

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 up to 60 dwelling units with access; associated landscape and highway works, all other matters reserved

Reference: APP/21/01351

Response:

Thank you for your re-consultation on the above application, I can confirm Coastal Partners wish to **maintain our holding objection**, on the grounds that there is still insufficient information to adequately assess whether the development will be safe from coastal flood risk over the duration of its lifetime.

As stated in our previous response, the site is currently located within the Environment Agency's (EA) Flood Zone 1, however is predicted to be increasingly located within Flood Zones 2 & 3 from 2025, including access and egress for the site along Saltmarsh Lane, and will be increasingly at risk from a 1:200 year extreme tidal flood event with climate change.

The applicant has submitted a revised Flood Risk Assessment (FRA) compiled by Patrick Parsons and dated June 2022.

Despite our previous holding objection, the 'Executive Summary' of the revised FRA maintains that:

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

Since our previous response, a data request was submitted to the EA, who have provided updated still water levels for the 1:200 and 1:1000 year extreme tidal flood events, obtained from the 2018 East Solent Coastal model produced by JBA Consulting. However, the revised FRA only refers to levels for 2015, 2065 and 2115, when 2022 levels should be used as a baseline and levels for 2122 used for the design flood level, assuming a 100-year lifetime as set out by the NPPF. The 2018 East Solent Coastal Model also does not incorporate the latest UKCP18 climate change allowances, therefore the applicant would still need to provide updated levels incorporating these.

The revised FRA sets out a hierarchal approach to future flooding, with 3 proposed options of how flood risk will be mitigated over the development's lifetime, listed in order of preference.

The preferred option was deemed to be “flood defences by others”, with the revised FRA stating that:

“It is reasonable to assume that there would be planned flood defence works in the area to prevent this potential flood mechanism by the critical deadline of 2065 (noting that the existing houses may have an earlier critical deadline such as 2025).

It is anticipated that the EA or Coastal Partnership would implement some form of tidal defence in the next few years, which would in turn protect the development site from flooding.”

It should be noted that this proposed development site is located within policy unit 5AH107 (North Shore Road, New Town to West Lane, Stoke) of the overarching North Solent Shoreline Management Plan (NSSMP). This unit has a policy of ‘No Active Intervention’ for the next 100 years, with localised Hold the Line at Newtown, **therefore the applicant should not rely on any potential future scheme delivery.** Furthermore, even a policy of ‘Hold the Line’ does not guarantee securing the necessary funding, licenses & consents required to construct defences. Notwithstanding this, it is the responsibility of the developer to ensure that their development is safe from flood risk over its lifetime, not that of Havant Borough Council or the EA.

Option 2 proposed to raise external ground levels – however, multiple levels have been provided here and the FRA does not specify which of these will be used, with ground levels of 4.0 mAOD and minimum finished floor levels (FFLs) of 3.95 mAOD both being referenced. Furthermore, these levels are only based on the 2065 1:200 year extreme tidal flood level provided by the EA, rather than the 2075 (assuming 50-year lifetime) or 2122 (if 100-year lifetime) levels, and do not include a climate change freeboard. As stated above, these levels also still do not incorporate the latest UKCP18 climate change allowances.

Option 3 proposed future proofing and was deemed the least preferable option. In this scenario, FFLs would be set at 4.56 mAOD and other measures such as flood gates or doors would also be utilised. Whilst Coastal Partners would, in principle, have no objection to this approach (subject to being secured by means of planning condition to ensure these measures are in place prior to occupation of the site), the FRA goes on to advise that this option may not be practical due to its “significant impacts” on other factors such as the Drainage Strategy that would need to be checked further. We would always recommend that passive mitigation measures are used over active mitigation measures such as flood boards, as these rely on people installing them to work, rather than already being in place.

The revised FRA has provided updated information on possible evacuation routes and emergency plans, and we would encourage Havant Borough Council to determine the suitability of these.

Kind regards,



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