

Planning Application Objection: Rook Farm (APP/21/01434)

I am submitting this objection regarding **Planning Application APP/21/01434 (Rook Farm)**, which was amended on **11 November 2025**.

1. Flood Risk and Climate Change Impacts

The **Environment Agency (EA)** has revised its flood risk assessment for Hayling Island. Current projections indicate that **nearly the entire island is at risk of flooding within the next 100 years (to 2125)** due to climate change. Presently, only approximately **15% of the land area** is predicted to remain above projected sea levels.

It is important to note that **Environment Agency projections do not account for sea level elevations caused by low atmospheric pressure (the inverse barometer effect)**. On Hayling Island, a 1 millibar drop in pressure typically raises sea level by 1 cm; observed sea level increases of **0.5 m to 0.8 m** are already common today, with extreme future low-pressure storm events potentially increasing predicted seawater water levels by **1 m**. This **tidal barometric effect will occur in ADDITION to the EA's already dire projections**.

Groundwater levels within the site are also subject to tidally induced hydraulic head fluctuations due to hydraulic connectivity with the adjacent marine harbour environment both east and west of Hayling Island. In winter, Hayling Island's groundwater levels are often only **less than 45cm below the surface**, and near the Rook Farm site, they can **reach or exceed ground level**, causing widespread surface water flooding. These **tidally induced fluctuations are ADDITIONAL to the EA's risk analysis**.

The EA's current modelling **does not consider the COMBINED impact of low-pressure storm systems, high spring tides, and tidal groundwater fluctuations**, which would worsen the predicted flood risk. While the Rook Farm site is currently outside Flood Zone 3, it is **highly likely to be at significant risk within 100 years due to these combined impacts**. CMIP6 climate models indicate that **sea level rise is accelerating**, and future projections will very likely exceed current assessments

2. Impact on Infrastructure and Community Resilience

300 new homes means there will be approximately 750 new residents, 420 more cars on the road and that's a c.5% increase. Where traffic jams are common where it takes weeks to get a GP appointment. Where sewage and water utilities are seriously overloaded. Such a development requires significant infrastructural upgrades which are not currently planned.

Based on EA projections and local hydrogeology:

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- Hayling Island will become
- **effectively isolated**
- due to high sea levels, with **severed access from the mainland**
- **in several places on the arterial A3023** the only other egress/access from/to
- Hayling Island will be via a foot ferry to Portsmouth. Access roads to the Ferry and Ferry Point itself will all be underwater. Rook farm will be an island within a flooded island. Building an isolated community of 300 homes that according to credible EA
- data will be frequently imprisoned by seawater in less than 100 years time is irresponsible especially when motivated by profit.
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- Emergency services access (fire, police, ambulance) will be
- **seriously compromised**
- at times there will be no access
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- Supplies of food, fuel, and medical materials will be
- **severely disrupted**
- as these come from the mainland

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- Critical infrastructure, including the
- **medical centre and fire station,**
- will be **frequently flooded,**
- and **drainage/sewerage systems**
- may be inoperable for extended periods.

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Havant Borough Council's local plan **does not allocate further housing on Hayling Island**, acknowledging that the EA's projections indicate **unsustainable flood risk**. While a draft **coastal protection plan** is expected, current council and Coast Partners proposals rely VERY heavily on private landowner action and (non-legally binding compliance), all proposals lack guaranteed funding, and do not provide a coherent defence across the entire coastline. Consequently, the development **cannot be considered sustainable because access/egress protection from the sea cannot be guaranteed**.

3. National Planning Policy Framework (NPPF) Considerations

The NPPF requires that new development:

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- Ensures
- **safety, access, and egress**
- for at least **100 years**
- (it's "lifetime") in relation to flood and other environmental risks.

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- Accounts for
- **climate change projections, resilience**
- and credible sustainability.

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Building an **isolated community at Rook Farm**, essentially an island within Hayling Island which credible data indicates will be subject to severe flooding within a century, abjectly **fails to meet NPPF sustainability requirements**. Development motivated primarily by profit is both **irresponsible and unsustainable**.

4. Consultation and Notification Concerns

Under **Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015)**:

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- **Site notices**
- must be displayed on or near the site for **not less than 21 days**.
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- **Newspaper notices**
- must appear in a **local newspaper circulating in the locality**
- to ensure those with a legitimate interest can comment.
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- All documents and prior representations must be
- **accessible at the start of the consultation period.**
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- Consultation deadlines have been applied inconsistently HBC website, newspaper and street

- notices all have different dates. The planning portal website does not even have a consultation end date on it - a significant oversight!

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Havant Borough Council's disproportionate consultation process therefore raises serious concerns:

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3. Notification was limited to two
4. **street notices** at places of minimal footfall This is clearly insufficient for
5. a development of this scale which will impact the entire population of 18,000. Whilst even one notice is legally compliant, taxpayers best interests have not been served by Havant Borough Council
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12. **Hampshire Independent,**
13. the vehicle used by the council for it's newspaper notification, is **published**
14. **50 miles away** with
15. **just ten (10) copies**
16. accessible on Hayling Island in an anonymous shop in a different council ward, failing the "circulating in the locality" requirement. Especially non-compliant due to all 18,000 residents being impacted. This is potentially unlawful and will be

challenged.

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22. Historical planning application documents for this site, including

23. **1500+ prior resident representations,**

24. **were not made available at the start of the consultation**

25. to give context and other important aspects, clearly undermining informed participation.

26. It is simply unacceptable that an incompetent IT upgrade implementation could be used as any kind of excuse to preclude public access to these documents especially when they are not lost.

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These deficiencies **may render the councils consultation unlawful** and deny residents the opportunity to engage meaningfully, under the requirements of The Town and Country Planning (Development Management Procedure) (England) Order 2015. This will be challenged. It feels like the council has deliberately not applied proportionate notification to perhaps reduce the workload of officers at the expense of the best interests of taxpayers which is an injustice.

5. Legal and Planning Risk

It is likely that **Gladman WILL appeal a VERY likely HBC refusal**. Without careful and competent legal review, the council will likely be outmanoeuvred and overwhelmed due to:

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- Complex planning law and precedent. Overwhelming councils on planning matters is all
- Gladman lawyers ever do to support more profit for its shareholders
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- Reduced recent public representations (attributable to inadequate notification) will
- be available to government inspectors looking at the appeal.
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- Government priorities on housing targets, which may influence appeal inspectors.
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It is essential that Havant Borough Council ensures **compliance with all statutory consultation requirements** and robustly addresses every legal and planning vulnerability. It can do that by looking at historic Gladman legal success in this regard of which there are many well documented cases. My fear is cost considerations will prevent a competent defence, something that is not a consideration for Gladman's massive legal machine.

6. Conclusion

Given the **significant flood risk, unsustainable isolation and non-compliance to NPPF** Planning Application **APP/21/01434 (Rook Farm)** must therefore be refused.

The development:

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- Fails to meet
- **NPPF sustainability requirements.**
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- Exacerbates
- **climate change and sea-level risk**
- beyond EA predictions.
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- Threatens
- **public safety, infrastructure, and community resilience.**

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- Has been subject to
- **inadequate consultation and notification**
- in potential breach of **DMPO 2015.**

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Therefore, this application should be **rejected** in the interests of public safety, legal compliance, and sustainable development.

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Best Regards



