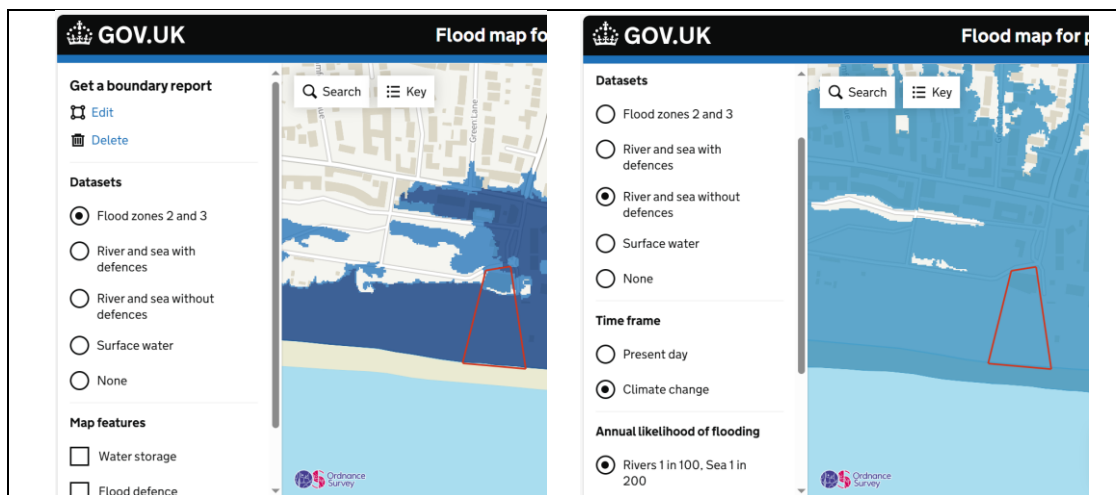


Comments from Planning Policy

Application No:	APP/24/00968
Address:	Beachlands, 5 Sea Front, Hayling Island
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
Case Officer:	LW
Comments by:	JB
Date of Comments:	2 April 2025
Policy Status The Local Plan (Core Strategy) and the Local Plan (Allocations), together with the Hampshire Minerals and Waste Plan form the development plan for the borough. All Local Plan and related documents are available at www.havant.gov.uk/localplan. Principle of Development The Local Plan (Core Strategy Policy CS6) supports regeneration on Hayling Island in principle. The site is further subject to a mixed use allocation on a wider piece of land comprising the funfair, amusement centre, tourist information office and car parks, under Policy HY2 in the adopted Local (Site Allocations) Plan. While this establishes the principle of development, it should also be noted that the policy expects a coordinated approach to be taken to the delivery of this wider mixed use site, which it does not appear the development of this parcel alone would achieve. 5 year housing land supply The Council is currently unable to demonstrate a 5 year Housing Land supply. There is therefore a presumption in favour of sustainable development, and the contribution this site could make to supply must be considered in the planning balance. <i>Five-year requirement with 20% buffer = 5,352 / 5 years = 1070.4 dwellings a year</i> <i>32 dwellings / 1070.4 = 0.029 years</i> The delivery of this site therefore has the potential to increase the Council's supply position by 0.03 years (rounded) to 1.83 years supply. Flood Risk There is significant flood risk on the site. The site lies in tidal Flood Zone 2 and 3 in the present day and the future scenario. (see extracts below from the nationally published flood map for planning)	



The starting point in national and local policy (Policy CS15) is that development in areas at flood risk should be avoided, and that where it cannot be avoided, various tests and assessments must demonstrate that development would be safe.

Sites in areas at risk of flooding are subject to a requirement for a sequential test, National guidance exempts allocated sites from this requirement, 'provided there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test' (Paragraph: 027, PPG).

The allocation policy in the adopted Local Plan notes that 'Part of site is in future Tidal Flood Zones 2 and 3'. A review of the SFRA that underpinned that Local Plan confirms that for Beachlands, it found that 'The site is located in current Flood Zone 1 but elements of the site could be in tidal Flood Zones 2 & 3 within the development lifetime'. Updated risk mapping from the EA as shown above clearly shows an increased risk compared to that earlier assessment. On this basis, it is considered that the applicant should undertake a sequential test to support the application. The applicant may wish to note that a new Strategic Flood Risk Assessment (Local Plan Sites ([evidence doc ref NE12](#))) has recently been published, which may aid them in this task.

[PPG 'Table 2: Flood risk vulnerability and flood zone 'incompatibility'](#) indicates that only 'less vulnerable' and 'water compatible' uses are fully compatible with FZ3. Since residential uses are classed as 'more vulnerable' the exception test must be passed, that is, if the sequential test is passed, it must still be demonstrated be shown that

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The latter part of the exception test should be satisfied through a site specific flood risk assessment (FRA). It is noted that an FRA has been submitted, but that the Environment Agency and the Council's Coastal Team have raised an objection on the basis that this is currently inadequate. This, together with part a) of the exception test, will need to be addressed before the development may be considered acceptable in terms of flood risk.

Summary

While an allocation in the adopted plan supports development in principle, flood risk forms a significant constraint on this site, and evidence on the risk to the site has changes significantly since the allocation is made. Flood risk is considered to be an overarching policy constraint on the development at this time, and it is suggested that development here should not be pursued. If the applicant wished to proceed with an application, a sequential test, exception test and satisfactory flood risk assessment to demonstrate the safety of the development will be required.

Other Detailed Considerations

Policy HY2 of the Allocations Plan includes a list of constraints, opportunities and site specific development requirements. In addition, the same considerations as for all development apply to this site, in line with the NPPF, the Local Plan and other related policy and guidance. These include considerations of design, amenity, provision of affordable housing, adequate parking provision and the like.