

Good afternoon,

Please see the below consultation response from Coastal Partners.

Site Address: Land south of Saltmarsh Lane, Hayling Island, PO11 0JT

Proposed Development: Outline application for erection of up to 60 dwelling units with access; associated landscape and highway works on land south of Saltmarsh Lane, and all other matters reserved.

Reference: APP/21/01351

Response:

Thank you for consulting with Coastal Partners on the above application, I can confirm that we wish to place a **holding objection** on the application, on the grounds that insufficient information has been provided with the application to adequately assess coastal flood and erosion risk over the lifetime of the proposed development.

The site is shown to lie within the Environment Agency's present day Flood Zone 1 for tidal flood risk, and currently considered to be at low risk (less than 1:1000 year / 0.1% annual probability) from experiencing an extreme tidal flood event. However, it should be noted that the site borders the present day Flood Zones 2/3. The site is shown by the Partnership for South Hampshire's Strategic Flood Risk Assessment (PfSH SFRA) to be affected by climate change, and from 2025 is increasingly located within Flood Zones 2 and 3 (1 in 200 year / 0.5% annual probability to 1 in 1000 year / 0.1% annual probability), including the access and egress route for the site along Saltmarsh Lane.

For information, the present day 1 in 200 year extreme tidal flood level for Langstone Harbour is shown by the PfSH SFRA to be 3.3 mAOD, increasing to a predicted 4.4 mAOD by the year 2115 (design tide level), due to the effects of climate change. However, the SFRA is currently being updated in line with the most recent climate change guidance as the current estimates are outdated. The latest guidance for calculating climate change sea level allowances can be found here:

www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.

The applicant has submitted a Flood Risk Assessment (FRA) compiled by Patrick Parsons and dated October 2021. The 'Executive Summary' of the FRA states that:

"The site is not at risk of any forms of flooding" and advises that as such, no flood resilience measures will be required.

However, the scale of the development and its location within Flood Zones 2 and 3 from 2025, including access and egress routes along Saltmarsh Lane, mean that the development will be



vulnerable to the impacts of tidal flooding. The FRA also highlights that both localised groundwater emergence and surface water flooding may be a risk at the site.

The FRA goes on to advise that, in an extreme tidal flood event, safe access and egress from the site would be available via the main access to the site. Whilst this is currently true, the PfSH SFRA shows that access and egress along Saltmarsh Lane is shown to be increasingly located within Flood Zone 3 from 2025, and therefore cannot be considered 'safe'. Occupants of the site will instead be reliant upon the provision of safe internal refuge, set above the design tide level.

In addition, the FRA also fails to consider whether safe access and egress would be available for emergency services during an extreme tidal flood event throughout the duration of the development's lifetime, nor does it consider any potential requirements for statutory flood compensation beyond the present day.

In particular, the FRA fails to acknowledge:

- The extreme tidal flood levels which could impact the site over the lifetime of the development, using the most recent (UKCP18) climate change guidance, in metres above ordnance datum (mAOD);
- The existing ground levels of the site;
- The proposed finished floor levels for all buildings, and evidence that these have been set with the extreme tidal flood levels in mind;
- Provision of a Flood Warning & Evacuation Plan or similar, applicable for the lifetime of the development, written in accordance with advice from the Environment Agency; and
- Incorporation of flood resistance or resilience measures, where appropriate.

Overcoming our Objection:

The applicant should submit a revised FRA, addressing the above points. If this is not possible, we are likely to maintain our objection.

Kind regards,

Amy Adams AMIEnvSc BSc(Hons)

Coastal Engineer | Coastal Partners

Havant Borough Council, Public Service Plaza, Havant, PO9 2AX