

Please see the below consultee response from Coastal Partners.

Site Address: Northney Farm, St Peters Road, Hayling Island, PO11 0RX

Proposed Development: Partial Reinstatement and Repair of existing sea wall to a height of 1.4m and Creation of an inner bund with a maximum height of 2.25m to protect habitat for wintering bird populations.

Reference: APP/23/00507

Response:

Thank you for consulting us on the above application, I can confirm that Coastal Partners have no objection in principle on tidal flood risk or erosion grounds to the proposed development but are able to offer the following comments and advice. Coastal Partners provided pre-application advice (reference GEN/22/01138) to this proposed development in February 2023.

Flood Risk

The site is shown to lie within the Environment Agency's present-day Flood Zone 3 and is therefore considered to be at risk of experiencing a 1:200 year (0.5% annual probability) extreme tidal flood event.

For information, the present day 1:200 year extreme tidal flood level for Chichester Harbour is shown by the Partnership for South Hampshire's Strategic Flood Risk Assessment (PFSH SFRA) to be 3.4 mAOD, increasing to a predicted 4.5 mAOD by 2115, due to the effects of climate change. However, the PFSH SFRA is currently being updated to reflect current climate change guidance. The latest guidance for calculating climate change sea level allowances can be found here: www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#sea-level-allowances.

The applicant has submitted a Coastal Flood Risk Assessment, prepared by EnviroCentre and dated September 2022.

Flood risk guidance and modelling is frequently updated and an FRA that is older than 6 months should not be submitted unless accompanied by an addendum, even if it is to inform that the information within the FRA is still current. If the LPA determine an updated FRA or addendum is required Coastal Partners wish to be re-consulted.

The Coastal FRA states that:

"Minimum bund crest levels required for the inner habitat protection is 3.24 m AOD (metres Above Ordnance Datum) which is equivalent to the 1 in 200 year flood level".

As this level is lower than the present day 1:200 year level shown within the PFSH SFRA, we recommended in our pre-application advice that the FRA to be submitted in support of the full planning application would need to clearly show how the present day 1:200 year level has been determined, however, this does not appear to have been provided. The Coastal FRA also advises that existing ground levels vary between 1.9 mAOD and 2.8 mAOD, below both the present day and predicted 2125 1:200 year extreme tidal levels.

In addition, the Coastal FRA advises that the recommended minimum bund crest levels for the outer flood protection and inner habitat protection of 2.70 mAOD and 3.24 mAOD respectively, exclude any freeboard allowance to account for wave uncertainties or overtopping, but that these were not considered necessary given the low vulnerability of the proposed land use behind the bunds and relatively low exposure to wave action.

Coastal Partners would recommend that the Environment Agency are consulted on the suitability of the flood modelling used and the associated defence heights proposed.

Strategic Background

Overall, the proposals are in line with the North Solent Shoreline Management Plan policy of 'Hold the Line' (No Public Funding Available) in the short and medium-term. The SMP is a non-statutory policy document that sets out a framework for the future management of the coastline. It should inform, and be supported by, the statutory planning process. Notwithstanding the SMP policy of 'hold the line' is this overarching framework, a recent SSSI appeal decision at Colner Creek (where the impact on coastal squeeze from maintaining sea defences resulted in a refusal) highlights the importance of conserving the natural environment in the overall planning balance and decision-making.

The site also falls within Option Development Unit 3 of the [Draft Hayling Island Coastal Management Strategy](#). For information, the Draft Strategy recommends adapting to the tide in this location, by making space for nature and maintaining the viability of agricultural land by exploring a more sustainable defence alignment.

In addition, this site was shown on the Policies Map for the pre-submission Local Plan as a site safeguarded for Intertidal Habitat Compensation (IN1J). Whilst it is acknowledged that the Pre-Submission Local Plan has now been withdrawn and therefore carries no weight, we feel it is an important consideration given the likelihood of this being safeguarded in any emerging local plan and the fact that there is a very limited supply of suitable sites.

Informative - Coastal Ecology:

In our pre-application response sent in February 2023, we advised the applicant to seek advice from Natural England on the proposed development, using their Discretionary Advice Service (DAS). -

We noted in our pre-application response that the shadow HRA did not appear to have referenced the latest Natural England Condition review of Chichester Harbour Sites, which concluded that the condition of Chichester Harbour SSSI is currently 'Unfavourable Declining'. We also noted that the HRA hadn't identified Coastal Squeeze as a Likely Significant Effect of the proposed works, and we advised that as the proposal includes coastal defence maintenance and construction works, it was our opinion that this should be included and assessed.

The HRA submitted in support of this application is dated November 2022 and does not appear to have addressed either of the above. CP note that NE have been consulted on this current application and will defer to them on this matter but felt that, as HBC's advisors on coastal issues, it would be remis of us to not mention this in our consultee response.

Kind regards,

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