

Houghton, Michelle

From: Adams, Amy
Sent: 03 February 2022 16:48
To: Havant Planning and Development Mailbox New
Cc: Pickup, Tina; Reid, Nicola; Stainer, Emma
Subject: APP/21/01007 - Consultation Response

Good afternoon,

Please see the below consultation response from Coastal Partners.

Site Address: 16 and land to rear of 18 and 20 West Haye Road, Hayling Island

Proposed Development: Demolition of existing dwelling; erection of 4No. detached dwellings (1No. 3 bed house, 3No. 2 bed bungalows), with associated access and parking.

Reference: APP/21/01007

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 coastal flood risk over the expected lifetime of the proposed development.

According to the Partnership for South Hampshire's Strategic Flood Risk Assessment (PfSH SFRA), the site is shown to lie within the Environment Agency's present day Flood Zone 1 and is considered to be at low risk (less than 1:1000 year / 0.1% annual probability) of experiencing an extreme tidal flood event. However, it should be noted that an adjacent property lies partially within the present day Flood Zone 3 (1:200 year / 0.5% annual probability). From 2085, the majority of the proposed development site is predicted to lie within Flood Zone 3, in addition to much of the access and egress route for the site along West Haye Road.

For information, the present day 1:200 year extreme tidal flood level for Chichester Harbour is 3.4 mAOD, increasing to a predicted 4.5 mAOD by 2115 (design tide level), 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 not submitted a Flood Risk Assessment (FRA) in support of the application. Whilst the site is under 1ha, Footnote 55 of the NPPF requires an FRA for land identified in a strategic flood risk assessment as being at increased flood risk in future. As stated above, the development is shown to be predominantly within FZ3 in 2085. The development proposes an increase in dwellings at the site, with the dwellings being single-storey. If future safe access and egress is not available in the event of extreme tidal flooding, occupants will be reliant upon the provision of safe internal refuge, set above the design tide level. On this basis, we believe an FRA is required to allow adequate consideration of whether the development accords with para. 167 of the NPPF for its lifetime.

Overcoming our Objection:

The applicant should submit a Flood Risk Assessment (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:

- How flood risk at the site is predicted to increase with climate change and how this will be mitigated over the lifetime of the development;
- Existing ground levels of the site, in metres above ordnance datum (mAOD);
- Evidence that the finished floor levels have been set with the predicted 1:200 year extreme tidal flood levels for the site in mind; and



- 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.

Kind regards,

Amy Adams AMIEnvSc BSc(Hons)

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