

Consultation Comments from Planning Policy

Application No:	26/00089/FUL
Address:	26 Wittering Road, Eastoke, Hayling Island
Development:	Erection of a detached, three-bedroom, self-build dwelling with associated access, parking, hard and soft landscaping, and associated works, with an ancillary one-bedroom carers annexe following subdivision of the plot and demolition of the existing buildings
Case Officer:	TP
Comments by:	JB
Date of Comments:	23 March 2026

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.

These documents are available at www.havant.gov.uk/localplan.

Principle of Development

The site lies within the urban area as defined by policies AL2 and CS17, so the principle of development is accepted in this location.

5-year housing land supply

It is also acknowledged that the Council cannot currently demonstrate a five year housing land supply, which further supports a resumption in favour of sustainable development (para 11d of the NPPF).

However, it does not follow that planning permission should automatically be granted for development which would boost housing supply. Rather, permission should only be refused where the adverse impacts of permitting the scheme would significantly and demonstrably outweigh the benefits.

Weight must be given to the fact that the proposal would contribute to the Council's housing supply, but given that it is just a single dwelling, its contribution is minimal. Other matters would still need to be weighed in the balance, in particular flood risk, which is listed in footnote 7 of the NPPF as a particular constraint in the context of the presumption, and is discussed further below.

Flood Risk

This site lies on the east facing coast at Eastoke on Hayling Island. While much of the Eastoke Peninsula is at risk of tidal flooding according to the Environment Agency's Flood Map for Planning, the proposal site itself lies in Flood Zone 1 in the present day. However, once climate change is taken into account, the site itself is likely to move into the extent of Flood Zone 3, according to the Council's Strategic Flood Risk Assessment.

The applicant has provided a site-specific Flood Risk Assessment. The views of the Environment Agency and/or Coastal Partners should be sought on the acceptability of its conclusions.

The FRA includes a section on the sequential test and the exception test. With regard to the sequential test the applicant claims that this is not required as the FRA demonstrates 'the proposed development would be at low risk of flooding from all sources for its lifetime'. Planning Policy Officers do not consider this to be a correct interpretation of paragraph 175 of the NPPF, which is quoted in this context, as that paragraph does not refer to the level of risk, and rather

refers to 'no built development within the site boundary...would be located on an area that would be at risk of flooding from any source, now and in the future'. That patently does not apply here, since the proposed dwelling is clearly located in an area considered to be at risk in the future, which the applicant's FRA acknowledges.

Exemptions based on safety considerations, as set out in paragraph 027 of the PPG, relate to surface water risk only.

Planning Policy officers therefore remain of the view, as expressed in pre-application advice, that the sequential test is required in support of this application. This should demonstrate that there are no reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The search for alternative sites may be limited to Hayling Island, rather than the whole borough, the Council considering that a split of the borough into five distinct areas is appropriate in light of paragraph 027a of the PPG.

If the sequential test is passed, the exception test will also be required to be passed. While it is acknowledged that the site lies in Flood Zone 1 in the present day, it is considered to lie in Flood Zone 3 in the future, so the exception test applies in line with Table 2 of the NPPF. The applicant should therefore demonstrate that

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) 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.

Landscape and Ecology

Looking beyond the principle of the proposal and the matter of flood risk, its visual impact and effects on the sensitive Harbour environment will be a particular considerations with the following policies needing to be satisfied if the proposal proceeds to application:

- **Development in the Coastal Zone** – development is only considered acceptable in the coastal zone if landscape, access, recreational and ecological impacts are avoided or addressed in line with DM9
- **Chichester Harbour AONB** - National Policy and Local Plan Policy CS12 require the protection of the qualities of the AONB. The site is located on the edge of the AONB, within its setting, and therefore the visual impact of the proposal should be carefully considered. The Chichester AONB SPD may assist in this regard.
- **Design** – Policy CS16 expects high quality design in all development, and this will be particularly pertinent here given the above policies
- **Chichester and Langstone Harbours SPA, Ramsar and SSSI designations and Solent Maritime SAC** - The site lies immediately adjacent to these protected areas.

The Council's ecologist and landscape officer, as well as Natural England and the Chichester Harbour Conservancy may wish to comment on the proposal.

Summary

While development within the urban area is accepted in principle, and the Council cannot demonstrate a 5 year housing land supply, proposals must still meet the other requirements of national and local policy. In this case, the tidal flood risk to the proposed property will be a key consideration.