Comments on CDC Draft Interim Policy Statement

1.3 Parishes which made a **neighbourhood plan** allocating housing to meet the requirements of the existing Local Plan should be treated as though they have made a plan within the last two years, as they have been unable to update/redo their existing neighbourhood plans due to the uncertainties surrounding the now-suspended plan.

2.3 **Sustainable locations** need to be defined as sustainable for the long-term. The Environment Agency advises local authorities to plan for flood and coastal risk up to 2065.[[1]](#footnote-1) NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).” The coastal and harbour settlements in Chichester District will face significant flood risk by 2065. In October 2019, the House of Commons Environment Food and Rural Affairs Committee urged local authorities to take a more proactive approach to planning in coastal areas and avoid inappropriate development in areas at risk from future flooding or erosion.[[2]](#footnote-2)

3.1 The reduction of future climate mitigation flexibility both on the site and in the wider area will be regarded as an **adverse impact** of development. No new development should be permitted on sites which could be inundated due to rising sea levels within the next 100 years – such sites are no longer considered sustainable by most scientists. Chichester District Council should use high climate change allowances (++) to evaluate housing developments which will face much higher risk in the future.

3.2 **Section 6 and 7 of the NPPF** specifically mentions Sites of Special Scientific Interest; irreplaceable habitats, and areas at risk of flooding or coastal change. Due to the known vulnerability of the Chichester coastline to sea level rise, sites close to the harbour or within one mile of the open coast should be precluded from development until an updated Strategic Flood Risk Assessment of the Chichester District has been undertaken factoring in predicted sea level rise over the next 100 years. The area’s existing wetlands are of national and international importance both because of their biodiversity and their high capacity to absorb CO2. Sea level rise will result in coastal squeeze and loss of irreplaceable wetland, development near to the coast or adjacent to coastal settlements will exacerbate coastal squeeze and hinder migration of species and settlements.[[3]](#footnote-3)

4.5 **Settlement hierarchy** needs to be adjusted to reflect the fact that Chichester’s coastal and harbour communities will face materially increased, possibly catastrophic, flood risk by 2065. CDC may need to consider relocation of some communities in the future so should significantly restrict any expansion of coastal and harbour communities.

4.6 **Density levels** should also reflect the physical ability of the site to absorb/drain flood water, whether ground water, surface water, fluvial or coastal flooding. Developers need to account for the fact that sud systems become compromised on sites where water tables are high.

4.7 **Highways access** needs to consider where residents likely will be working and/or seeking higher education/training and what other commuter choices are available including different road options, congestion issues, public transport and cycling facilities and distance. Settlements with no higher education/training facilities and low employment and accessed from only one direction (such as coastal settlements) should be considered as isolated and remote. This reflects the fact that the 2014-2029 CLP limited housing numbers due to traffic access and congestion issues on the coastal peninsula. These access constraints were confirmed as valid by the Government Planning Inspectors Report on the 2014-2029 Local Plan and have not changed.[[4]](#footnote-4)

**Flood risk** needs to take into account the most recent scientific and planning research. The EA currently predicts sea level rise of up to 1.6 metres for the south east coastline by 2125 but it states that predictions will have to be constantly be revised. US based Climate Central predicts sea level rise of up to 3 metres by 2110 at current CO2 emission levels. Either of these predictions would result in continual inundation of sea water across the Manhood peninsula and in all the coastal and harbour settlements.[[5]](#footnote-5) It is clear that local protection is low by international standards. Under current practice in developed countries, acceptable levels of coastal flood risk are often based upon specific flood return periods, such as the 100-year (with 1 % annual expected probability of occurrence [AEP]. Most developed countries build to protect against an AEP of 1%. The majority of coastal and tidal defences in the Chichester District, however, currently provide a standard of protection against an event with an AEP of 4% or 5%. A Swedish lidar study warns that future inundation in the coastal areas of the South East of England needs to be factored into a long-term planning strategy. The study includes the Chichester coastal plain, which is especially vulnerable.[[6]](#footnote-6)  The Manhood Peninsula is at particularly high risk of flooding as topography in this region is typically less than 5 m above current mean sea level. Even under moderate carbon emission scenarios (known as the RCP4.5 emission projections), without adaption or wide scale defence infrastructure, by 2050, highly populated areas of the Chichester district will fall below mean sea level. By 2100, the Witterings, Bracklesham, Selsey, Birdham, Almodington and Sidlesham will be subject to permanent inundation. When the annual flood event is considered, most regions south of Chichester city will be inundated regularly by 2100. The main areas at risk are Pagham, Selsey and the Witterings with 20,000 permanent residents, and thousands of visitors each year. Additionally, standards of protection are low in the Chichester region and are unlikely to be improved.[[7]](#footnote-7)

4.8 As a council that has declared a Climate Change Emergency, CDC should be taking significant note of emerging planning policies and guidance relating to climate mitigation particularly regarding flood risk and CO2 emissions.

**Policy**

6.1 …“in accessible **AND SAFE** locations.” Development proposals shall be in accordance with the Council’s declaration of a Climate Change Emergency. Safety from future flood risk is a critical planning aspect which needs to be included in the Interim Housing Policy Statement due to Chichester District’s particular vulnerability to catastrophic flood risk from rising sea levels. In 2001 Dutch and British planners and water/coastal engineers described all land below 5 metres on Chichester’s coastal hinterland as ‘unsafe’ for development due to fluvial and coastal flood risk.[[8]](#footnote-8) Since 2001 predicted sea level rise has increased significantly. Until a comprehensive and updated Strategic Flood Risk Assessment has been undertaken for the district in line with current predicted sea level rises and expected planning guidance changes, only sites above 7 metres above sea level should be considered as sustainable sites for new development.[[9]](#footnote-9) Allowances for climate change over the lifetime of a proposed development must be made in line with the latest guidance for climate change. Chichester District Council's existing Strategic Flood Risk Assessment has separate high climate change allowances (referred to as high++) that only apply in assessments for developments that are very sensitive to flood risk, for example large scale energy generating infrastructure, and that have lifetimes beyond the end of the century. [[10]](#footnote-10) Until an updated SFRA is completed Chichester District Council should use these high climate change allowances to evaluate all proposed housing developments which will face much higher risk in the future.

6.2.2 In the absence of a Local Plan, settlement hierarchy must take into account CDC’s declaration of a Climate Change Emergency, recent advice from the Environment Agency, Parliament and the Committee for Climate Change about the need for long term flood risk planning, and the reduced sustainability of any settlements which face significantly increased flood risk this century. The Environment Agency advises local authorities to plan for flood and coastal risk up to 2065.[[11]](#footnote-11) NPPF states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).” The coastal and harbour settlements in Chichester District will face significant flood risk by 2065.

6.2.6 Strategic Wildlife Corridors should include allowance for corridors allowing species to move between wetlands as sea levels rise. Chichester district’s wetlands are of national and international importance both because of their biodiversity and their high capacity to absorb CO2. Sea level rise will result in coastal squeeze and loss of irreplaceable wetland without the ability for it to move inland. Development adjacent or close to coastal and harbour settlements will exacerbate coastal squeeze and hinder the opportunity for species and settlement migration.[[12]](#footnote-12)

6.2.7 Necessary infrastructure should include flood mitigation and flood defence infrastructure that will be required for the lifetime of the development. In the case of housing this should be for at least 50 years and ideally 100 years, in line with the Council’s declaration of a Climate Change Emergency and the Environment Agency’s and Committee for Climate Change’s recommendation for long term flood planning.

6.2.8 Developers must include in the Sustainability and Design and Access statements evidence that the development site will be free from flood risk until 2065 in accordance with EA recommendation.[[13]](#footnote-13)

6.2.10 Development should be located with reliable vehicular and public transport or cycle accessibility to Chichester or the nearest settlement with employment and higher education/training facilities.

6.2.11. All flood risk assessments should be informed by the most recent climate change allowances and sea level rises published by the Environment Agency. For sites close to the harbour or within one mile of the open coast a precautionary approach will be needed to allow for variance in sea level rise predictions. Avoid new development in areas at risk of inundation and increase regional standards of protection to levels approximating an annual expected probability of occurrence of 0.01%. Until a strategic Local Plan has been produced which fully accounts for the latest sea level rise predictions on the south coast and in line with CDC’s declaration of a Climate Change Emergency, sites close to the coast and less than 7m above sea level should be considered inappropriate for development and avoided as not being sustainable in the long term.[[14]](#footnote-14) Chichester District Council will use high climate change allowances (++) to evaluate housing developments in locations which will face much higher risk in the future.

1. <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065> https://www.gov.uk/government/publications/flood-and-coastal-risk-management-in-england-long-term-investment/long-term-investment-scenarios-ltis-2019 [↑](#footnote-ref-1)
2. <https://publications.parliament.uk/pa/cm201920/cmselect/cmenvfru/56/56.pdf>

<https://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/inquiries/parliament-2017/coastal-flooding-and-adaptation-to-climate-change-17-19/> [↑](#footnote-ref-2)
3. <https://www.carbonbrief.org/restoring-soils-could-remove-up-to-5-5bn-tonnes-of-greenhouse-gases-every-year> [↑](#footnote-ref-3)
4. http://www.chichester.gov.uk/CHttpHandler.ashx?id=24307&p=0 [↑](#footnote-ref-4)
5. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#table-3> <https://ss2.climatecentral.org/#12/50.7693/-0.8715?show=satellite&projections=1-K14_RCP85-SLR&level=3&unit=meters&pois=hide> [↑](#footnote-ref-5)
6. [http://lup.lub.lu.se/luur/download?func=downloadFile&recordOId=8937311&fileOId=8937312](http://lup.lub.lu.se/luur/download?func=downloadFile&recordOId=8937311&fileOId=8937312" \t "_blank) [↑](#footnote-ref-6)
7. [13] R. E. Kopp, R. M. Horton, C. M. Little, J. X. Mitrovica, M. Oppenheimer, D. J. Rasmussen, B. H. Strauss, andC. Tebaldi, “Probabilistic 21st and 22nd century sea-level projections at a global network of tide-gauge sites," *Earth's Future* , vol. 2, no. 8, pp. 383-406; Chichester District Council Level 1 Strategic Flood Risk Assessment; M. Buchanan, R. Kopp, M. Oppenheimer, and C. Te-

baldi, “Allowances for evolving coastal flood risk under uncertain local sea-level rise," *Climatic Change* ,vol. 137, 10, 2016; Joseph Lockwood, Department of Geoscience, Princeton University, USA; Department of Atmospheric and Oceanic Science, McGill University, CA, *Future Sea Level Rise and Flood Risk in Chichester District* [↑](#footnote-ref-7)
8. *Going Dutch on the Manhood Peninsula,* West Sussex County Council and Nirov, the Netherlands Institute for Planning and Housing, 2001, p 27 [↑](#footnote-ref-8)
9. <https://www.climatecentral.org/news/ipcc-predictions-then-versus-now-15340>; <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827611/Exploratory_sea_level_projections_for_the_UK_to_2300_-_report.pdf> ; [↑](#footnote-ref-9)
10. Chichester district council level 1 strategic flood risk assessment; Joseph Lockwood, Department of Geoscience, Princeton University, USA; Department of Atmospheric and Oceanic Science, McGill University, CA, *Future Sea Level Rise and Flood Risk in Chichester District.*  [↑](#footnote-ref-10)
11. <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065> https://www.gov.uk/government/publications/flood-and-coastal-risk-management-in-england-long-term-investment/long-term-investment-scenarios-ltis-2019 [↑](#footnote-ref-11)
12. <https://www.carbonbrief.org/restoring-soils-could-remove-up-to-5-5bn-tonnes-of-greenhouse-gases-every-year> [↑](#footnote-ref-12)
13. <https://www.gov.uk/government/news/environment-agency-publishes-new-evidence-to-plan-for-flood-and-coastal-risk-up-to-2065> [↑](#footnote-ref-13)
14. <https://coastal.climatecentral.org/map/11/-0.8529/50.7595/?theme=sea_level_rise&map_type=coastal_dem_comparison&contiguous=true&elevation_model=coastal_dem&forecast_year=2100&pathway=rcp85&percentile=p95&return_level=return_level_0&slr_model=kopp_2017>

 <https://www.google.co.uk/amp/s/www.carbonbrief.org/interactive-what-will-2c-and-4c-of-warming-mean-for-global-sea-level-rise/amp>

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<https://www.nytimes.com/interactive/2019/10/29/climate/coastal-cities-underwater.html>

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<https://www.scientificamerican.com/article/sea-level-could-rise-at-least-6-meters/> [↑](#footnote-ref-14)