

Good afternoon,

Site Address: 2 Dolphin Quay, Dolphin Quay, Queen Street, Emsworth

Proposed Development: Development of a mobile catering unit to be erected on the hardstanding between Dolphin House and No. 2 Dolphin Quay.

Reference: APP/22/00232

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 to adequately assess tidal flood risk over the lifetime of the development.

The site is shown to currently lie within the Environment Agency's Flood Zone 3 for tidal flooding and is considered to be at risk from 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 the year 2115, 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the SFRA is currently being updated in line with the most recent climate change guidance as the current estimates are outdated.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) in support of the application, compiled by Hamill Davies Limited and dated March 2022. However, this relies heavily upon information from a previous FRA, compiled by Opus International Consultants in 2016, for a separate development at the site. The Opus FRA is now significantly outdated, following revision of the National Planning Policy Framework (NPPF) in 2018 and publication of the most recent UKCP18 climate change guidance.

As outlined in the Opus FRA, the existing ground levels of the site are approximately 3.0m, 0.4m below the present day 1:200 year extreme tidal flood level and 1.5m below the predicted 1:200 year extreme tidal flood level for 2115. The site is therefore at high risk of tidal flooding. Though the site benefits from privately-owned and maintained coastal defences, in the form of a sea wall and flood gates, there remains a residual flood risk to the site, in the event of overtopping or defence failure. Furthermore, the applicant has not provided details of the standard of protection provided by these defences, or how they are operated and maintained.

Overcoming our Objection:

The applicant should submit a revised FRA, appropriate to the scale and nature of the development, demonstrating that the development is safe and does not increase flood risk elsewhere, and where possible, reduces flood risk overall.

Within the FRA, we would expect the following information to be addressed:

- All sources of flood risk which may impact the site, over the duration of its lifetime;
- 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);



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- The existing ground levels of the site;
- The proposed finished floor levels, and evidence that these have been set with the extreme tidal flood levels in mind;
- Technical details of the privately-owned coastal defences on the site,
- How residual flood risk will be mitigated over the lifetime of the development, including the incorporation of flood resistance and resilience measures, where appropriate, and the preparation of a Flood Warning & Evacuation Plan, in accordance with advice from the Environment Agency.

If this cannot be achieved, Coastal Partners are likely to maintain this objection. Production of an FRA will not automatically result in the removal of an objection.

Coastal Partners concur with comments made by the Environment Agency in relation to the impacts of the proposed development on the culvert and maintenance/emergency access to the watercourse.

Kind regards,

Amy Adams AMIEnvSc BSc(Hons)

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