

Local Planning Authority: Havant Borough Council

Site Address: Land south of Saltmarsh Lane, Hayling Island, PO11 0JT

Proposed Development: Outline application for erection of up to 60 dwelling units with access; associated landscape and highway works on land south of Saltmarsh Lane, and all other matters reserved.

Reference: APP/21/01351

Response:

Thank you for re-consulting Coastal Partners on the above application.

Site Specific Flood Risk Assessment (FRA)

In 2022 Coastal Partners reviewed the applicant's initial Flood Risk Assessment and submitted a holding objection on the basis that the assessment was unsatisfactory. Changes were made to the FRA, and the holding objection maintained, until an Addendum to the FRA, dated March 2023, was found to be acceptable. The applicant has recently submitted a revised Flood Risk Assessment, dated July 2025.

Paragraph 1.1.4 of the applicant's July 2025 FRA states that the reason for submitting the new FRA is that 'there was a need to update to include the latest Surface Water flood mapping and the check the updated Havant SFRA.' In the process, the FRA has been altered to become unsatisfactory once again, appearing to revert to the information submitted in a previous FRA and not the updated addendum. In particular:

- There is a lack of consideration of appropriate climate change allowances. Section 8 of the FRA seeks to consider flood levels including during a climate change scenario. However, the levels presented at paragraph 8.1.2 are taken from the data provided by the Environment Agency (as per Appendix H) of the FRA, without also taking into account the advice from the EA provided with that data that 'The climate change data included in the models may not include the latest Flood risk assessments: climate change allowances'. Where the new allowances are not available you will need to consider this data and factor in the new allowances to demonstrate the development will be safe from flooding. The Environment Agency will incorporate the new allowances into future modelling studies. For now, it's your responsibility to demonstrate that new developments will be safe in flood risk terms for their lifetime'. This omission is then replicated

at Appendix J, where flood contours are presented, and into the possible mitigation solutions discussed in section 9 of the FRA.

- At Paragraph 9.3.2 a design life of 50 years has been assumed. A lifetime of 100 years should be assumed for residential development, unless there is specific justification for considering a different period. None has been given here.
- The revised FRA sets out a hierarchical approach to future flooding, with 3 proposed options of how flood risk will be mitigated over the development's lifetime, listed in order of preference. It does not confirm which solutions are actually proposed. This was the approach taken in an earlier version of the Applicant's FRA. We set out why this was not acceptable in our comments of December 2022.

We reinstate our **holding objection** to the proposal on the basis that the FRA does not adequately demonstrate that the development will be safe for its lifetime.

Flood Risk to Hayling Island

In July 2025 the Environment Agency approved Coastal Partner's Hayling Island Coastal Management Strategy, following approval by Havant Borough Council. This strategy reviews in detail the flood and erosion risk to the whole of the island's coastline, the condition of the existing defences and the changes that are expected as a result of climate change. Preferred options for addressing changing risks have been identified for each 'Option Development Unit' (ODU), or section of the island's coastline.

ODU16 covers the area from Langstone Bridge Carpark to Langstone Bridge and includes the northern part of the A3023 access road onto the island. The Strategy identifies that without defences in place the flood cell could merge with adjacent flood cells to the east and west during larger return period events. In this scenario, safe access and egress on to and off the island would be severely compromised.

The strategic intent for this area is to protect and maintain the viability of the A3023 into the future, as critical road infrastructure on the island, with the preferred option being to construct new defences which keep pace with sea level rise. A study to investigate this further is identified in the short-term action plan for 2029. However, the Hayling Island

Coastal Management Strategy also clearly highlights that the implementation of this option is dependent on funding availability, which is not guaranteed. At the present time, no funding has been identified to progress any defence works to protect the A3023 south of the bridge (NB a scheme has been developed and is fully funded to protect properties and the A3023 north of the bridge and is currently subject to a planning application).

We advise that the LPA should formally consider the emergency planning and rescue implications of new development in making their decision in light of the issues highlighted by the Hayling Island Coastal Management Strategy.

End Note

Coastal Partners makes comments only in relation to tidal flooding, and it is for the LPA to consider all other forms of flood risk as required by the NPPF and PPG. Equally, it is for the LPA to satisfy themselves that any NPPF / PPG / local policy requirements for passing the sequential and exception tests have been met for all forms of flooding, including tidal risk.



Nicola Reid BSc (Hons) PGDip TP