

Planning Application Response of Planning Policy

Application No:	APP/21/01350
Address:	Land North of Oysters, Station Road, Hayling Island
Development:	Outline application for erection of up to 29 dwelling units and associated highway works with all other matters reserved.
Case Officer:	AM
Comments by:	JB
Date of Comments:	16 September 2025

Development Plan

The [Local Plan \(Core Strategy\)](#) and the [Local Plan \(Allocations\)](#), together with the Hampshire Minerals and Waste Plan provide the development plan for the Borough.

Emerging Development Plan and updated Evidence Base

The [Draft Building a Better Future Plan](#) was subject to consultation in the Summer of 2025, supported by a number of [evidence base studies](#) which have updated the position on development requirements, land supply and constraints. Of particular relevance to this application are

- The 5-year housing land supply update
- The development strategy in the Building a Better Future Plan
- The Sustainability Appraisal of the Building a Better Future Plan
- The Council's Strategic Flood Risk Assessment (SFRA)
- The Council's Local Plan Sites SFRA.

The relevance of these documents to this applicant is discussed further in the relevant sections in the remainder of this note.

Principle of development

As the applicant acknowledges, the site lies outside the urban area as defined by policies CS17 and AL2 of the Development Plan. These policies seek to restrict development in these locations, except in exceptional circumstances. It is not considered that any of the exceptions for housing would apply here.

Five Year Housing Land Supply

The Council's [Five Year Housing Land Supply Update \(December 2024\)](#) indicates the Council has 1.8 years supply with a 20% buffer applied. This is notably below the five year supply threshold. The proposed scheme is not in the five year supply in whole or part. A permission would result in a gain of 29 units or 0.03 years towards the five-year housing supply requirement, as shown below.

Five year requirement with 20% buffer = 5,352 dwellings

Divided by 5 years = 1070.4 dwellings a year

29 dwellings / 1070.4 dwellings = 0.027 years

Paragraph 11 of the National Planning Policy Framework (NPPF) explains that planning applications should be granted in these circumstances, unless

- policies in the NPPF that protect areas or assets of particular importance provide a strong reason for refusing the development proposed; or
- any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits of doing so.

Noting this, even in the context of the 5-year supply position, a number of matters will have to be carefully addressed to support a departure from the development plan. Key points are discussed below, focussing on the areas defined in footnote 7 to paragraph 11 of the NPPF as assets of particular importance.

Tidal Flood Risk

On-site risk

The site lies in present day Flood Zone 1 (low risk). However, the National Flood Map for Planning indicates that in the future, with climate change taken into account, the site will be at risk. Although the Environment Agency publish the National Flood Map, they have indicated to the Council that [the PfSH 2024 Strategic Flood Risk Assessment \(SFRA\)](#) provides the most accurate picture of future risk. The SFRA indicates no increase in future tidal risk on the site.

On this basis it has been agreed with the applicant that the sequential and exception tests are not required.

A Flood Risk Assessment is required and has been provided. It is noted that Coastal Partners have found the FRA to be acceptable in showing how flood risk on the site will be mitigated.

Off-site risk

Both the Council's [Strategic Flood Risk Assessment \(SFRA\)](#) and the National Flood Map for Planning show that the single access road to Hayling Island, the A3023, is at risk of flooding, with significant increases expected in extent, depth and hazard in the future (see Part 4 – Havant Report, paragraphs 3.2.20- 3.2.24, and Appendix B maps). The SFRA (Part 4 – Havant Report, paragraph 6.11.8) recommends that this information should be taken into account in considering the suitability of further development on Hayling Island, with respect to tidal flood risk. It suggests that Havant Borough needs to be satisfied that proposals can be regarded as safe in the event that vehicular access to the mainland is not achievable.

While a Flood and Coastal Erosion Risk Management Strategy for Hayling Island has been developed by the Council's Coastal Partners and has been approved by the Environment Agency, it must be noted that funding for the schemes within it, which may mitigate the risk discussed above, has yet to be identified.

Paragraphs 163 and 164 of the NPPF are clear that the need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts. New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change, and when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

Under these circumstances, the strategy for the emerging Local Plan is to make no development allocations on Hayling Island. While that plan and the strategy within it hold limited weight in the determination of planning applications at this time and therefore should not be relied upon in the determination of this application, it is considered that the evidence and the recommendations within the evidence base, including the SFRA, are a material consideration. There is no information within the applicant's submission, nor evidence that the Council holds, which indicates that the risks identified by the SFRA have been considered or mitigated, and it is considered unlikely that this scheme in isolation could address those risks.

Brent Geese and Waders

The site is identified as a secondary support area through the Solent Brent Geese and Waders Strategy, making Policy DM23 of the Local Plan and Paragraphs 193 - 195 of the NPPF key considerations with regard to impacts on protected species. It is noted that the applicant has prepared a strategy to address this.

It is noted that the applicant has submitted an Ecological Impact Assessment (Tyler Grange, July 2025) and Habitats Regulations Assessment (Tyler Grange, July 2025), which the Council's ecologist has reviewed and provided comments on. So long as Natural England and the Council's ecologist are satisfied with the process undertaken and the mitigation solutions proposed, no policy objection arises and it may be considered that, in relation to this issue, no strong reason for refusing the application would arise in the context of Paragraph 11 of the NPPF relating to this issue.

Concluding comments

The Council's substantial shortfall in 5-year housing land supply is not disputed and is a significant consideration. Notably, however, the caveats in paragraph 11d i) and ii) of the NPPF must be carefully weighed up in the planning balance, together with all other relevant material considerations.

Footnote 7 of the NPPF specifically identifies categories of development which benefit from the caveat at 11di; 'areas at risk of flooding and coastal change' are one such category. Flood risk therefore represents a special consideration when applying the 'presumption in favour of sustainable development'.

In relation to flood risk it is considered that the proposal runs contrary to relevant NPPF policies in relation to areas at risk of flooding and coastal change, in particular because the proposal does not take account of the need to mitigate and adapt to the effects of climate change and does not avoid increased vulnerability to the range of impacts arising from climate change [in this case climate change related flood risk to Hayling Island]. (NPPF 163/164).