Site Address: Hayling Seaside Railway, Sea Front, Hayling Island, PO11 0AG
Proposed Development: Construction of a Heritage Centre, including facilities of a shop selling Railway and Heritage Memorabilia adjacent to the existing Eastoke Corner Station and depot. The new building to include provision for an accessible toilet and first floor mezzanine floor incorporating a small office and storage area accessible by stairs and a lift.
Reference: APP/26/00212
Thank you for consulting with Coastal Partners on the above application.
The site is currently located within 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. With climate change, the frequency and severity of flood events is expected to increase. National Coastal Erosion Risk Mapping also shows the site at risk of coastal erosion by 2055 with no further intervention.
Flood risk has been referred to in the Environment Agency's 'Household and minor extensions in Flood Zones 2 and 3' standing advice form. However, when the form asks for the 'Applicant to choose one or other of the flood mitigation measures below' in the table on the first page, neither has been selected. It is not clear why the applicant believes no mitigation is required or how this conclusion has been arrived at, since possible flood levels do not appear to have been considered.
Therefore the applicant has not provided a sufficient Flood Risk Assessment (FRA).
The applicant should submit a site-specific FRA, appropriate to the scale and nature of the proposed development, outlining how flood risk at the site will be mitigated. This was previously highlighted in our pre-application response to this site, application reference GEN/25/00568.
Within the FRA, Coastal Partners would expect to see the following:

- Assessment of all sources of flood risk shown to affect the site over its lifetime.
- Calculation of design flood levels (in mAOD) calculated using the latest climate change allowances.
- Confirmation of existing ground levels (in mAOD).
- Confirmation of ground finished floor levels and evidence that these have been set with climate change in mind (in mAOD).
- Details of any flood resistance or resilience measures to be incorporated, where practical to do so.

Coastal Partners note that 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. However, the use can not be considered appropriate without full consideration of the risks.
Overall, do not consider that in its current form the application has sufficiently assessed the tidal flood and erosion risk. Coastal Partners therefore 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.

Kind regards,

Coastal Partners**Emma Howarth**

Coastal Engineer
Coastal Partners, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX