

Local planning Authority: Havant Borough Council

Reference: APP/25/00781

Site Address: 1 Sea Front, Hayling Island, PO11 0AG

Proposal: Change of use from commercial fair site to residential site for 55 flats in 5No. 4 storey blocks with associated parking and landscaping

Coastal Partners Comments

Thank you for consulting Coastal Partners on the above application.

Much of the site lies in the Environment Agency's Flood Zone 3 and is therefore considered to be at high risk (1 in 200 year / 0.5% annual probability) of experiencing an extreme tidal flood event, with additional areas lying in Flood Zone 2 (medium risk). Once climate change is taken into account, the whole site is considered to be at risk.

Site specific FRA

The applicant has submitted a site specific Flood Risk Assessment in support of their application. We note that the Environment Agency has commented in detail on the FRA and has raised an objection, flagging a number of points which need further attention before the FRA can be considered acceptable. We concur with the suggestions made, and would add some further points:

We have not been able to find full details of the **proposed flood wall**. There are references within the body of FRA (Paragraph 6.13) to Appendix A of the FRA, but Appendix A appears to show only a basic site plan, without any details of the wall. In addition, the application documents seem to include only a 'product data sheet' for a self closing barrier, again with no site specific details. Any updated FRA and/or the submitted plans should include further details, so that the appropriateness of this measure may be fully considered, both by the LPA in terms of the design implications, and by the EA and Coastal Partners in terms of the effectiveness of the measure for flood risk management. In particular, it is unclear, based on the currently available information, how any wall or barrier may provide effective protection, when the western opening is to remain open during a flood event.

The additional information should also include a management plan setting out the details of the operation, monitoring and maintenance of the wall and barrier for the lifetime of the development. In terms of the operation at the times of flood, the barrier being self-closing does not obviate the need to consider the eventuality of failure of this mechanism and the need for human intervention. In terms of longer term monitoring and maintenance, it is not clear whether the applicant has considered such matters as the

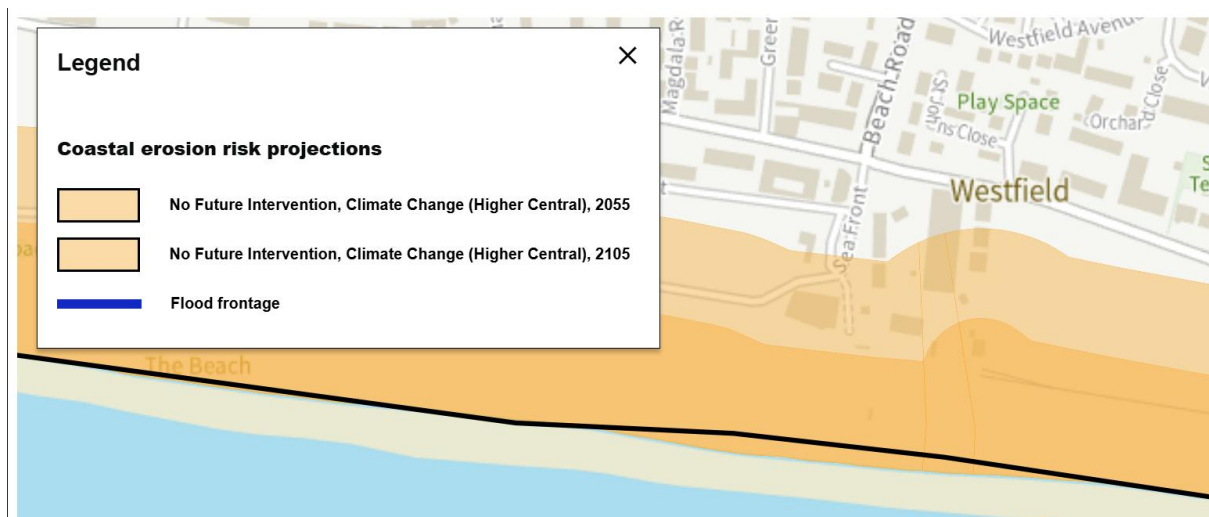
- the arrangements for and cost of regular ongoing inspections and maintenance and, if required, the cost of the replacement of the defence for the lifetime of the development,
- the potential sediment impact on the Beach Management Plan,
- future assessment of what other works may be required.

For the avoidance of doubt, the liability for the defences and the cost of their ongoing management and maintenance would lie with the developer or subsequent landowner or management company, not the Local Authority.

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The FRA includes a section entitled 'Coastal Erosion', from paragraphs 6.8 to 6.12. This does not consider in detail **erosion risk** at the site, rather it simply sets out the preferred options in the Hayling Island Coastal Management Strategy and the Shoreline Management Plan Policy before concluding that 'the proposed development will remain protected from coastal erosion throughout its lifetime'. There is at present no guarantee that the policy intentions set out will be delivered. The applicant's FRA should therefore consider fully both flood and erosion risk in the absence of these measures. In any case, even if strategic schemes were to be implemented, residual risk would remain, which should be considered through the FRA.

National erosion mapping, available at [Check the long-term erosion projections for an area in England | Shoreline Management Plans](#), shows that the proposal site is at risk of erosion in the medium to long term, see screenshot below:



In this context the LPA should note paragraph 184 of the NPPF, which states that inappropriate development in areas vulnerable to coastal change should be avoided. Coastal Partners are of the view that permanent residential development is inappropriate on this site, given the vulnerability to coastal erosion. This view is

supported by guidance in the PPG (paragraphs 072 and 073) for when Coastal Change Management Areas (CCMAs) should be defined, and what type of development is appropriate in such areas: *'Where there is uncertainty about securing funding for the implementation of hold or advance the line policies, local planning authorities can still identify areas that could be affected by coastal change to ensure prospective developers are made aware of the potential risks and inappropriate development is avoided'* (NPPG para 072) and *'Permanent new residential development (including through change of use) will not be appropriate within a Coastal Change Management Area'* (NPPG para 073). In making these comments Coastal Partners note that there is not currently a defined CCMA affecting the proposal site, other than in the emerging Local Plan (the current CCMA in the adopted plan, based on older modelling, sits to the south of the application site). Nevertheless, since there is evidence of the medium and long term erosion risk at the site, as shown above, Coastal Partners strongly suggest that the LPA should take this into account when determining whether residential development at the site is appropriate.

Overall, in light of the shortcomings of the FRA, which fails to adequately consider both flood risk and erosion risk or demonstrate that the site will be safe for its lifetime, Coastal Partners raise a **holding objection** to the proposal. We will be happy to provide updated comments if the applicant provides an updated FRA, although we would also advise at this stage that we consider the matters raised above to be significant, which it may not be possible or economically viable to address at a site level.

Flood Risk to the single access 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 (ODU1 and ODU15) 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 on risk in relation to tidal flood and coastal erosion risk, 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 for tidal risk.



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