

Planning Services
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Application Number: APP/21/01434
Site Address: Rook Farm, land off St Marys Road, Hayling Island

Dear Sir/Madam,

Thank-you for your letter of 3 December 2025.

I object to this application for the reasons listed below.

Summary

Many of us attended the meetings where the new local plan was rolled out. It was great to finally see the acceptance that Hayling Island is not suitable for large developments.

Notes from the draft local plan:

'Notably, the plan has avoided making development allocations on Hayling Island, due to the current risk of tidal flooding to the single access road onto the island, which is predicted to increase with the effects of climate change on sea levels.

In line with the Spatial Strategy (Policy 1), the council will give special consideration to the risk to the access route to and from Hayling Island since it is the only road route available. The risk to this route is significant, particularly in the climate change scenario. As a result, additional greenfield residential development is not considered appropriate on the island.'

Soon after these meetings I received your letter asking me to comment on this proposed development.

There are many documents to read, but nothing has been said that gives a compelling argument that this development should proceed. Many of the documents are lengthy, complex, use statistical modelling, etc. but seem to ignore what the residents of Hayling see every day: Flooding, traffic congestion, inadequate transport alternatives, low employment opportunities, destruction of our seafront, raw sewage being pumped into the sea. In the news we hear of global warming rapidly rising faster than scientific predictions and sea levels rising.

There is no logic in building 300 homes where the impact will only negative, except for meeting Government housing quotas.

The changes proposed by this development are not in line with Government guidelines for sustainability and would be irreversible, potentially causing lasting damage.

The proposed Rook Farm development site appears to be within the defined urban area for Hayling, but this does not alter the fact that it is prime agricultural land and a haven for wildlife and Brent Geese. No explanation has been given as to how this proposed development is not in direct conflict with the points raised in the local plan.

1. Brent Geese – Core site

Rook Farm is a core site for Brent Geese, and nothing has changed. The use of the site varies, depending on what crops are being grown, but plenty of evidence has been provided that the geese use the field in their hundreds.

There is some detail provided in a report about a possible proposed refuge site, but it is also farmed and used by the birds already. The proposed site is exposed to flood risk.

The report states that both sites – i.e. Rook Farm and the proposed refuge site are important parcels of functionally connected land. I understand that this means that both sites are important for the populations of Brent Geese that visit us.

If the Rook Farm site is developed, and we end up just relying on the proposed refuge site, then not only do we lose two sites of important farmland but we also lose one site that it is regularly used at the same time as the refuge site so the options for the geese have been halved.

The report also states that the Rook Farm site is subject to disturbance by dog walkers and that the proposed new site would be free from vandalism, trespass and antisocial behaviour. I have personally observed hundreds of Brent Geese happily grazing for hours on end at the Rook Farm site without any of the above disturbances affecting them.

2. Loss of grade 2 and 3a (BMV) Agricultural land

The site is designated grade 2 and 3a, i.e. Best and Most Versatile farmland and it is used to produce crops annually. My understanding, from government guidelines, is that there has to be a compelling reason to convert such land, but I have seen nothing to justify this. So, the planning application is in direct conflict with government guidelines and with the draft local plan. In addition, we will see a loss of farmland if the proposal for the Brent Geese refuge site is taken up.

3. Access to and from the site

The proposed access has always been an issue of concern around safety, congestion and access to the main road. I cannot see that anything has changed, there is still a pinch point at the back of the pub that causes issues. The junction is already very busy, and the influx of hundreds of extra vehicles will make this worse.

National Highways have decided there is no objection after having previously rejected the application several times, but their response is caveated, saying that new developments should offer a shift away from car travel and should offer a genuine choice of alternative transport modes. Nothing has changed in this respect, so an already congested and potentially unsafe situation will be made worse. The decision is also in conflict with the draft local plan which recognizes the issues caused by Hayling's roads. Although the proposed development is south of Mill Rythe roundabout it is impossible to see how more weight of traffic will not have an impact.

It would be very helpful, for a layman like myself to see a summary that says why the access was previously rejected and unacceptable and now is ok. It would be helpful to understand why this decision is reversed rather than having to interpret (as I have attempted) many technical documents.

One of the documents talks of removing a protected tree so that a new section of pavement can be created, but this is some distance from the proposed entrance to the development and would not alter the pinch-point at the back of the pub. So we end up losing a nice tree and gain some extra and unhelpful pavement.

4. Transport Assessment

The local plan recognizes the risk caused by the single road and the risk of flooding and concludes that there should be no further development. The local plan also recommends that Hayling should be further developed for tourism. So, an overloaded road will become even worse for residents, with the knock-on effect of traffic jams going back into Langstone and Havant.

The transport assessment in the planning application ignores this and seems to imply that cycling and use of Hayling Ferry will alleviate these concerns.

The transport assessment states that Hayling has 'cycle friendly topography'. Just because Hayling is flat does not mean it is a 'friendly' place to cycle. Cycling on or off the island on the roads definitely results in major tailbacks, frustration and occasional unpleasantness from drivers. There is no doubt about this because I have been on the receiving-end of verbal abuse and near-misses many times. The improvements to small areas of the Billy Trail are welcome but are nowhere near sufficient to promote the track as a viable route for regular, safe, use. Even during dry spells, the track is bumpy, muddy and risky in terms of skidding on loose gravel, punctures, dogs, people/children and it is pitch-black at night. A new cut-through to West Lane is useful, because it avoids the boggy areas at the bottom of the Billy Trail, but it is surfaced in aggregate, which is extremely messy when wet and promotes punctures, i.e. not viable for high volumes of cycle commuters.

The Hayling Ferry has had financial difficulties previously, has been out of service for months at a time, and its services are subject to weather conditions. It is great when it is running but it is not a properly viable commuting option. The road to the ferry is not cycle friendly, and there are not any other public transport links on the Hayling side. The ferry has been running for decades so claiming that this option will alleviate main road traffic is wrong.

Employment opportunities on the Island are very limited so the only properly realistic options for regular commuting to work is off the island via car or bus – both of which use the single road. Nothing is being done to change this, and the local plan accepts this fact.

5. Sewage – foul water

One of the documents submitted, from Southern Water, states that there is inadequate capacity in the foul water network to support this development and that capacity would take greater than 24 months to be put in place. This is no surprise as we are all aware of the raw sewage being regularly released into the sea. Given Southern Water's difficulties coping with current demand I would suggest that the provision of extra foul water capacity for Hayling Island is low priority and possibly decades away.

6. Surface Water drainage

Drainage of rainwater was identified as a concern when the houses in Rook Farm Way were built. Extensive drainage was incorporated into the build, with much of the surface water being channelled into ditches around the field, and this was just for 14 houses. It is a fact that the south part of the field becomes very waterlogged after heavy rain, with standing water in place for weeks. Placing 300 new homes into this area will add a huge burden to surface water drainage infrastructure.

The latest flood risk assessment says any risk is negligible, but the plan shows two attenuation basins with pumping stations and access required for tankers. I understand that SuDS systems are recommended for new developments but there is also evidence that SuDS systems fail due to poor design, ownership and maintenance. We know that something went badly wrong at the Sinah Lane development when it flooded after heavy rain. The reasons for this are not known to me but it is an appalling start for a new development.

The National standards for sustainable drainage systems says that the use of pumping within surface water drainage systems shall be by exception only due to the associated carbon, energy and maintenance implications. Pumping requirements section 1.24. Yet the draft plan shows the use of pumping stations with Tanker access. It very concerning that this is considered to be necessary from the outset.

It is clear that the Rook Farm field, as it stands, acts as a huge soakaway for the surrounding built-up areas. Covering this field in houses and then relying on ponds, pumping stations and tankers is at odds with sustainability and common sense. If the calculations are wrong, then this presents a huge flood risk to the surrounding estates.

7. Wildlife

The reports provided indicate that there will be a reduction in biodiversity. The field is visited by birds, bats, deer, owls, hedgehogs, foxes, etc. The reports state, for example, that it is illegal to destroy the nesting habitats for Bats and certain birds. I could not find any details of how these habitats will be protected.

Conclusion

Since the last application for development of Rook Farm was rejected, the local plan was produced stating that there should be no more green field development on Hayling.

There is no compelling argument to build this development, with the overall permanent impact being far more negative than positive. The development is not useful to Hayling Island or Havant. Concerns around farmland, the environment, wildlife, infrastructure, transport, congestion, employment, and flooding have not been addressed in a way that is sustainable for Hayling's long term future. The overall impression is that a 'sticking plaster' approach is being taken to each serious concern, such that the proposed development can be pushed through, without a real concern for the future impact.

As per the local plan, Hayling does not need this development, the impact will be overwhelmingly negative. On this basis I recommend that APP/21/01434 is rejected.

Yours Sincerely

