DTM PLANNING

# Flood Risk Exception Test – Part (a): Wider Sustainability Benefits

## Land at The Bus, Avenue Road, Hayling Island, PO11 0LX

Permission in Principle for residential development of up to four dwellings
Prepared on behalf of Mayfair Hayling Island Limited

## November 2026

### 1. Introduction

1.1 This statement addresses Part (a) of the Exception Test only and has been prepared in support of an application for Permission in Principle for residential development of up to four dwellings on land at The Bus, Avenue Road, Hayling Island. It should be read alongside Aqua Callidus' Flood Risk Assessment and Drainage Strategy, reference 20005, Issue 1, dated 11 June 2020, and Donnager Civil Engineering's FRA Addendum: Future Flood Risk, reference L047-DON-TN-001.P01, dated 3 November 2026. The Addendum updates the original report's assessment of future flood risk and addresses Part (b); this statement provides the separate Part (a) sustainability assessment.

1.2 The assessment has been prepared having regard to the National Planning Policy Framework (NPPF), updated on 29 September 2026, particularly Chapter 18 policies F6 and F7; national Planning Practice Guidance (PPG); Havant Borough Council's *Flood Risk Sequential Test and Exception Test Guidance for Applicants and Planning Officers* (January 2026); and its *Sustainability Appraisal of the Regulation 19 Draft Local Plan* (July 2026).

1.3 Policy F6 provides the national policy basis for the Exception Test. Where applicable, it requires wider sustainability benefits to the community that outweigh flood risk, safety for the anticipated lifetime in accordance with F7, and no increase in flood risk elsewhere, with an overall reduction where possible. These are separate requirements: a favourable sustainability balance does not substitute for lifetime safety or acceptable effects elsewhere. This statement addresses the sustainability requirement, referred to as Part (a) in paragraph 4.2.1 of HBC's guidance; the original FRA and Addendum address the technical requirements, referred to locally as Part (b). HBC's terminology is retained for clarity, but the assessment is applied under current F6, supported by F7. The requirement assessed here is:

***a) The development must provide wider sustainability benefits to the community that outweigh the flood risk.***

1.4 Paragraph 4.2.2 of HBC's guidance advises reference to its Sustainability Appraisal Framework. Identifying benefits against that framework is the starting point, not the completed test. Section 4 therefore considers the original FRA and Addendum explicitly, identifies the nature and consequences of the assessed flood risk and the measures relied upon, and weighs the community benefits against that risk. The technical findings are used to inform the Part (a) judgment without duplicating the separate assessment under F6 and F7.

1.5 This statement evaluates the proposal against the eight sustainability objectives identified in Appendix A of the Council's July 2026 SA. It identifies the social, economic and environmental benefits of the proposal and their weight in the Part (a) balance, having regard to the particular characteristics of the application site.

## 2. Site Context and Nature of the Development

2.1 The application site comprises approximately 0.19 hectares of land on the southern side of Avenue Road, within the established built-up area of North Hayling.

2.2 Residential development surrounds the site to the south, east and west, with further residential properties situated on the opposite side of Avenue Road. The site is therefore not an isolated location or an extension of development into the open countryside, but an infill opportunity within an established residential neighbourhood.

2.3 The land has a history of use for the stationing of caravans for human habitation and is identified in the accompanying Planning Statement as previously developed land.

2.4 The site has subsequently become unmanaged and overgrown, with the Planning Statement identifying associated problems of anti-social behaviour and vermin. Residential redevelopment would bring the site into beneficial use, secure its long-term management and improve the appearance and environmental quality of the locality.

2.5 The proposal is modest in scale, comprising a maximum of four dwellings. It would make efficient use of a small site within an existing urban area without requiring the release of additional greenfield land.

2.6 The site is accessible to existing local services and public transport, including bus connections to Havant and its wider employment, retail and rail facilities.

## 3. Assessment Against the Sustainability Appraisal Framework

Objective 1: Natural Environment and Biodiversity

*To protect and enhance the natural environment and support biodiversity.*

3.1 The proposed development would make use of previously developed land within the urban area rather than require the development of an undeveloped greenfield site.

3.2 This is an important environmental consideration in a borough where the availability of unconstrained land is severely limited and where competing demands for housing, biodiversity protection and other land uses must be balanced.

3.3 The redevelopment would provide an opportunity to introduce appropriate landscaping, managed planting and ecological enhancements as part of a comprehensive residential scheme.

3.4 The accompanying Planning Statement acknowledges the need for appropriate ecological mitigation, including measures relating to protected habitats, nutrient neutrality, recreational disturbance and relevant species. These matters would be addressed through the subsequent technical details consent process and, where necessary, planning obligations.

3.5 Subject to securing appropriate ecological mitigation and biodiversity enhancements, the proposal offers the potential to improve the environmental management of an underused urban site while avoiding additional pressure for development on greenfield land.

**Assessment:** Use of previously developed land in the urban area and improved site management offer environmental benefits. On-site biodiversity enhancement remains an opportunity rather than a confirmed outcome at this 'in principle' stage.

Objective 2: Climate Change

> *To minimise the Borough's contribution to climate change and ensure resilience to the effects of climate change.*

3.6 The proposal would accommodate additional homes within an existing urban area rather than establishing residential development on urban edges or in isolated locations.

3.7 The site's proximity to existing services and public transport provides opportunities to reduce reliance on private motor vehicles compared with less accessible locations.

3.8 The development would also provide the opportunity to incorporate contemporary energy-efficiency standards, low-carbon technologies and water-efficiency measures.

3.9 The climate-change benefits relied upon under Part (a) arise from the proposal's urban location, opportunities to use public transport and scope for energy-efficient homes.

**Assessment:** The urban location and modern construction standards offer climate benefits.

Objective 3: Homes for All

> *To provide good-quality homes for all.*

3.10 Havant Borough's housing land supply is 1.3 years against the five-year requirement, as recorded in the Rook Farm appeal decision. This represents a substantial shortfall and underlines the importance of additional housing delivery.

3.11 Up to four additional homes would make a modest but meaningful contribution to the Borough's significant unmet housing needs. That contribution is a public benefit in its own right and forms part of the cumulative contribution made by small development sites.

3.12 Small residential sites are an important component of housing supply as they deliver quickly within the 5-year period, they supplement larger allocations where delivery is more complex and where there is a reliance on significant infrastructure provision or land assembly. This scale of development also offers diversity in a slow housing market.

3.13 The proposed development would also make efficient use of land already situated within the established urban area, consistent with the objective of meeting housing needs in sustainable locations while limiting unnecessary development of less sustainable and undeveloped land.

3.14 The scale of development would allow housing to be integrated within an existing residential community. Appropriate standards of internal accommodation, outdoor amenity space, privacy and accessibility would be addressed through technical details consent.

3.15 It is acknowledged that the application does not presently propose affordable housing. Its contribution to this SA objective therefore arises primarily from the provision of up to four additional homes.

**Assessment:** Positive sustainability benefit through the contribution of up to four additional homes in an area with a significant housing land supply shortfall.

Objective 4: Healthy and Safe Communities

*To promote healthy, inclusive and safe places.*

3.16 Redevelopment would provide an opportunity to improve the condition, appearance and management of land which the Planning Statement identifies as neglected and associated with anti-social behaviour and vermin.

3.17 The occupation of the site for permanent residential purposes would introduce activity, natural surveillance and ongoing maintenance, with consequential benefits for the appearance of the locality and the residential environment.

3.18 The proposed development would also form part of an established residential neighbourhood, with access to local facilities and opportunities for integration into the existing community.

3.19 The proposal would provide positive community benefits by improving the condition and management of the site and contributing to the established residential neighbourhood.

**Assessment:** Positive effects in respect of community safety, natural surveillance and local environmental quality.

## Objective 5: Economy and Employment

*To support and enhance the local economy now and into the future.*

3.20 The development would support employment for contractors, tradespeople and specialist services during construction, alongside demand for materials and supply-chain businesses. Lichfields' September 2024 report for the Home Builders Federation, The Economic Footprint of Home Building in England and Wales, estimates that annual delivery of around 240,000 homes supported nearly 834,000 jobs, including direct, indirect and induced employment. This equates to a national benchmark of approximately 3.5 jobs supported per home. Applying this national benchmark to four dwellings indicates that the development could support approximately 14 jobs, including direct, indirect and induced employment, during the construction phase.

3.21 The latest ONS Family spending in the UK release, covering April 2024 to March 2025 and published on 11 June 2026, reports average UK household expenditure of £676.60 per week. Applied to four occupied dwellings, this equates to approximately £140,700 a year (£676.60 × 52 weeks × 4 households = £140,732.80). This would support the local economy in Hayling Island and in the wider Borough.

3.22 These economic benefits would be modest, reflecting the scale of the development. They nevertheless form part of the proposal's wider sustainability benefits and carry positive weight when considered together.

**Assessment:** Positive economic effects through construction activity, local expenditure and productive reuse of land.

## Objective 6: Effective Transport and Communications

*To promote an efficient transport and communications network which supports the move to a low-carbon future.*

3.23 The site benefits from its location within an existing urban area and sustainable location, rather than unsustainable and isolated countryside locations.

3.24 The Planning Statement identifies accessibility to local services and bus connections along Havant Road, including services to Havant town centre, employment opportunities and railway station.

3.25 The development would therefore provide opportunities for residents to access facilities using modes of transport other than the private car.

3.26 The detailed design of access, parking, cycle storage and associated movement infrastructure would be addressed at technical details consent. However, the proposal will include Electric Vehicle charging for individual dwellings.

**Assessment:** Positive sustainability benefits associated with use of existing transport infrastructure and access to services.

Objective 7: Natural Resources

*To protect natural resources from unsustainable levels and patterns of use.*

3.27 The proposal would make more efficient use of previously developed land and would avoid the direct loss of undeveloped greenfield land.

3.28 The redevelopment would provide an opportunity to introduce modern water-efficiency measures and an appropriately designed sustainable drainage system.

3.29 Modern drainage infrastructure offers an opportunity to improve the management of water resources as part of the site's redevelopment.

3.30 Requirements relating to nutrient neutrality, water quality and the protection of internationally designated habitats would be addressed through the detailed proposals and appropriate mitigation arrangements.

**Assessment:** Reuse of the land offers resource benefits, alongside opportunities for more resource-efficient development.

Objective 8: Sense of Place – Landscape, Townscape and Heritage

*To protect and enhance the* landscape *and townscape character of the Borough and protect and enhance heritage assets.*

3.31 The proposal is particularly consistent with SA criterion 8c, which seeks to make the best use of land.

3.32 The application site comprises previously developed land situated within an urban area and is surrounded by existing residential development. Residential redevelopment would therefore be compatible in principle with the prevailing land-use character of the surrounding area.

3.33 The proposed amount of development, comprising up to four dwellings on approximately 0.19 hectares, represents a modest residential scheme capable of being considered within the existing settlement context.

3.34 The previous residential application was not refused on grounds of unacceptable harm to townscape character or neighbouring residential amenity.

3.35 The redevelopment of the unmanaged site would provide an opportunity to improve the appearance of the street scene, introduce a coherent residential frontage and establish appropriate landscaping and long-term management.

3.36 This would assist in addressing the current underuse and deteriorating condition of the land while reinforcing the established residential character of the locality.

3.37 The precise form, scale and appearance of the dwellings would be determined through technical details consent and would need to demonstrate an appropriate response to their surroundings.

**Assessment:** Positive effects through effective use of previously developed land, improvement of the street scene and integration of new housing within an established residential area.

## 4. Overall Sustainability Benefits and Planning Balance

4.1 The assessment demonstrates that the proposal has the potential to contribute positively to a number of the objectives identified in the Council's Sustainability Appraisal Framework.

4.2 The principal wider sustainability benefits are:

- Delivery of up to four additional dwellings in a Borough experiencing a substantial housing land supply shortfall.
- Efficient reuse of previously developed land within an urban area.
- Avoidance of the need to release more greenfield land in less sustainable locations for the same development.
- Regeneration of an unmanaged and deteriorating site.
- Opportunities to reduce anti-social behaviour and improve natural surveillance.
- Improvement of the appearance and environmental management of the locality.
- Potential for landscaping, biodiversity enhancement and modern drainage infrastructure.
- Use of existing services, public transport connections and community infrastructure.
- Positive economic effects through construction activity and subsequent household expenditure.

4.3 The principal weight is attached to up to four additional homes in the context of the reported severe housing shortfall, and the lasting regeneration and management of this neglected urban site. The housing contribution is small in absolute terms; its value lies in adding homes on a small site rather than resolving the Borough's shortfall. Efficient land use, townscape improvement, management and natural surveillance are related aspects of regeneration and are not counted as independent benefits of equal weight. Construction employment and household spending carry limited additional weight: the national benchmarks in paragraphs 3.20–3.21 are illustrative, not evidence of 14 permanent local jobs or £140,700 of net additional local spending. Biodiversity, low-carbon design and landscaping opportunities carry only limited prospective weight until secured. Compliance with drainage and safety requirements is not itself counted as an additional community benefit.

4.4 Aqua Callidus' original FRA records a site level of approximately 4.3 m AOD and present-day Flood Zone 1 (sections 7–9). Its assessment used a 2120 tidal level of 4.45 m AOD and proposed finished floors at 4.80 m AOD (section 10). Its drainage strategy provides approximately 60 cubic metres of attenuation and controlled discharge at 2 litres per second, accounting for the stated rainfall climate-change and urban-creep allowances (section 11). Donnager's Addendum updates the future tidal assessment: pages 4–7 consider the 2122 upper-end 0.5% annual-probability event and future Flood Zone 3a. Page 7 reports a coastal-boundary level of 4.67 m AOD and a locally derived harbour estimate of 4.60 m AOD. The retained 4.80 m AOD floors provide approximately 200 mm above the latter estimate, not the former. The balance therefore uses the updated evidence rather than the original report's conclusion that no Exception Test was required.

4.5 The main residual concern is not confined to water entering the homes. Page 8 of the Addendum reports future access-route depths of 0.1–0.5 m and moderate hazard in the assessed 2122 upper-end scenario, with lower-hazard ground about 40 m away. The duration of those conditions is not established. Additional occupation would expose new residents to that future access constraint and possible disruption, and this counts against the proposal. The distance to lower-hazard ground is not treated as proof that crossing floodwater would be safe. Raised floors address internal exposure, while warning and advance evacuation arrangements address a different consequence: access becoming hazardous. Donnager proposes arrangements responsive to occupant needs, changing hazards and defence provision, established before the identified risk arises. The approach relies on those arrangements being deliverable and secured; the small number of homes limits the scale of additional exposure but does not remove it.

4.6 Pages 3–6 of the Addendum identify the Hold the Line policy and planned ODU15 strategic protection for the A3023 and surrounding development. They also explain that the SFRA scenarios retain current defence levels and omit the planned improvements. This supports a better managed future-risk position than the mapping alone depicts, but funding and approvals remain necessary: the balance does not assume that the defences are already delivered or guaranteed. Donnager considers delayed delivery and defence failure within its residual-risk approach. The raised floors are assessed against the harbour-level estimate without assuming that future defences lower that benchmark. The original drainage strategy's management of runoff is relied upon through the Addendum, rather than recast as a benefit compensating for tidal exposure. Given the time horizon, modest floor-level margin against the upper-end harbour estimate and outstanding implementation of management measures, the risk is given appropriate adverse weight, not dismissed as remote or negligible.

4.7 Set against that risk, housing delivery and lasting site regeneration provide the strongest community benefits. They commence with development and occupation, whereas the assessed tidal exposure develops over the future climate-change horizon. This difference in timing supports the proposal, but does not justify disregarding risk to later residents. The location allows new homes within an existing residential area and secures management and environmental improvements without extending the settlement onto greenfield land. That is an efficient-land-use benefit, not proof that every alternative would require greenfield release. The economic and prospective environmental benefits provide secondary support only. The applicant considers that this combination outweighs the additional future exposure associated with up to four homes because the FRA evidence identifies a specific raised-floor, drainage and residual-risk response, rather than leaving the risk unaddressed. This is a planning judgment on the assessed risk, not an inference from the existence of benefits or from Donnager's Part (b) conclusion alone.

4.8 On that basis, the applicant concludes that the wider sustainability benefits outweigh the flood risk for the sustainability requirement of F6, corresponding to HBC's Part (a). This conclusion depends on acceptance of the original FRA as updated by the Addendum and on the measures essential to its risk-management approach being secured. If the Council does not accept the technical basis or deliverability of those measures, the balance must be reconsidered against the resulting risk; the benefits inventory cannot establish a pass independently. The separate lifetime-safety and off-site-risk requirements of F6, supported by F7, remain matters for the flood-risk evidence and determination, not requirements that can be overridden by this balance.

## 5. Conclusion – Part (a)

5.1 This statement assesses the wider sustainability benefits requirement of national policy F6, corresponding to Part (a) in HBC's January 2026 guidance. Section 3 identifies the benefits; section 4 weighs them against the original FRA and Donnager Addendum rather than treating their existence as sufficient to pass the test.

5.2 The main benefits are up to four additional homes in an area of severe housing undersupply and lasting regeneration and management of previously developed urban land. Related townscape and community improvements reinforce those benefits without being double-counted. Economic activity and prospective environmental enhancements provide more limited additional support.

5.3 The countervailing risk includes future tidal exposure and moderate hazard on the assessed access route, not merely potential internal flooding. The comparison takes account of the limited margin between proposed floors and the Addendum's upper-end harbour estimate, the unknown duration of mapped access conditions and the funding and delivery dependencies of strategic defences. It also considers the raised floors, drainage provision and proposed management of residual risk. No assumption is made that the four-dwelling scale renders those matters insignificant.

5.4 For the comparative reasons in paragraphs 4.3–4.8, the applicant's judgment is that the community benefits outweigh the assessed flood risk and satisfy the sustainability requirement of F6, corresponding to Part (a). That judgment is expressly based on the original FRA as updated by Donnager and the securing of the measures on which the residual-risk assessment depends. It is not an unconditional conclusion independent of the Council's assessment of that evidence.

5.5 Donnager separately concludes that the technical requirements described locally as Part (b) are satisfied. Their consideration under F6, including lifetime safety in accordance with F7 and no increase in flood risk elsewhere with reduction where possible, remains with the original FRA and Addendum. Satisfaction of the Exception Test overall requires acceptance of all applicable F6 requirements; the Part (a) judgment in this statement neither establishes technical compliance by itself nor compensates for a failure to demonstrate it.