

Local planning Authority: Havant Borough Council

Reference: APP/25/00937

Site Address: Brontes Cafe, Havant Road, Hayling Island, PO11 0LP

Proposal: Provision of Fixed Container of 9 metre length, to replace present mobile cafe unit; with external freestanding toilet.

Coastal Partners Comments

Thank you for consulting Coastal Partners on the above application.

The site lies in the Environment Agency's Flood Zone 3 and is therefore considered to be at high risk (1 in 200 year / 0.5% annual probability) of experiencing an extreme tidal flood event.

The applicant has provided a Flood Risk Statement. This comprises a single page and merely states that

It is proposed that the Cafe Unit would -

- a) be of non-permanent nature to allow ready relocation;*
- b) be raised so floor is approx 0.30m above general ground level;*
- c) have any electrical outlets a minimum of 0.6m above floor.*

It must therefore be concluded that the risk to the site from tidal flooding has not been considered. Coastal Partners suggest that a site-specific FRA should be completed for this proposal, in line with national guidance, which states that a site-specific Flood Risk Assessment (FRA) will be required for all proposals for new development located in Flood Zones 2 and 3. This should consider likely flood depths at the site, in metres above Ordnance Datum (mAOD) for the present and future climate change scenarios, calculated using [UKCIP18 climate change allowances](#). Further guidance is available at: [Flood risk assessments: applying for planning permission - GOV.UK](#)

For the avoidance of doubt, Coastal Partners note that

1. The proposed use is classed as 'less vulnerable' in Planning Guidance and that it is therefore not considered incompatible in principle with a location in flood zone 3. Coastal Partners acknowledge this and do not have an in principle objection to the proposed use in this location. However neither can the use automatically be considered appropriate without full consideration of the risks.
2. The applicant emphasises the 'non-permanent' nature of the proposal, and that this would allow 'ready relocation'. While this may be the case in terms of its medium or longer term future, the nature of the proposed structure does appear to be at least semi-permanent and would not be able to be removed from the site each time there is a flood warning. Making a full assessment of the tidal risk will not only help decision makers on this application, but will also allow the applicant to consider fully the likely implications of a flood event on the proposed unit. It will also allow full consideration of what resistance and resilience measures would be appropriate and effective.

Coastal Partners are also concerned that if flood depths are significant and the container and other structures are not effectively secured, that these could move in the event of a tidal flood event and damage flood defence or other infrastructure. The applicant should demonstrate through their FRA how this would be prevented.

Pending a full assessment of the flood risk as well as proposed management and mitigation measures through an FRA, Coastal Partners raise a **holding objection** to this proposal.

End Note:

Coastal Partners makes comments only on flood risk in relation to tidal flood risk, and it is for the LPA to consider all other forms of flood risk as required by the NPPF and PPG, taking advice from any relevant consultees. Equally, it is for the LPA to satisfy themselves that any NPPF / PPG / local policy requirements for passing the sequential and exception tests have been met for all forms of flooding, including for tidal risk.



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Coastal Partners