

Dear Mrs Pickup,

Site Address: Poundcroft Stables, Havant Road, Hayling Island

Proposed Development: Change of use from grazing land to campsite with 28 fully serviced pitches, including construction of two new shower/toilet blocks, office building and ancillary structures.

Reference: APP/19/00744

Response:

Thank you for your consultation on the above application, I can confirm that the Eastern Solent Coastal Partnership wish to place a **holding objection** on the application, on the grounds that insufficient information has been submitted to adequately demonstrate how flood risk at the site will be mitigated.

The site is shown to lie within the Environment Agency's Flood Zone 3 and is therefore considered to be at risk from 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 Langstone Harbour is 3.3 mAOD, increasing to a predicted 4.4 mAOD by the year 2115, due to the effects of climate change.

The Flood Risk Assessment (FRA) submitted by the applicant does not take into account the likely implications of climate change, in relation to the existing ground levels of the site and the predicted extreme tidal flood levels over the lifetime of the development.

Furthermore, the FRA fails to address the length of occupancy of the site, and therefore whether the development will be classed as "highly vulnerable" (caravans, mobile homes and park homes intended for permanent residential use) or "more vulnerable" (sites used for holiday or short-let caravans or camping, subject to a specific warning and evacuation plan), in accordance with Table 2 of the Flood Risk and Flood Zones tables of the PPG.

Whilst the applicant has also submitted a copy of the Flood Warning and Evacuation Procedure (FWEP), this does not address the fact that safe access and egress would not be possible during an extreme tidal flood event, due to access and egress along Havant Road being located within the present day Flood Zone 3. In addition, the FWEP does not consider the requirement for access by emergency services during an extreme tidal flood event.

Overcoming our Objection:

The applicant should submit an FRA covering the items highlighted above, demonstrating that the site will be safe for the lifetime of the development, will not increase flood risk elsewhere, and where possible will reduce flood risk overall.

If this cannot be achieved, we are likely to maintain our objection.

Kind regards,

Amy Stevens AMIEnvSc BSc(Hons)
Coastal Engineer
Eastern Solent Coastal Partnership