

Good afternoon,

Please see the below consultation response from Coastal Partners.

Site Address: Beachlands, 5 Sea Front, Hayling Island

Proposed Development: Full planning application for the development of 4No commercial units (E Use) and 32No residential units (C3 Use) over 4 floors with associated open space, public realm enhancements, demolition of the existing Beachlands Amusement Arcade Buildings and dwelling and associated works.

Reference: APP/24/00968

Response:

Thank you for re-consulting Coastal Partners on the above application, we wish to **maintain our objection**.

The applicant has submitted an addendum to the Flood Risk Assessment, which partially addresses some of our previous comments and concerns, however many of these have still not been addressed.

The Addendum has uplifted the outdated UKCIP09 climate change allowances which were previously used; however, Coastal Partners refer to the re-consultation objection response provided by the Environment Agency on 6th May 2025, which sets out the errors in how these have been uplifted and the subsequent impacts on the calculated design flood level for 2125, finished floor levels (FFL) provided and assessment of lifetime access and egress. Therefore, the figures provided in the Addendum cannot be accurately used to assess flood risk to the site over the lifetime of the development.

In addition, the Addendum still refers to outdated East Solent modelling from 2018 and appears to have only uplifted the 2096-2125 epoch using the Higher Central climate change scenario, rather than for the lifetime of the development. We again refer to the re-consultation response provided by the EA on 6th May 2025 and concur with their comments in relation to the use of the Higher Central scenario and the need for the Upper End scenario to also be assessed, given that this is Major Development with a 'More Vulnerable' classification.

The Addendum advises that safe internal refuge in the event of extreme tidal flooding will now be available to commercial building users in the stairwells of the residential units, however, has still not demonstrated that safe access and egress will be available for vulnerable building users or for vehicles.

Furthermore, the Addendum states that the ground FFL for commercial use will be 5.50 mAOD, 250mm above the design flood level (however, the figure provided for this has been shown by the EA to be inaccurate). Current national guidance advises a 600mm freeboard is required and where this is not possible, resilience measures need to be provided to 600mm above design flood level. The Addendum includes a section on possible resilience measures which could be provided, however does not confirm which will be implemented or to which levels.

The Addendum also now includes a section on coastal erosion, however, this incorrectly relies upon the 'Hold the Line' policy recommended within the North Solent Shoreline Management Plan and the management policies recommended within the Hayling Island Coastal Management Strategy. Recommended management policies of 'Hold the Line' cannot be relied upon as they do not guarantee the availability of funding required to implement them or for the ongoing maintenance of defences, particularly over the lifetime of the development. Moreover, the Addendum states that "construction of additional defences at the back of the beach in response to sea level rise [...] based on the above, the proposed development will remain protected from coastal erosion throughout its lifetime". It should be noted that the proposed development is located seaward of these, therefore implementation of any defences at the back of the beach would not protect the proposed development.

The Addendum has also still not assessed possible scenarios where wave overtopping, breach or failure of defences, or a withdrawal of maintenance of any defences could occur during the development's lifetime.

A Flood Response Plan has now been provided in support of the application, Coastal Partners refer to Havant Borough Council Emergency Planning to assess the effectiveness of this.

Kind regards,

Amy Adams



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