

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

Our ref: HA/2025/127200/01-L01
Your ref: APP/25/00781
Date: 17 November 2025

Dear Planning Officer,

CHANGE OF USE FROM COMMERCIAL FAIR SITE TO RESIDENTIAL SITE FOR 55 FLATS IN 5NO. 4 STOREY BLOCKS WITH ASSOCIATED PARKING AND LANDSCAPING.

1 SEA FRONT, HAYLING ISLAND, PO11 0AG.

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our and comments below.

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 (*Ref: Flood Risk Assessment & Drainage Statement FINAL*) dated September 2025) 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:

- 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
- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for 1 in 200-year tidal flood event for the lifetime of the development (100 years for residential). Consequently, the

development proposes inadequate:

- Raised finished floor levels
- Safe access and egress routes

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 the applicant and Local Planning Authority (LPA)

Raised finished floor levels

We are objecting to this application due to the proposed ground finished floor levels. The applicant has chosen the minimum freeboard allowance of 300 millimetres (mm) above the future design flood level, without providing satisfactory justification for this.

In section 6.7 of the FRA, the applicant proposed flood resistance and resilience measures to a minimum level of 7.17 metres above ordnance datum (mAOD). It is not our remit to approve such measures, but for the LPA to approve in writing.

In sections 6.8 to 6.12 of the FRA, the applicant has highlighted that the site benefits from an embankment and the Shoreline Management Plan (SMP) policy for the area is 'Hold the Line for the next 100 years'. The applicant states here, that '*the proposed development will remain protected from coastal erosion throughout its lifetime*'. The SMP is aspirational, and the Strategy is unfunded beyond the current South Hayling Basin Management Plan (BMP) cycle (2024-2029) so there is no guarantee that the strategic intent in the Hayling Island Coastal Management Strategy will be delivered. Therefore, the applicant cannot rely on the flood protection benefits associated with this site.

In sections 6.13 to 6.15, the applicant has proposed secondary flood protection to the embankment by implementing a wall around the perimeter of the new development. This may not be sufficient to reduce flood risk to the proposed residential units, as vehicular access will remain open where flood waters can inundate the site. There is also no information regarding the maintenance and testing of the flood wall for the lifetime of the development (100 years for residential).

Furthermore, the applicant has not included and assessed flood risk according to the most up to date 1 in 200-year tidal hazard flood mapping for the site. The flood mapping included in the FRA (Figure 6.1 and 6.2) are only up to the years 2065 and 2115. This has been superseded by the updated Partnership for South Hampshire (PfSH) Strategic Flood Risk Assessment (SFRA) up to 2122 (data available at [PfSH Strategic Flood Risk Assessment \(2024\) | Havant Borough Council](#)).

Due to the update to the PfSH SFRA, the tidal hazard flood mapping indicates that the tidal flood extent is larger, which means that the proposed access and egress route is not viable under these projections. The applicant should also consider flood depths and hazard frequency.

Lastly, the southern coastline of Hayling Island is affected by bimodal waves which can be very damaging to the coastline. There is residual uncertainty which will therefore need to be managed appropriately. Therefore, we request that the applicant identifies the appropriate freeboard allowance using the following guidance, inclusive of climate change and accounting for residual uncertainty - [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/accounting-for-residual-uncertainty-an-update-to-the-fluvial-freeboard-guide). In their amended FRA, they should demonstrate and provide justification to support the proposed freeboard allowance.

Advice to LPA

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Safe access and egress routes

Flood resistance and resilience

The applicant has proposed a list of measures for this site to a minimum level of 7.17m AOD. We strongly recommend the use of flood resistance and resilience measures. Physical barriers raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood warning and emergency response

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

[Planning practice guidance](#) (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a

[design flood](#) and to evacuate before an extreme flood needs to be considered.

One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development. In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

Safe access and egress routes

Furthermore, the applicant has not included and assessed flood risk according to the most up to date 1 in 200-year tidal hazard flood mapping for the site. The flood mapping included in the FRA (Figure 6.1 and 6.2) are only up to the years 2065 and 2115. This has been superseded by the updated PfSH SFRA up to 2122 (data available at [PfSH Strategic Flood Risk Assessment \(2024\) | Havant Borough Council](#)).

Due to the update to the PfSH SFRA, the tidal hazard flood mapping indicates that the tidal flood extent is larger, which means that the proposed access and egress route is not viable under these projections. The applicant should also consider flood depths and hazard frequency.

Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

We are aware that your LPA may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk we would like to highlight that in this case, as set out in NPPF footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal. If your LPA is not subject to the 'presumption in favour of sustainable development' you can disregard this paragraph. If our objection on flood risk is subsequently withdrawn, you can also disregard this paragraph.

We will always support and substantiate our objections to major development proposals at appeal wherever a refusal is lodged in line with our advice. If you are minded to grant

permission against our advice, please contact us before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Victoria Hindmarsh
Planning Advisor

Direct dial 02080260503

Direct e-mail Victoria.Hindmarsh@environment-agency.gov.uk