

Local planning Authority: Havant Borough Council

Reference: APP/26/00089

Site Address: 26 Wittering Road, Hayling Island, PO11 9SP

Proposal: Erection of a detached, three-bedroom, self-build dwelling with associated access, parking, hard and soft landscaping, and associated works, with an ancillary one-bedroom carers annexe following subdivision of the plot and demolition of the existing buildings

Coastal Partners Comments

Thank you for consulting Coastal Partners on the above application. We offer the following comments:

The site lies in the Environment Agency's Flood Zone 1 and is therefore considered to be at low risk (less than 1 in 1000 year / <0.1% annual probability of experiencing an extreme tidal flood event). However, in the future, with climate change taken into account, the site is expected to move into Flood Zone 3, and is therefore considered to become at high risk of flooding (1 in 200 year / 0.5% annual probability of experiencing an extreme tidal flood event) during the lifetime of the development.

All the sleeping accommodation in the proposed dwelling is located at ground floor level.

The applicant has provided a site specific Flood Risk Assessment. The assessment has concluded that, based on current EA modelling with climate change allowances applied, flood levels could reach 4.20m AOD. In response, finished flood levels are proposed at 4.50m AOD, 500mm above existing ground levels and 300mm above the expected flood level.

EA guidance recommends that finished floor levels should lie 600mm above the expected flood level. The applicant should seek to achieve this, or demonstrate why it cannot be achieved. If it is not possible to achieve, the new dwelling should be designed with suitable flood resistance and resilience techniques / methods to 600mm above the expected flood level - this element is currently absent from the applicant's FRA. Guidance on possible resistance and resilience measures can be found at

- [Flood risk assessment: Flood Zones 1, 2, 3 and 3b - GOV.UK](#), under the heading 'Extra flood resistance and resilience measures' and
- <https://www.gov.uk/government/publications/flood-resilientconstruction-of-new-buildings>

Coastal Partners would expect flood resistance measures to be implemented in all situations where internal flooding could occur. Resilience measures should not be utilised instead of resistance measures but alongside them.

It is noted that the FRA recommends that future occupants sign up to the EA's Flood Warning Service. Coastal Partners support this recommendation. However, the LPA, in arriving at their decision, should note that the applicant's FRA does not consider whether access or egress from the site would be possible at the time of a flood. Given that the area around the site lies in present day Flood Zone 3, it must be assumed that no dry or safe access or egress would be possible, and that occupants may need to evacuate before a flood event, or remain in their dwelling. The LPA must consider whether they are satisfied with this arrangement in terms of the overall acceptability of the development.

It is suggested that in its present form the FRA does not robustly demonstrate that the development will be safe for its lifetime and raise a **holding objection** to this proposal.

End Note:

Coastal Partners makes comments only in relation to tidal flood and erosion 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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