

OBJECTION TO APP/21/01434

Rook Farm, land off St Marys Road, Hayling Island

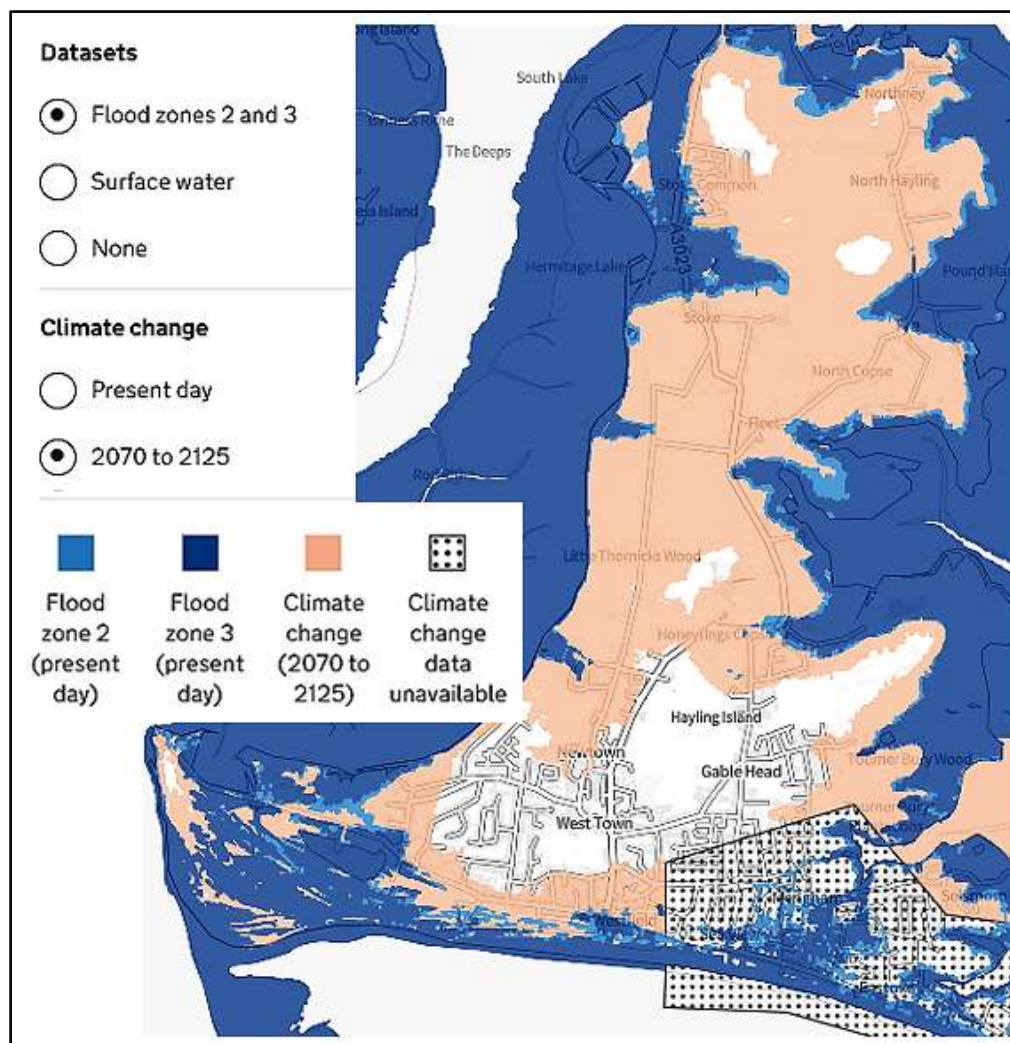
Outline application for development of up to 300 dwellings (including affordable housing).

THIS OBJECTION IS BASED ON TWO MAJOR DEFICIENCIES IN THE APPLICATION: CLIMATE CHANGE AND BIRD MITIGATION

Since the planning application for 300 homes at Rook Farm APP/21/01434 was submitted by Gladman, there have been a number of significant changes to the plan and the environment which now require additional review and comment.

CLIMATE CHANGE

The original Rook Farm development application made by Gladman in 2017 (APP/17/00007) was refused by Havant Borough Council. This second application APP/21/01434 from Gladman (which is now owned by the Barratt Group) was submitted in 2021, three years before the revised Environment Agency Flood Risk Analysis and Mapping process was made available. <https://flood-map-for-planning.service.gov.uk> As a result of this flood risk re-evaluation, the majority of Hayling Island is shown to be at high flood risk during the National Planning Policy Framework's sustainable lifetime requirement for this development – a period of 100 years minimum. See map below.



Havant Borough Council correctly determined that no housing allocations would be made for Hayling Island in the new Local Plan which is currently under development as the Island can no longer support any additional housing as a result of the identified flood risk forecast by the Environment Agency.

Although the site for this development is not in a Cat 3 flood zone, it is surrounded by land which is in a Cat 3 flood zone, and areas which will be in the future Climate Change flood zone. Therefore the impact of any flooding will be felt on the site during periods of flooding in the same way as the surrounding area:

- Road access to and from the Island will be curtailed
- The intra-Island road network will be unusable
- Emergency services - fire, ambulance, utilities – will be unavailable
- Drainage and utility services will be severely disabled
- Access to schools, primary care, shops, churches will be unavailable during the duration of the flooding

There is no identified need or justification in this application for this development in a high risk, contracting, and vulnerable island environment. This application does not satisfy the NPPF requirement for 100-year sustainability, and furthermore would just add to the burden on the Local Authority to manage the adaptation measures which will become more important over time to ensure the health and welfare of the Island community as sea levels rise.

Gladman, in their letter dated 11 November 2025 to Havant Borough Council stated:

“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 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.”

This is a bold position statement which is not supported by any factual evidence. The high risk of flooding to the whole of Hayling Island is in the public domain and is known to Gladman. The facts related to the flood risk to the Island community are provided by the Environment Agency Flood Risk Mapping, which presents the high risk to the Island in a clear and concise way ... and this is irrefutable.

BIRD MITIGATION:

APP/21/01434 now includes a mitigation programme for the key issue of birdlife protection.

The Rook Farm site is a Natural England Core Site (H46B) for overwintering Brent Geese. The applicant records some low numbers of geese present, but as we all know numbers are dependent on the crop rotations that can take place at any point in time. The applicant proposes to move the birds from the Rook Farm site to two fields on the west coast of Hayling Island as mitigation (H48C & H48D). See map below.



<https://solentwbgs.wordpress.com>

However, this does not represent a mitigation solution for three reasons:

Firstly, the two proposed mitigation fields are already Core Sites for Brent Geese. This is double-counting, which increases the population density and will have unknown consequences. But more importantly, it means that the total area for overwintering birds would be reduced by 45 percent !

Rook Farm Core Site H46B	11.86 ha
Mitigation Core Site H48D	7.64 ha
Mitigation Core Site H48C	6.96 ha

There is no justification in the Gladman application to support this drastic reduction in the protected habitat. It is hard to believe that Natural England would condone this proposed reduction.

Secondly, the coastline adjacent to the two proposed mitigation fields is owned by Hampshire County Council and is classified by Coastal Partners' Hayling Island Coastal Strategy as 'no active intervention.' This area of coastline is low-lying and has been overtopped in parts already. As a consequence, further uncontrolled coastal erosion is expected. This will lead to a rapid and permanent conversion of the mitigation areas to marshland, which would no longer serve as a suitable habitat for the Brent Geese. The application does not recognise this permanent habitat transition. No proposals for protecting the coastline from erosion are included or funded. A nearby example of this conversion of farmland to tidal marshland can be seen with the creation of Southmoor Nature Reserve on the north coast of Langstone Harbour. See picture below.



Thirdly, Gladman propose to maintain the mitigation area "in perpetuity" and have defined perpetuity for this purpose as 80 years. This does not even cover the NPPF lifetime requirement for this development at 100 years minimum. No justification is offered for this redefinition of the term 'perpetuity' given that 'perpetuity' ordinarily means 'forever.' This promise becomes meaningless as the mitigation fields transition to marshland.

In summary, the latest changes to this Gladman application do not provide any justification for this development on Hayling Island. The application remains unsustainable due to overwhelming environmental risks, and non-conformance to the NPPF. Additionally, the bird mitigation proposal is unsound.

APP/21/01434 for Rook Farm must be refused.