

Comments from Planning Policy

Application No:	APP/25/00781
Address:	1 Sea Front, Hayling Island
Development:	Change of use from commercial fair site to residential site for 55 flats in 5No. 4 storey blocks with associated parking and landscaping
Case Officer:	LW
Comments by:	JB
Date of Comments:	19/11/2025

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 (although it is noted that the applicant is aware of and has taken into account the recent proposals on the adjacent Beachlands sites). The policy also requires that proposals should enhance the tourism offer of Hayling Island, while this particular proposal would result in the loss of a tourist attraction on the seafront.

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.

*Five-year requirement with 20% buffer = 5,352 / 5 years = 1070.4 dwellings a year
55 dwellings / 1070.4 = 0.051 years*

The delivery of this site therefore has the potential to increase the Council's supply position by 0.05 years (rounded) to 1.85 years supply.

Flood Risk

There is significant tidal flood risk on the site. Much of the sites lies in present day Flood Zone 3 (high risk of flooding), with additional areas in Flood Zone 2 (medium risk of flooding). With climate change taken into account, the while site will be in Flood Zone 3 in the future, according to both the National Flood map for Planning and the Council's Strategic Flood Risk Assessment.

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. However, Paragraph 180 of the NPPF states that *'Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.'*

The information on flood risk at the sites has substantially changed since the allocation was made in 2014, in particular on the basis of [Updated climate change allowances](#). While it is accepted that the sequential test need not be undertaken, before the development may be considered acceptable in terms of flood risk, the applicant must therefore demonstrate that 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, in order to pass the exception test.

It is noted that a site specific FRA has been submitted, and that the Environment Agency currently object on the basis on an inadequate FRA. The shortcomings of the FRA will need to be addressed before the development may be considered acceptable in terms of flood risk.

Risk of Coastal Erosion

At the southern end of the site lies a defined Coastal Change Management Area (Policy AL4). While this adopted designation may not overlap with the proposal site, it should be noted that the 2025 Regulation 18 emerging Local Plan includes revised CCMAAs, based on more recent evidence of erosion risk. These affect the site, and much as the adopted policy AL4, the policy stance here would be that permanent new residential development, including through changes of use, should not be permitted. While it is acknowledged that the emerging policies hold little weight at this time, it is suggested that the evidence which has informed them is a material consideration and that on the basis of erosion risk to the site, this proposal is not considered acceptable. It is suggested that the views of Coastal Partners should be sought on this matter.

Summary

While an allocation in the adopted plan supports development in principle, evidence on the flood and the erosion risk to the site has changed significantly since the allocation was made, and now forms a significant constraint to development of this site, in particular for a vulnerable use such as residential.

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.