, guidance and legislation, in the context of the application proposals the main updates to the ES technical chapters are briefly highlighted below. In this context, for ease of reading it was determined that a replacement ES would be preferential to an ES Addendum that would then need to read alongside/cross referenced against the original ES document. The updated ES replaces in full the earlier ES, dated December 2021.

- Chapter 6 – Air Quality – updated to reflect and take account of the latest highway modelling outputs.
- Chapter 7 – Ecology – updated to take account of the finalisation of a Brent Goose Mitigation Strategy and background ecological survey reporting.
- Chapter 8 – Transport – updated to account for the completion of the additional highway modelling work.
- Chapter 10 – Water Environment – revisited to align with updated flood data, policy and legislation.

The main ES document is also accompanied by a suite of technical appendices. Accompanying the updated Transport Assessment highlighted above, these include an updated Framework Travel Plan (ES Appendix 8.2) to align with the TA's contents, an updated Flood Risk Assessment to take account of more recent data and policy/guidance (ES Appendix 10.4), as well as a suite of updated ecology documents provided at ES Appendices 7.1 – 7.4.

The latter includes an updated Ecological Impact Assessment (EcIA) that principally reports on the findings of an updated suite of ecology surveys (no change to the previously reported position), a Project-Stage Biodiversity Net Gain Assessment and updated Information for Habitats Regulations Assessment, whose contents overlap with the finalised Brent Goose Mitigation Strategy, and the finalised Brent Goose Mitigation Strategy itself. Save for confirmation of the discussions that have taken place to identify a future management body and minor updates to account for background evidence/policy changes, the Mitigation Strategy is essentially the same document that has been seen and reviewed by the Council previously.

Finally, for ES reporting purposes, a Parameters Plan has also been prepared. This is provided at ES Appendix 1.2 and save for showing the aforementioned potential pedestrian/cycle connection to the application site's northern boundary and indicative locations for surface water pumping stations (that have also been added to the latest version of the DFP that has been provided), the Parameter Plan mirrors the DFP that has already been seen by the authority.

As requested, a hard copy of the ES has been made available and sent to the Council by post. This also includes an ES Non-Technical Summary (NTS) document.

Noise Assessment

Separate to the submission of the Environmental Statement, for completeness an updated Noise Assessment has also been provided in response to comments from the Council's Environmental Health team, who sought confirmation that noise levels from the engineering works proximate to the application site's north-western boundary have remained static since previous surveys were undertaken.

The updated Noise Assessment demonstrates that this is the case, and that noise from the engineering works or any other source would not pose a constraint to the application site's development.

Description of Development

Coinciding with the submission of the above updates and the accompanying re-consultation exercise, we would also request that a minor amendment is made to the current description of development for our planning application.

Reflecting the fact that an existing agricultural building will be removed as part of the development of the application site, we would also be grateful if this could be accounted for in the development description for completeness at this stage. The revised description would read as follows:

“Outline application for the development of up to 300 dwellings (including affordable housing). The proposal includes provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage system (SuDS); a new vehicular access from St Mary's Road; associated ancillary works; and the demolition of an existing agricultural building. All matters reserved except for means of vehicular access. Accompanied by an Environmental Statement”

The removal of the agricultural building has always been accounted for in the submitted application documents and is not a new feature of the proposals. We would be grateful if the updated description could be reflected on the application file accordingly.

Building a Better Future Plan

Finally, as you are aware, as a site promoter with active interests on Hayling Island, we were invited to attend the authority's 28th April 2025 briefing on the Council's emerging Local Plan position in respect of further greenfield development on the Island moving forward.

Due to perceived risks associated with flooding to the A3023 Langstone Bridge, during this briefing it was explained that the Council would not be directing any additional greenfield development to Hayling Island as part of its emerging Local Plan proposals. This stance was subsequently reflected in the Council's Building a Better Future consultation document.

Noting that paragraph 49 of the Framework provides guidance on the weight that can be attributed to emerging Local Plans in decision making, we must advise that our overarching view is that the Council's emerging policy position on this topic is not justified. We do not believe that there is a basis for directing development away from Hayling Island connected to this point, that this constitutes a Framework footnote 7 policy, or that this should be deemed to represent a reason for withholding planning permission in respect of our application submission.

Next Steps

As detailed above, the updated documents have been prepared to address all outstanding issues associated with the application. We would be grateful if they could now be issued for re-consultation with statutory consultees.

Should you have any immediate questions in relation to the updated documentation or the contents of this letter, please do not hesitate to contact me on the details provided below.

Your sincerely



Peter Dutton

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