

Save Our Island wish to record a strong objection to APP/25/00781 for change of use from commercial fair site to residential site for 55 flats in 5No. 4 storey blocks with associated parking and landscaping.

The major justification in the application is based on the fact that this site was allocated for housing in the 2014 HBC Local Plan. This Plan was rejected by the Inspectorate in 2022 in part because there was no consideration of coastal flood risks or a mitigation plan included. A new Local Plan was required to be submitted, and that is currently in progress. The flood risk mapping in place for the 2014 Local Plan was based on EA data at the time. In 2025, the EA revised their flood risk map, and the new map clearly shows a much higher level of risk to the whole of Hayling Island with approximately 50% of the area now in Zone 3, with an additional large area at risk of inundation resulting from climate change from 2070. (See PIC 1)



Picture 1

As a consequence, HBC has determined with the new Local Plan that no new housing will be allocated on Hayling Island because the single A3023 bridge/road access route is within the Cat 3 flood zone which also covers most of the Island. The area of the Beachlands' proposal is contained in the 3, 2, & Climate Change zones. (See PIC 1)

The Planning Statement for this development says this development:

“ will make a valuable contribution towards meeting HBCs housing need. “

However, there is no longer a sustainable case for additional housing on Hayling Island. In fact, as a result of the 2025 EA flood risk mapping, HBC have determined that new permanent housing on Hayling Island is no longer considered economically viable in any way, and will further increase the number of families placed at risk with increasing inundation of the land mass as a result of climate change.

The applicant has engaged Ardent Consulting Group to provide a report named Flood Risk Assessment & Drainage Statement FINAL (FRA), which can be found under FILES in the application. This report is referred to numerous times in the following sections.

The applicants' statement that no further flood risk (sequential) assessment is required for this application (see 3.1 FRA) cannot be justified in light of the EA reappraisal of the risk to the health and welfare of the Island community. Relying on an allocation made 10 years before the EA 2025 reappraisal of flood risk is unsupportable. The revised 2024 NPPF (see Ref 180 below) clearly recommends a new sequential test where significant new flood risks arise – as is the case here.

180. 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.

Therefore, a new flood risk analysis should be mandated by the HBC Planning authority.

The Coastal Partners' Shoreline Management Plan categorises the Hayling Island beachfront as “hold the line” but that is recognised as aspirational and subject to funding being available. This funding is not guaranteed and has proven to be hard to justify based on the EA cost/benefit algorithms.

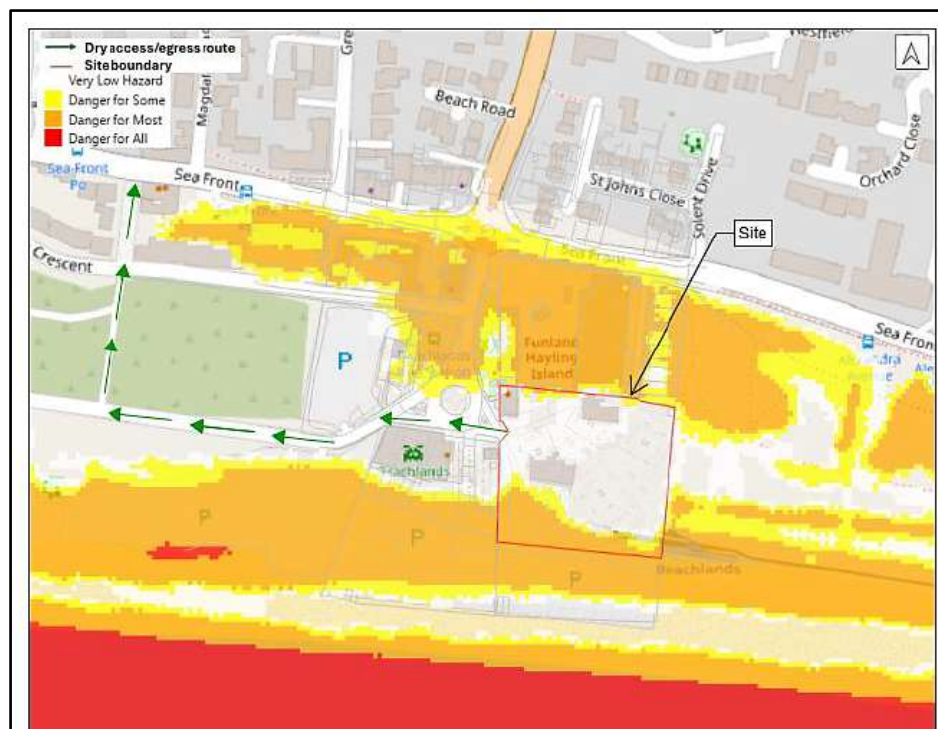
https://issuu.com/coastalpartners/docs/draft_strategy_summary_13.09.22

The rock groynes noted (see 6.10 FRA) are intended to control the natural east to west migration of the shingle beach. Rock groynes will not prevent the annual – and dangerous – overtopping, which is the reason for sea flooding along all of the 4km south beachfront. There is no factual evidence to support the consultant's opinion that the development will be protected from coastal erosion throughout its lifetime.

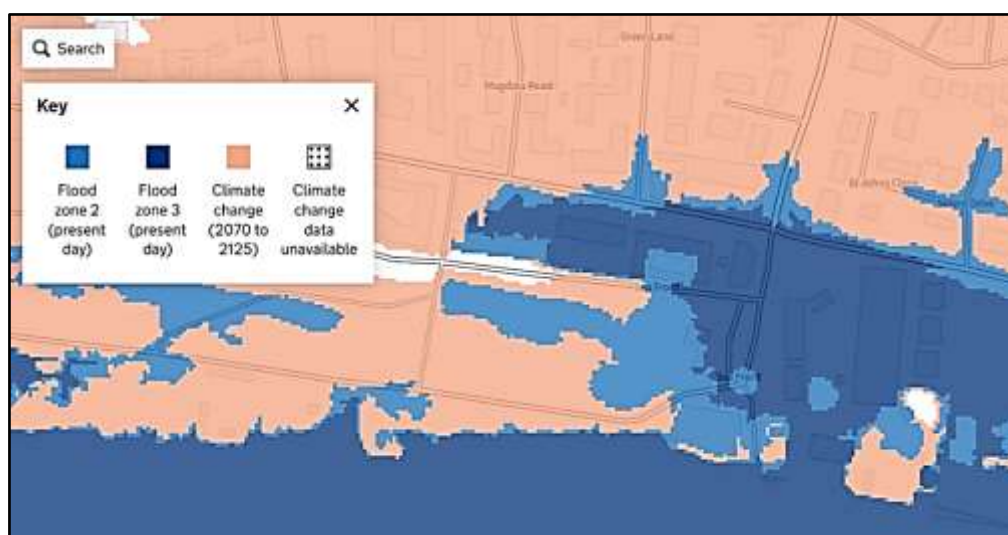
This development is on the south beach of Hayling Island. The latest EA flood risk maps for planning show that the whole coastline – and 50% of the land mass – are in Cat 3 flood zones. This area also includes the single-access A3023 route via Langstone Bridge and a large portion of the Island road network. During flooding events, access to the Island by road transport, emergency services, primary care services and parental & guardian access to schools will all be curtailed.

The FRA does accept that the area will flood from sea incursion, but the presentation used (see PIC 2) covers up to 2065 only. This represents a point in time 30 years following construction – not the 100-year period that the NPPF requires a development to be safe and sustainable for (as presented in the EA Planning Climate Change Map. (See PIC 3.)

Picture 2 also specifies a “dry” route to the development for emergency vehicles, but it does not cover the NPPF-required lifetime period. Also, the “dry” route identified in the 2065 presentation as indicated by the green arrows in picture 2, from 2070 will be in the Climate Change and Cat 3 flood zones indicated in picture 3. And the last 100m of that emergency route to Sea Front is not a road. It is a shingle pathway providing foot access to the beach. It is marked PRIVATE and has a gated barrier to restrict vehicle access. (See PIC 4)



Picture 2



Picture 3



Picture 4 Looking north to emergency route access to Sea Front

- In any event, the use of this “dry” emergency route for emergency vehicles will not be available during periods of sea inundation as the automatic flood barriers guarding the walls of the development will be closed, thus preventing access and egress. These automatic barriers will require UPS power protection together with regular maintenance and testing.
- The automatic flood barriers proposed will prevent residents’ access to and from the site for the duration of the flood event, and will necessitate careful planning by the residents for schooling, work, hospital and GP appointments etc.
- The assurance that this “dry” access route will provide a safe emergency exit does not exist on the EA Climate Change Flood Risk Map for the area (PIC 3) and should not be presented as such for the development’s lifetime.
- The presence of the large development will restrict the natural drainage of sea incursion in the area and will direct the sea flows towards the existing properties which are in close proximity.
- The report places heavy reliance on Coastal Partner’s Coastal Strategy. But it must be recognised that the “hold the line” categorisation for this beachfront is aspirational and is subject to available funding via the DEFRA/Flood and Coastal Erosion Risk Management process. The shoreline is unprotected shingle and is under constant movement and realignment. There is no plan to provide permanent hard seawall protection. This beachfront is overtopped annually – and has been for decades – and there is no expectation this will stop. It is more likely that overtopping will become more regular and severe over time as the sea level rises. (See PICS 5,6,7)
- There is NO GUARANTEE that this site will be protected from coastal erosion throughout its lifetime as stated in the FRA report.



Picture 5

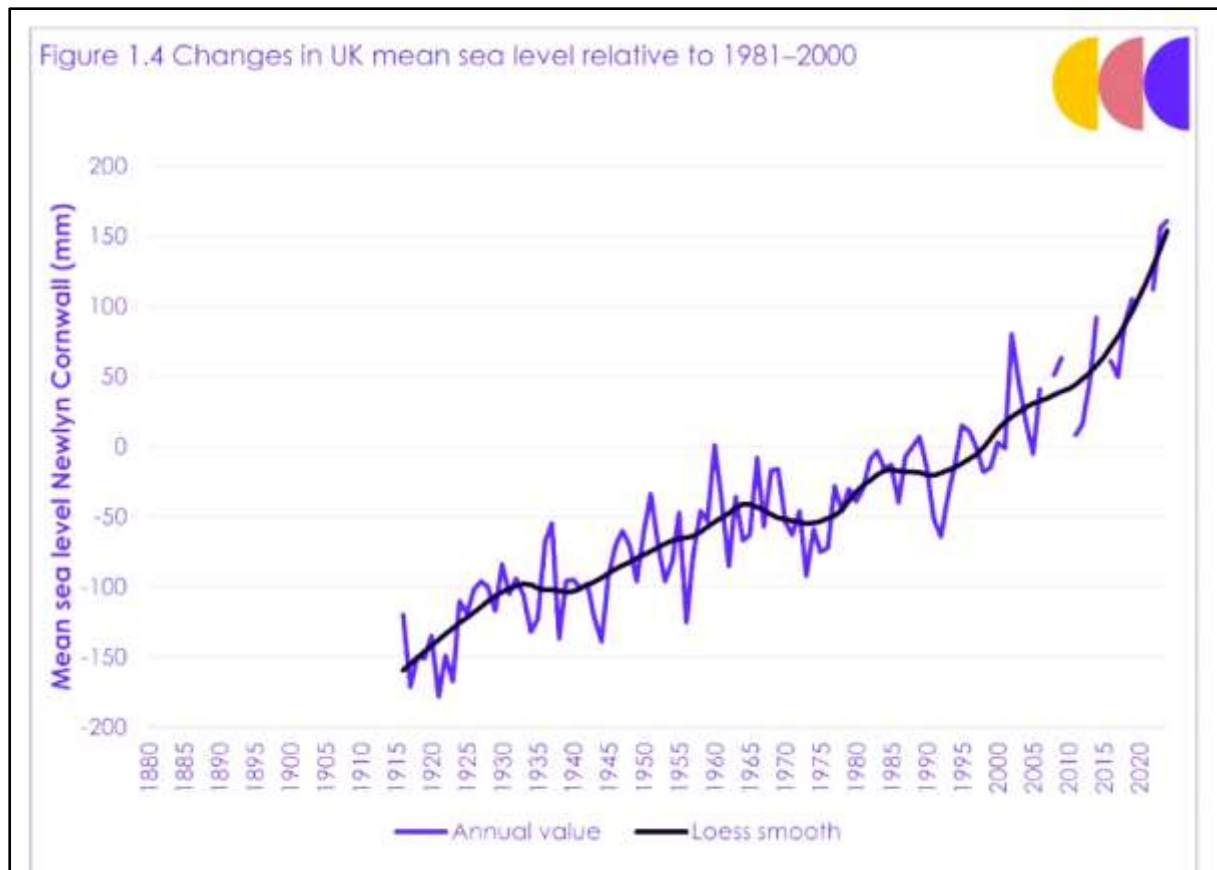


Picture 6



Picture 7

- We know from the independent Climate Change Committee has forecast that the average sea level rise from 2000 to 2025 is 0.5cm and the current rate is close to 1cm per year and increasing. This rate of change is expected to gain speed into the future. (See PIC 8) <https://www.theccc.org.uk/>



Picture 8

- Further, there is a major influence of the sea in Hayling Bay – the bimodal wave form. Hayling Island, like Chesil Beach, experiences a rare and dangerous wave attack. This wave form occurs when a major storm in the Atlantic forces powerful swell waves from the west forwards along the English Channel, striking the Isle of Wight and bending at right angles towards Hayling Island beach, always hitting the shore from the south. This phenomenon is recognised by Coastal Partners, and the impact can be huge. It has been known to destroy metres of the shingle beach protection barriers and to reprofile the whole beachfront in 24-48 hours. This bimodal wave form generates fast-moving, high-energy waves which can reach heights over two additional metres over the prevailing sea condition. This serious, dangerous and regular wave event is not referenced nor recognised in the FRA. (See PIC 9)



Picture 9 A bimodal wave

- Realtime climatic conditions affecting Hayling Island's shoreline are available live on the online automatic weather station CHIMET (<https://www.chimet.co.uk>) and these have been archived since 2009. The detail recorded on the database includes all of the variable impacts on the Hayling Island coast:

Wind speed and direction
Sea & wave height and periodicity
Air pressure

It is surprising, given the availability of this factual evidence base, that it has not been referenced or referred to in the Ardent report.

In summary, there is no identifiable need for this development; and it will in fact increase the number of residents who are at greatest risk of flooding by the sea. Building 55 new flats on an exposed, unprotected and regularly overtopped shingle beach, where winds can reach 100 mph, is not justified and must be refused.

Save Our Island
18 November 2025