

13 April 2022

Rt Hon Michael Gove MP  
Secretary of State for Levelling Up, Housing and Communities and  
Minister for Intergovernmental Relations  
2 Marsham Street  
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Sent via email to: [correspondence@levellingup.gov.uk](mailto:correspondence@levellingup.gov.uk)  
Confirmed by Registered Post 13.4.22

Dear Secretary of State

**POTENTIAL HARM TO HAYLING ISLAND RESIDENTS  
AS A RESULT OF THE WITHDRAWAL OF THE HAVANT BOROUGH COUNCIL LOCAL PLAN**

We the undersigned are writing to you to give you the Hayling Island residents' perspective on Havant Borough Council's (HBC's) situation following the withdrawal of their Local Plan, a decision based on the recommendations made by your Inspectorate late-summer 2021 which resulted from the Local Plan Examination.

We would ask that our views should be read in context of the environment existing on the Island:

- Hayling Island is a unique, small, low-lying island of some 18,000 residents. It has a single road/bridge access route which experiences heavy congestion throughout the summer months. There are no economic options for expansion, and there are no alternate routes available. The bridge was closed for a period in January 2022 as a result of a tidal storm. This cut off all emergency services for a number of hours. These events will become more frequent.
- The entire Island shoreline is below the Environment Agency's 2100 high-tide forecast level of 4.8 mtrs AOD, and less than 20% of the coast qualifies for Central Government protection funding. In addition, approximately 50% of the Island's landmass is designated as Flood Zone 3, and the access road is routed through four of these Flood Zone 3 areas. The Island is bordered by the harbours of Langstone and Chichester, which are considered by Natural England to be of poor seawater quality – and getting worse. There has also been a massive loss of intertidal saltmarsh due to disease/pollution. The southern beachfront experiences serious annual flooding events and uncontrolled erosion – this erosion at West Beach is forecast by HBC to exceed 100 mtrs by 2100, and this forecast is based on the 1.4 mtrs EA predicted tide rise and the 1.5° temperature increase being achieved. Only the Eastoke peninsula receives protection funding for its annual shingle bank replenishment.

It was in this environment that the original HBC Local Plan proposed building approximately 1,300 new homes on Hayling Island, primarily as large housing dormitories for people working on the mainland – Hayling Island has little industry or employment to speak of. Of these large allocated sites, two are core wading bird habitats, and one of these (for 190 homes) will require constant groundwater pumping during wet weather to prevent surface flooding from a rising water table level beneath the site from a rising – and flowing – water table level beneath the site. Four more of the sites are subject to “on site” flood risk. The Inspectors’ examination recorded outstanding issues with the Hayling Island housing allocation sites, the Transport Assessment and its Addendum, and risk of flooding. These deficiencies were significant elements in the Inspectors’ advice to HBC to withdraw the Local Plan and address the issues prior to re-presentation for consultation and examination.

We presented our position to the Inspectors during the examination, and we agree with the findings and recommendations made by the Inspectors.

Since that time (July 2021), HBC have severed their joint management agreement with East Hampshire District Council. This Agreement probably contributed to the problems identified by the Inspectorate, and we agree with the decision to sever the Agreement.

HBC are currently looking to continue with the housing plan without the involvement of the Inspectorate in the interim period before a new Local Plan is presented. We do not agree with this intent. The residents of Hayling Island are not NIMBY’s – housing development has always been supported on a sustainable level (this is currently running at approximately 100 per annum on brownfield sites.) The Island also has an expanding mobile/second home network of approximately 2,300 units.

We are now seeing an increasing number of development applications (outside the Local Plan allocations) based purely on the knowledge that the Local Plan has been withdrawn following the Inspectors’ recommendations.

These developers and their associates are now acting in exactly the manner you accused them of in your March 2022 speech to the Conservative Environment Network. Their vast wealth allows their army of lawyers & paid subcontractors to strong-arm the Statutory Authorities and HBC to bend to their will. These speculative applications on Hayling Island completely ignore the concerns of the Inspectors relating to the absence of a sustainable infrastructure. History tells us here that as a result of not having a 5-year land supply, development applications which are normally refused gain approval on appeal, regardless of the strength of argument against.

Therefore, recognising the Government advice to avoid unnecessary development on greenfield sites and areas of flood risk, which impact all of the sites on Hayling Island, we are exposed due to:

- The Island's infrastructure (roads and coastline) has not been proven to be sustainable, nor is it subject to any formally-adopted strategy.
- The housing plan is not sound, and has been questioned by the Inspectors on the basis of wildlife mitigation and exposure to flood risk.

We have sympathy with Havant Borough Council as the conflicting objectives including housing targets and environmental demands cannot be resolved.

In conclusion, we cannot see how HBC can resolve this dichotomy and continue as a viable entity to discharge their constitutional obligations to the electorate they serve.

We ask you to use your Office to facilitate an essential reappraisal of the Hayling Island housing targets to set a level which reflects the risks and constraints of the local environment in order to create a sustainable Community.

We are available to your team anytime for clarification or discussion.

Please acknowledge receipt of this correspondence.

Yours sincerely,

Dave Parham, Save Our Island

Robin Davison, Save Our Island

Anne Skennerton, Chair of Hayling Island Residents' Association

Rosie Law, Representative for South West Hayling and Land North of Sinah Lane

Mike Owens, Hayling Sewage Watch & concerned resident

Cc Alan Mak MP

HBC Councillor Alex Rennie, Leader of the Council

HBC Councillor Clare Satchwell, Cabinet Lead for Planning, Hayling Seafront Strategy and Coastal Management