

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 consulting with Coastal Partners on the above application. In the absence of an acceptable Flood Risk Assessment, we wish to place a **holding objection** on the proposed development on grounds of coastal flood and erosion risk.

The site lies within the Environment Agency's present day Flood Zones 2 and 3 and is therefore at risk from a 1:200 year / 0.5% annual probability extreme tidal flood event. The site will be increasingly vulnerable to the impacts of climate change.

Whilst the applicant has submitted a Flood Risk Assessment (FRA) in support of the application, prepared by Ardent Consulting Engineers and dated October 2024, the FRA insufficiently demonstrates that the development will be safe from tidal flood and erosion risk over the planned 100-year lifetime of the proposed development.

The FRA references the previous Havant Borough Council Local Plan (Allocations) 2014 and Strategic Flood Risk Assessment (Local Plan Sites) 2018, where the site previously featured as an allocation, and as such, states that the Sequential Test was completed at the time of the allocation process, therefore does not need to be undertaken again. Whilst Coastal Partners defer to Havant Borough Council Planning to undertake the Sequential Test, a previous test from over 7 years ago should not be relied upon here by the developer, notwithstanding the substantial changes that have been made to national planning policy, flood and erosion risk management policy and climate change allowances in this time.

The FRA notes that existing ground levels of the site vary between 4.0 mAOD and 5.05 mAOD. Residential development is to be located at the first-floor level and above, however finished floor levels have not been provided for any floor level. In addition, the FRA has not demonstrated how safe access and egress, including for occupants of the residential development, will be available for the site over its 100-year lifetime.

The FRA has provided a 1:200 year design tide level of 5.13 mAOD for 2115, based on the 2018 East Solent Model. However, the 2018 East Solent Model uses climate change allowances (UKCIP09) that have since been superseded by the UKCP18 allowances. Therefore, these levels will need to be uplifted. Furthermore, a design tide level should be provided to at least 2125 for a planned 100-year lifetime. It is also worth noting that outputs from the new National Flood Risk Assessment 'Risk of Flooding from Rivers and Sea' and 'Risk of Flooding from Surface Water' data are due to be published on 25th March 2025, with these updates also incorporating the latest (UKCP18) climate change allowances. These outputs are likely to impact the way flood and erosion risk are shown to impact the site over the next 100 years.

The FRA notes a defence level of 5.0 mAOD in this location, however, has not assessed the impacts of wave overtopping, breach or failure of defences and how these could impact the development over its lifetime. The site also lies within the boundary of the indicative erosion zones for the 0-20, 20-50

and 50-100 year epochs, however the FRA has not addressed this or demonstrated how the proposed development will be kept safe from erosion over its lifetime.

No details have been provided on any flood resistance and resilience measures to be incorporated into the development.

Overcoming our Objection:

The applicant should submit a revised FRA, taking account of the above, which demonstrates that the proposed development will be safe from tidal flood and erosion risk over the duration of its lifetime. Please note, production of a new FRA will not in itself result in the removal of an objection. If this cannot be achieved, we will need to maintain our objection.

Due to the present day and predicted future coastal flood and erosion risk at the site, its close proximity to the sea and the complex coastal processes operating in this area, the revised FRA will need to be robust and sufficiently detailed in order for us to be able to remove our objection.

Kind regards,

Amy Adams



Coastal
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