

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2025/126434/02-L01
Your ref: APP/24/00968
Date: 01 May 2025

Dear Sir/Madam

**FRA ADDENDUM - FULL PLANNING APPLICATION FOR THE DEVELOPMENT OF
4 NO. COMMERCIAL UNITS (E USE) AND 32 NO. 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**

BEACHLANDS, 5 SEA FRONT, HAYLING ISLAND

Thank you for the consultation on the above application, please quote our reference on all correspondence.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- take the impacts of climate change into account
 - The correct climate change allowances have not been applied accurately and therefore underestimate the predicted 1 in 200 year tidal flood level for the lifetime of the development

Consequently the FRA does not adequately:

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
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www.gov.uk/environment-agency
Cont/d..

- consider how people will be kept safe from the identified flood and coastal erosion hazards
- consider how a range of flooding events (including extreme events) will affect people and property
- consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event
- identify flood risk mitigation measures (including raised finished floor levels, resistance and resilience measures or safe access and egress routes) that will address flood risk for the lifetime of the development

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Advice to Applicant/Local Planning Authority

Thankyou for providing the Flood Risk Assessment Addendum (report ref: 2400840-ACE-XX-XX-RP-C-0302 dated March 2025). Section 2.7 sets out the approach to updating the design flood level so that it accurately reflects the correct climate change allowances as set out at [Flood risk assessments: climate change allowances - GOV.UK](#). The Addendum has added a 131mm increment to the superseded UKCP09 allowances included within the East Solent Coastal Model to account for an additional 10 years, thereby extending the development lifetime from 90 to the required 100 years. Unfortunately this is not an appropriate way of accounting for the UKCP18 allowances as it does not accommodate for the full increases across all four time epochs when comparing UKCP09 to UKCP18. It therefore underestimates the design flood level. This underestimation is further compounded because the FRA has only assessing the higher central scenario – the upper end scenario should also be assessed for more vulnerable development and we would recommend that it is used to design the necessary flood mitigation measures. Without any modelled water level data for 2125, the appropriate climate change allowances should be added to the present day flood level prediction. The present day modelled water depths and levels provided by the Environment Agency are presented on p.15 of the Addendum.

We welcome the location of residential properties at first floor level and above, the finished floor level of 9.1m AOD being above any potential flood level. However, without an accurate assessment of flood characteristics (flood depth, velocity, duration, speed of onset and frequency) it is not possible to assess the potential risk to the ground floor units or to the access and egress routes to be used as evacuation pathways. This information is needed to enable an informed decision to be made about the suitability of the development in the context of flood risk and if the proposed mitigation measures are sufficient to make the development safe (and therefore comply with the NPPF).

Coastal Partners have raised the issue of coastal erosion as a potential threat to the development site over the lifetime of the development. Please be mindful of their advice in this respect, particularly in relation to the emerging Hayling Coastal Strategy and the likelihood of any future defences such as those referred to in 3.12 of the FRA being delivered in the context of funding availability. The Shoreline Management Plan recommendations are aspirational and do not include a robust affordability assessment.

New development is not eligible for Flood and Coastal Erosion Risk Management Grant in Aid funding and should itself provide any measures necessary to make it safe from flood and coastal erosion risk for its lifetime. We would therefore question the validity of 3.13.

Yours faithfully

Miss Suz Greenwood
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