**Chichester District Council**

**Strategic Flood Risk Assessment Revision**

**April 2021**

**Introduction**

This note sets out background information on the revisions to the 2018 Strategic Flood Risk Assessment (SFRA) and consequential changes to the Council’s Housing and Employment Land Availability Assessment (HELAA).

**Background**

In 2018 the Council commissioned a Level 1 Strategic Flood Risk Assessment from consultants JBA.

The Environment Agency (EA) and West Sussex County Council both contributed to preparation of the brief and, along with Southern Water, took part in the inception meeting and commented on draft reports, with a further meeting in November 2018 before the final report was signed off. The report draws upon a range of data to consider current flood risk and future flood risk due to the impacts of climate change, in accordance with the National Planning Policy Framework (NPPF).

The report was published on the Council’s website in support of the *Preferred Approach Plan* consultation in December 2018. None of the responses, from the EA or others, raised the issue of the climate change flood risk information[[1]](#endnote-1).

**Housing and Employment Land Availability Assessment (HELAA)**

The climate change flood risk information was used in the production of the 2020 Housing and Employment Land Availability Assessment (HELAA). The HELAA provides an initial high level assessment of the availability of sites for development and constitutes a background document used in the production of the emerging Local Plan. The published methodology document confirmed that climate change flood risk data from the 2018 SFRA was used to identify areas at risk of fluvial and tidal flooding up to the years 2070 and 2115 and that sites or parts of sites proposed for development which were affected by that future flood risk were discounted on that basis[[2]](#endnote-2).

It should be noted that the HELAA document (as is typical for such documents) states that it *only identifies available sites. It does not allocate sites for development. The allocation of sites for future housing or economic development will be determined through the Local Plan Review*. In addition, sites which are discounted in the HELAA still may be the subject of a planning application – which will be determined on its own merits.

**Revising the Strategic Flood Risk Assessment**

Following publication of the Strategic Flood Risk Assessment on the Council’s website in December 2018 the document has been available to the Council and other parties as part of the evidence base for the emerging Local Plan and to inform planning applications.

As part of the ongoing consideration of planning application reference 20/02491/OUT (Land west of Church Road, East Wittering) the issue of climate change flood risk arose. The site was identified in Appendix E of the published SFRA as falling within the climate change flood risk zone. However, discussions with the Environment Agency relating to that planning application indicated that it did not believe this site to be affected by that risk.

This difference was investigated with both the EA, and the Council’s SFRA consultants, JBA.  The reason for the difference was found to be which of the various flood risk scenarios were used in the SFRA 2018. In response, the Council’s consultants JBA prepared a document which combined the relevant data to prepare revised maps setting out the climate change flood risk and proposed to use this revised information as follows –

* The updated Appendix E will be uploaded to CDC’s website, and referred to as a revised version of the 2018 SFRA.
* The resulting shapefiles sent by JBA for 2070 and 2115 will be displayed on the council’s intranet GIS, to be used for viewing alongside other planning application and constraint data.
* The shapefiles will be used as a constraint within the planning application system to highlight those applications falling within them, that require consideration for future flood risk.

The Environment Agency confirmed on 9 February that “w*e are happy to confirm that we agree with the approach detailed as per your email dated 27th January 2021. We have checked the updated map with JBA and the SFRA outlines will align with the ones we use to inform our planning responses”*.

Following that, the Strategic Flood Risk Assessment was revised to include this revised information on climate change flood risk. The Revised information is contained in Appendix E to the document. Both the revised appendix and the superseded appendix remain on the Council’s website so it is clear what changes have been made, but in broad terms less of West and East Wittering and Bracklesham Parishes are affected, and (to a lesser extent) more of Selsey and Hunston.

Therefore, the revisions to the Strategic Flood Risk Assessment have not arisen because of any change in methodology in assessing flood risk, nor a different emphasis being placed on the importance of flood risk. The changes to the document have arisen purely because of a correction arising from the Environment Agency confirming that in their view flood risk due to climate change affects different areas to that previously set out in the 2018 SFRA.

It is also worth noting that the EA are continually updating their data and modelling as new evidence emerges. We have been advised by the EA that further updates could be available towards the end of 2021 but until these are published, it is not possible to predict the effect these will have on the flood zones. While we will always seek to use the latest information available in the production of the SFRA and to determine planning applications, it is important to recognise that there may be further changes in the future.

**Updating the Housing and Employment Land Availability Assessment**

As a result of the above, it was considered necessary to revise the Housing and Employment Land Availability Assessment. This ensures that the Local Plan evidence on the Council’s website is consistent with the revised Strategic Flood Risk Assessment information, as of February 2021.

Therefore in March the Council published a revised 2021 HELAA. This reflects all of the revisions in the SFRA. Whilst not a full update, it also contains a number of other amendments. All of the amendments in the 2021 HELAA are set out in Appendix 7 of the document[[3]](#endnote-3), but the changes due to the revised climate change risk are summarised below as follows –

**2021 HELAA Update – revisions due to revised climate change risk**

| Parish | Total change in number of dwellings on assessed sites |
| --- | --- |
| West Wittering | Land west of Church Road site no longer discounted due to climate change flood risk – so total theoretical capacity increased by 226 dwellings |
| East Wittering and Bracklesham | Three sites no longer discounted due to climate change flood risk – so total theoretical capacity increased by 517 dwellings |
| Earnley | More of Clappers Lane site now more affected by climate change flood risk. Total theoretical capacity of site reduced from 80 dwellings to 69 dwellings |
| Hunston | Part of parish now affected by climate change risk. So total theoretical capacity of sites reduced by 136 dwellings. |
| North Mundham | Climate change flood risk now affects part of one small site. Total theoretical capacity reduced by 5 dwellings. |
| Selsey | A number of sites discounted or theoretical capacity reduced due to climate change flood risk. Total theoretical capacity reduced by 198 dwellings. |

In some parishes, the total theoretical capacity of sites assessed as developable has increased – in others it has fallen. These changes in capacity reflect the differing impacts the revised climate change data has across the Chichester Plan area.

Again, these changes have not arisen because of any change in methodology in assessing flood risk, nor a different emphasis being placed on the importance of flood risk in the HELAA assessment. The changes summarised above have arisen purely because of the revisions to the 2018 SFRA. They did not arise because of any comments received from site promoters. Other changes to the HELAA are listed in Appendix 7 with reasons.

**Going Forward**

The issue of planning and flood risk will be taken forward in the following ways.

With regards to **planning applications**, applications will be considered in light of national and local planning policy and advice from the Environment Agency in terms of current and future flood risk. Local policy considerations include the document '*Towards Integrated Coastal Zone Management (ICZM) on the Manhood Peninsula'*, which was adopted by the Council in 2011. The adopted Local Plan notes this is *an aspirational plan that reflects the views and objectives of the communities on the Peninsula. The document has been subject to public consultation and therefore has some weight as a material planning consideration.*

With regards to the **Local Plan**, the Council is currently considering further the scale and distribution of development which can be delivered across the Plan area, given known infrastructure funding and delivery constraints[[4]](#endnote-4). That work is still ongoing. Ultimately the Local Plan will reflect the most recent information on flood risk and climate change, and consider the appropriate approach to development on the Manhood Peninsula.

Finally, with regards to **future flood risk assessment**, the Council is aware that in July 2020 the Environment Agency published revised guidance on climate change allowances in flood risk assessments[[5]](#endnote-5) and that further updated information may be available from the Environment Agency later this year. The Council is commissioning a full update to the 2018 Strategic Flood Risk Assessment to ensure that going forward it has the most up to date information to inform its decision making. Following revisions to the 2018 SFRA we have received a number of suggestions for the methodology of this update. These will be discussed with the Environment Agency and carefully considered whether it would be appropriate to include them in the update. That update is expected to be ready later this year and once it is complete it will be published on the Council’s website. Any necessary subsequent revision to the HELAA will be considered at that time.

Notes and references

1. The responses to the *Preferred Approach Plan* are available on the Council’s website at: <https://www.chichester.gov.uk/article/30923/Preferred-approach---consultation-December-2018> [↑](#endnote-ref-1)
2. The document is available on the Council’s website at <https://www.chichester.gov.uk/article/29759/Housing-and-economic-land-availability-assessment> [↑](#endnote-ref-2)
3. The HELAA document is available on the Council’s website at <https://www.chichester.gov.uk/article/29759/Housing-and-economic-land-availability-assessment> [↑](#endnote-ref-3)
4. Further information is set out in the report *Local Development Scheme,* considered by Cabinet and Council on 2 March 2021 andavailable on the Council’s website at <https://chichester.moderngov.co.uk/documents/s19398/Revised%20Local%20Development%20Scheme%202021-2024%20report.pdf> [↑](#endnote-ref-4)
5. Available on the Government’s website at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [↑](#endnote-ref-5)