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| Project                   | Southbourne, Chichester                                |
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## 1 Introduction

- 1.1.1 Pell Frischmann has been appointed by the Church Commissioners for England (“the Commissioners”) to provide Flood Risk and Drainage advice in relation to the Southbourne Allocation Development Plan Document, and particularly, the assessment of site options through the Regulation 19 process at Southbourne, West Sussex.
- 1.1.2 The Commissioners strategic landholding at Southbourne covers approximately 69.3 hectares (ha) of land to the west of Southbourne village (the ‘Site’). It is located within the administrative area of Chichester District Council (CDC), the Local Planning Authority (LPA). The Lead Local Flood Authority (LLFA) is West Sussex County Council (WSCC).
- 1.1.3 This note has been prepared to review the Flood Risk and Drainage evidence base insofar as it relates to the identification and comparative assessment of site allocations, with a particular focus on the land to the west of Southbourne (due to its location within the Commissioners ownership) and its relative performance.
- 1.1.4 The purpose of this review is to consider whether the conclusions reached within the evidence are appropriately justified and whether the approach adopted provides a robust basis for differentiating between sites. It also considers whether any material flood risk or drainage considerations arise which would support an alternative approach to site selection.
- 1.1.5 The key documents reviewed as part of this Note include:
- Southbourne Allocation Development Plan Document 2021- 2039, Assessment Framework, April 2026. (the Assessment Framework)
  - Southbourne Allocation Development Plan Document Regulation 19 Submission, June 2026 (the DPD)
  - Southbourne Allocation DPD SFRA Level 2, October 2025 (the SFRA)
  - Southbourne Allocation DPD Sequential Test, June 2026

## 2 Soundness and Policy Context

- 2.1.1 The NPPF is clear that plan-making should be underpinned by evidence, which is proportionate, transparent and capable of demonstrating that the most appropriate spatial strategy has been selected. This includes ensuring that flood risk and drainage considerations are taken into account including policy and legislative requirements, such as the application of the Sequential Test in accordance with NPPF.

## 3 Application of the Assessment Framework (Flood Risk and Drainage)

### 3.1 Development in Flood Zones

- 3.1.1 The Assessment Framework includes consideration of flood risk as part of the ‘Environment’ section. Relevant criterion is transposed from Chapter 5 of the Assessment Framework below.

| Assessment Criteria                             | Scenario 1 (West)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Scenario 2 (East)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Scenario 3 (Mixed)                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Development location within Flood Zones.</b> | <p>The main concern in terms of flooding is surface water flooding, primarily north of the railway and to the south of the railway line along the potential access road. This needs mitigation through design.</p> <p>Ultimately, the SFRA Level 2 concludes that the site overall is low risk.</p> <p>Given that the vehicular bridge is not considered likely to be required the site has not been marked down for this category. If it were to be required then the site would score poorly, as that would be a significant piece of infrastructure which would have to be provided in an area which is at risk of flooding.</p> | <p>The main concern in terms of flooding is surface water flooding, primarily north of the railway line. This needs mitigation through design.</p> <p>There is also an area of future tidal flood risk at the southern end of the site, however, the SFRA Level 2 shows that this would be extremely shallow, and hence this isn't considered to be a significant issue. That part of the site is not a necessary part of the allocation and is not proposed to be included in the allocation.</p> <p>Ultimately, the SFRA Level 2 concludes that the site overall is low risk.</p> | <p>The site area contains several areas which are susceptible to surface water flood risk. However, with such a huge area which could be developed these areas can largely be avoided.</p> <p>This option does not entail an all-modes bridge over the railway line, which reduces the risk of flooding impacts when compared with the other two options.</p> <p>Ultimately, the SFRA Level 2 concludes that the site overall is low risk.</p> |

- 3.1.2 The Council's Assessment Framework incorrectly assumes that the vehicular bridge over the railway is not required to provide access to the Site for Scenario 1 (West), and suggests that this scenario would be marked down on flood risk grounds if the bridge is in fact included within the assessment.
- 3.1.3 Whilst the route of access through an area shown to be susceptible to surface water flood risk on the northern side of the railway could be considered as a negative in comparison to the eastern site, the issue is not insurmountable, subject to the outcome of a site-specific Flood Risk Assessment (FRA) and suitable drainage strategy. The Assessment Framework acknowledges at paragraph 2.36 that the existing A259 may be at risk of surface water flooding, but the Level 2 SFRA does not consider this to be highly significant and so a similar conclusion could be drawn to the proposed vehicular bridge access.
- 3.1.4 The impact on surface water flood risk areas can be managed through appropriate compensation for any potential lost volume of floodplain storage, whilst the actual risk may be reduced through embedded mitigation via surface water management within the site that will lead to an overall reduced level of flood risk, and show no increase to flood risk elsewhere in line with the requirements of the NPPF.
- 3.1.5 It is our view that overall, flood risk for the western, eastern, and combined development scenarios is low in line with the conclusion of the technical evidence base (also see section 4 and 5 below) – thus reaching the same position as the Council. We would disagree that the location and inclusion of the proposed vehicular bridge

through Scenario 1 should be negatively weighted for this scenario as potential impacts can be managed through appropriate design and embedded mitigation.

## 4 SFRA Level 2

- 4.1.1 The Level 2 Strategic Flood Risk Assessment (SFRA) provides a detailed appraisal of flood risk associated with the three Southborne allocation options, considering fluvial, tidal, surface water, groundwater and reservoir flooding, together with the effects of climate change.
- 4.1.2 The assessment concludes that both sites lie predominantly within Flood Zone 1 and are at low risk from river and coastal flooding, with the principal constraints relating to localised surface water ponding and manageable groundwater conditions.
- 4.1.3 The report identifies a recommendation and guidance for proposed development options. These include, but are not limited to:
- Implementation of sustainable drainage systems (SuDS) to manage proposed development runoff and manage existing surface water flood risk
  - Schemes to manage groundwater flooding,
  - Site-specific Flood Risk Assessments and the sequential layout of development,
- 4.1.4 Furthermore, the Level 2 SFRA also states that “...where [surface water] flow routes are altered due to changes in ground levels on the site, it is important that the site-specific FRA includes an assessment of the impact on and off site, with suitable mitigation provided” (Section 4.3: Guidance for proposed development). This establishes the principle of mitigating impacts on surface water risk as sound practice in line with the evidence base.
- 4.1.5 The SFRA concludes that the principle of development can be supported for each option in flood risk terms, subject to implementation of the above measures, and other recommendations listed with the report. We reach a similar conclusion.

## 5 Sequential Test

- 5.1.1 The Sequential Test Report assesses the three Southborne allocation options against the requirements of the National Planning Policy Framework (NPPF) to determine whether development can be directed to land at the lowest probability of flooding.
- 5.1.2 Drawing upon the findings of the accompanying Level 2 Strategic Flood Risk Assessment (SFRA), the report considers flood risk from all sources and reviews the East, West and Mixed allocation options. It concludes that all three options are sequentially acceptable, with flood risk capable of being appropriately managed through site layout, detailed drainage design and site-specific Flood Risk Assessments.
- 5.1.3 No option is identified as being materially preferable on flood risk grounds.
- 5.1.4 The conclusions suggest that there were previous concerns on deliverability of the proposed bridge crossing for the western development based on potential areas of deep surface water flooding. However, as the Council’s Sequential Test report observed, based on revised EA mapping showing the depth is less significant these concerns have now been reduced.
- 5.1.5 The Sequential Test also acknowledges the requirements for development set out in the SFRA, all of which appear to be achievable for all development scenarios

## 6 Conclusion

- 6.1.1 Taken together, the Sequential Test Report and the Level 2 Strategic Flood Risk Assessment demonstrate that Land to the West of Southborne can be developed without giving rise to unacceptable flood risk.
- 6.1.2 Both reports conclude that the identified flood risks are localised, can be effectively mitigated through good site design and drainage strategies, and do not present a constraint to development.
- 6.1.3 Subject to detailed design, implementation of appropriate SuDS, groundwater management measures and site-specific Flood Risk Assessment at the planning application stage, our interpretation of the evidence confirms that all development scenarios are suitable for development in accordance with national planning policy.

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