

From: Simon Davis

Sent: 16 September 2022 17:35

To: PlanningSSD 

Subject: P/178/21/OUT 106 new homes at Land West of Pagham Road, Pagham

Dear Environment Agency,

You have been notified this week of an appeal concerning this application (see attached). We refused the application for 5 reasons, one of which was

“The proposal conflicts with policies W DM2 and ECC SP1 of the Arun Local Plan and paras 30-32 of the NPPF in that the submitted Flood Risk Assessment does not correctly identify sources of flood risk and does not take into account the impacts of climate change.”

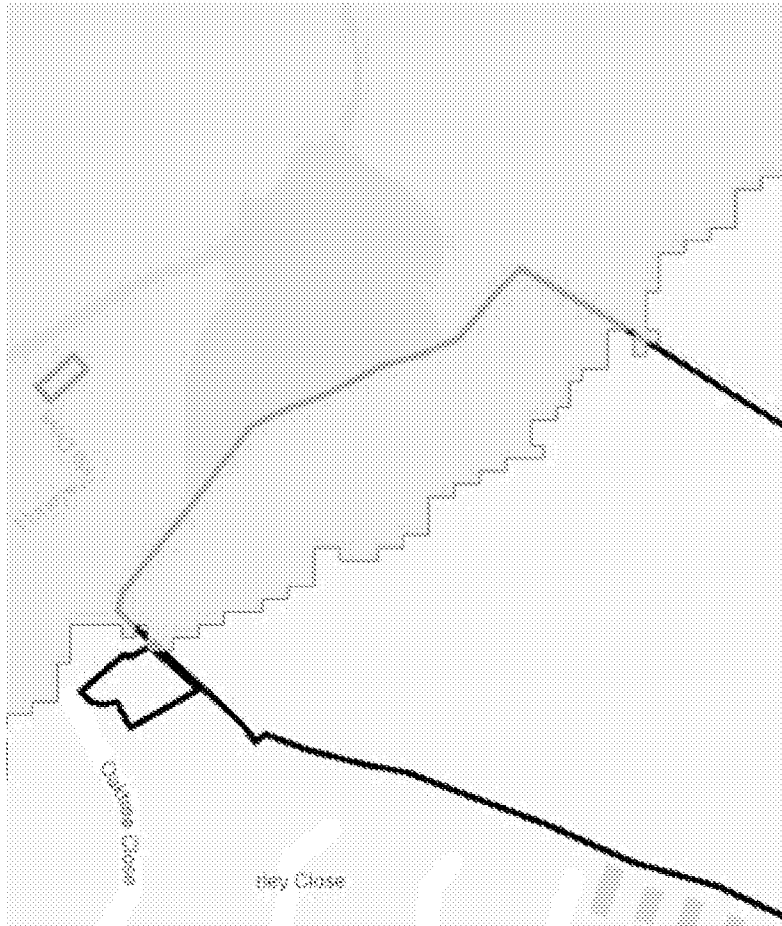
This was partly on the basis of your objection and partly because we identified the site as partially within land subject to future flood risk (as per our SFRA mapping).

We will need your further comments on the appeal as this will be determined by an informal hearing. The appellants have provided further comments on flood risk in their two statements (June and August 2022). Furthermore, the appellant provides a map obtained from the EA showing undefended flood risk in 2115. This shows a different (lesser) flood extent to that provided by our SFRA for 2111. Can you confirm that the mapping provided is from the EA and can you comment whether it should be treated as more up-to-date than our SFRA (2016)? They state:

The Environment Agency's latest flood map for planning is shown (below) at Appendix 2. This shows the 2115 defended condition with climate change and is more up to date than the Council's 2016 Strategic Flood Risk Assessment. The Illustrative Masterplan does not site more vulnerable development (housing) in the area shown on the EA's map as Zones 2 and 3. Even using the Council's out of date SFRA, all housing can easily be accommodated within Zone 1 with minor re-ordering of the illustrative layout.



Our SFRA mapping for 2111 shows the following:



I hope you can assist. If you were to withdraw your objection and the future flood risk mapping that they provide is more up-to-date than ours then I can't see how we can defend the refusal reason.

Kind Regards

Simon J Davis MRTPI

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Our priorities...



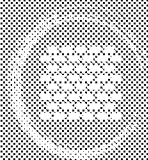
**Improving the
wellbeing of Arun**



**Delivering the
right services in
the right places**



**Supporting our
environment
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economic potential**

