Dear Mrs Gardner,

CM/8/21/PL and CM/10/21/PL

OBJECTION

I make this representation in the shadow of your Councils refusals of earlier applications CM/25/20/PL, CM/60/19/CLE, CM/38/18/PL my comments on those applications still stand.

I need not remind you that applications within the Littlehampton to Middleton strategic gap will be subjected to utmost scrutiny by your council and that this site is an incredibly sensitive site.

I think 3 matters lie before us;

1) The source of the water shown in the photographs
2) The need for the bunding and pond
3) The need of the corten steel and shipping container fencing

The applicant has submitted some photographs of some water within the site and has suggested a theory of the source of that water. The difficulty with retrospectively justifying the works to create the bunds that the applicant had installed years before the supposed flooding would occur is all the facts need to add up and they simply do not.

The matter that the EA and Arun's flood engineer have not raised objections is interesting but does not assist here when you as case officer are seeking matters of material fact which you can weigh to make your recommendation for a decision to be made.

At paragraph 2.8 of the planning statement it is stated; *"We have been advised that the site has flooded 5 times over the last 10 years…….This is a material factor weighing in support of the proposals".*

There is no evidence submitted that this site has flooded from the sea so frequently in recent history or at all, I know the site well and I certainly do not concur with this statement.

Paragraph 2.8 goes on to say; *"….flooding from storm Ciara and storm Dennis pushed water further into the site through the site entrance……. This is a material factor weighing in support of the proposals".*

The sea lies around 100m to the south of the site at this location the beach has been accreting shingle for decades (non-erodable). It is a matter of fact that the EA has not carried out any flood defence works in this location ever because there has never been any need to do so, flood risk improvements happen here under natural process alone. See the attached extract from Appendix P para 9.9 b). The fact that the EA are reducing their management input elsewhere is irrelevant to this planning application when considering this non-erodable frontage as their input has at no time been required in front of the Mill.

But the applicant does not suggest this location to have been the source of floodwater, preferring an alternative hypothesis that the overtopping event that occurred in February 2020 around 500m to the east somehow was the source of the water shown in the photographs.

At para 3.6 of the planning statement the author draws your attention to para 3.1.7 of the July 2015 River Arun to Pagham Flood and Coastal Erosion Risk Management Strategy; and makes the claim that the application site is included withing the residential properties referred to and shows an extract which concludes; *"The floodplain between Climping and the River Arun is hydraulically linked with a common low point at Rope Walk. This means that from the breach point at Climping, tidal waters would flow across the floodplain towards Rope Walk."* There's No mention of the Mill.

Arun to Pagham - Strategy Appendix P (v4.0 Oct. 2014).pdf - Adobe Acrobat Pro DC (32-bit)

File Edit View Sign Window Help

Home Tools Arun to Pagham - ... ×

53 / 92 79.3%

ATKIN

9.9 Erosion at Climping

A stretch of coastline can be categorised by as either "erodable" or "non-erodable". This is the approach the Environment Agency uses for frontages included in the National Erosion Risk Mapping Project. This methodology helps to avoid double counting damages for properties at both erosion risk and flood risk in economic analyses. Arun District Council provided advice on what potential erosion might be expected for the "erosion" frontages in the Arun to Pagham FCRM Strategy. This advice was based on historical mapping (back to the 1600s). The assessment then took account of what defences were in place. Climping is identified as "non-erodable", as flooding is the primary risk here. However, even though Climping is non-erodable, the Strategy has assessed the amount of land that might be permanently lost to erosion in a Do Nothing scenario. There are a number of factors that should be taken account of in arriving at this value for the Climping frontage. These include the:

- Recycling that takes place to mitigate the scour immediately down drift of Poole Place.
- Protection provided (against the prevailing wind/wave attack) by the Poole Place groyne.
- Processes by which a breach at the Climping Non-legal frontage might form.
- Possible date of that breach.

The assessment concluded that:

a) The Climping Legal frontage will not erode (as the beach here will continue to be maintained)

b) The dunes are and will probably continue accreting, but

c) There may be a breach in the centre portion of the Climping Non-legal frontage.

d) However, this breach would not lead to linear erosion behind it.

It is worth noting that agricultural land is written off when the flood risk becomes more frequent than 1 in 10 years. It is likely, therefore, that any agricultural land that may be at risk of erosion, would already have been written off by flooding.

The Elmer erosion rate used was a "worst case" scenario, and this was applied to Climping. An annual erosion rate of 0.5m per year for the first 50 years was used, followed by a further total of 10m (covering the period between years 50 to 100). The total erosion over the 100 year appraisal period was thus calculated to be 35m. There are currently no properties within this potential erosion zone at Climping (35m behind the shore crest).

At para 3.10 of the planning statement the applicant reveals the supposed source of flooding shown in the photographs; *"The EA do not hold records of flooding events, but they acknowledge that a flood in 2020, which caused significant damage to my clients site, was caused by a breech [sic] in the coastal defences."*

This can only mean that this planning application is being justified on the premise that the floodwaters ran up hill from an event that took place half a kilometre away. I have attached Lidar data that shows the black wrack line as surveyed by the Environment Agency in the afternoon of Monday 10th February 2020 with a photograph of the detritus strewn across the site.

Aerial footage taken as the events occurred support this, the Mill can be seen in the footage high and dry with no water having gone that way.

https://www.dailymail.co.uk/video/ukweather/video-2109210/Video-Sea-defences-fail-West-Sussex-causing-extreme-flooding.html

It is a matter of fact that no water from that event came anywhere close to the Mill, so the source of the flooding remains a mystery and you need to apply weight to material facts when making your decision.

It is important to consider that an alternative source of the water might be groundwater, were that to be the case then the introduced bunding that now surrounds the site may have a damaging effect on the fabric of the listed buildings as the water can no longer escape.

I can see no need for these bunds. It is worth noting that in recent days the applicant has raised many of the banks including along the northern boundary and in doing so has completely smothered the newly planted trees, further damaged the existing trees, setting back the nature recovery once again and during bird nesting season. The bund there is now of such a height that footpath users can no longer see into the site where so much unauthorised activity has taken place and much of it upon land that we own, it certainly now acts as a visibility barrier.

The corten fencing and shipping containers are apparently justified *"to withstand the pressure and force of coastal flooding which hits the site at its entrance".* Note the use of the present tense.

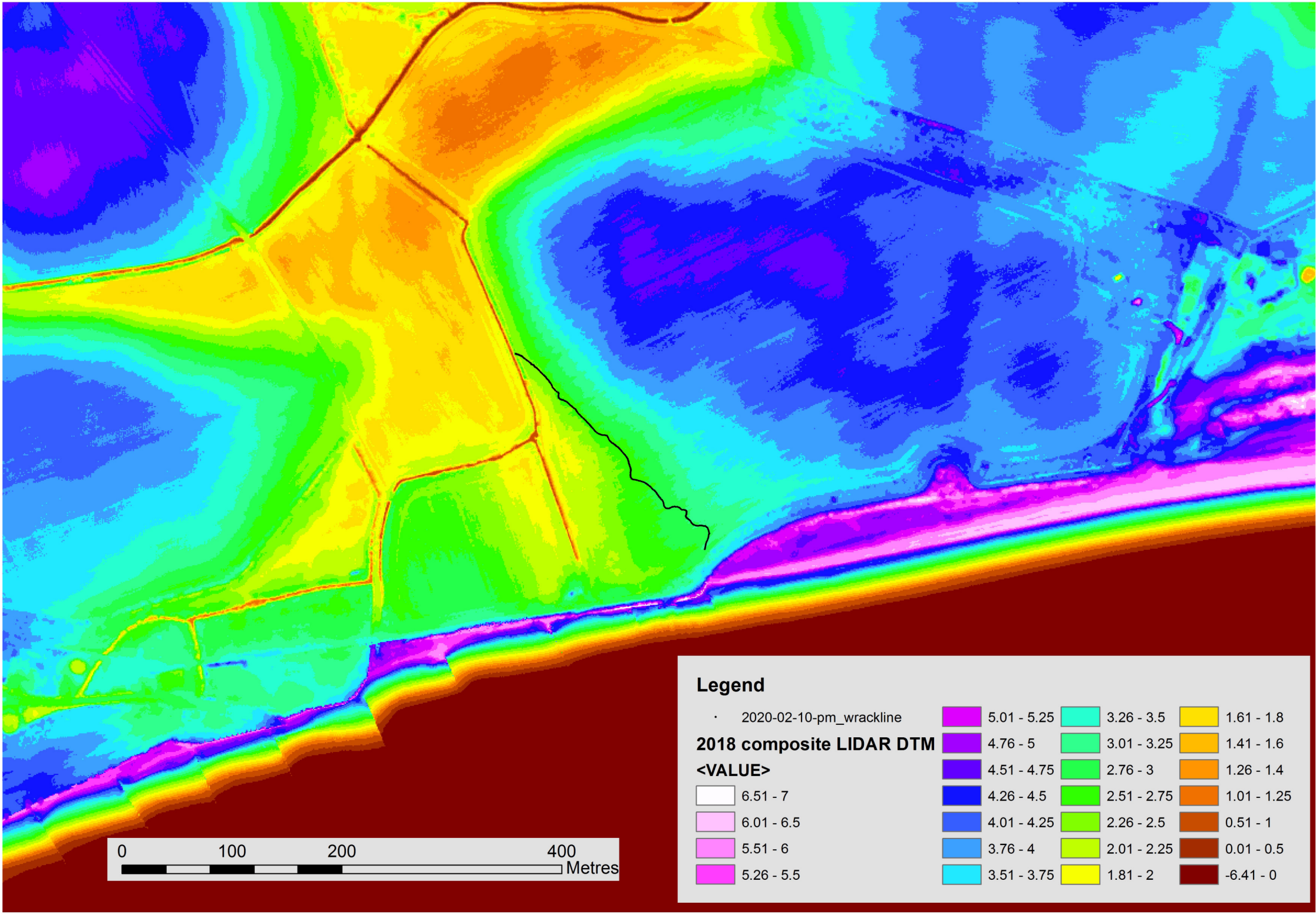
This justification begs the question, how is it that so much shrubbery and trees exist between the entrance gates and the coast that is completely unaffected by this imagined force and pressure?

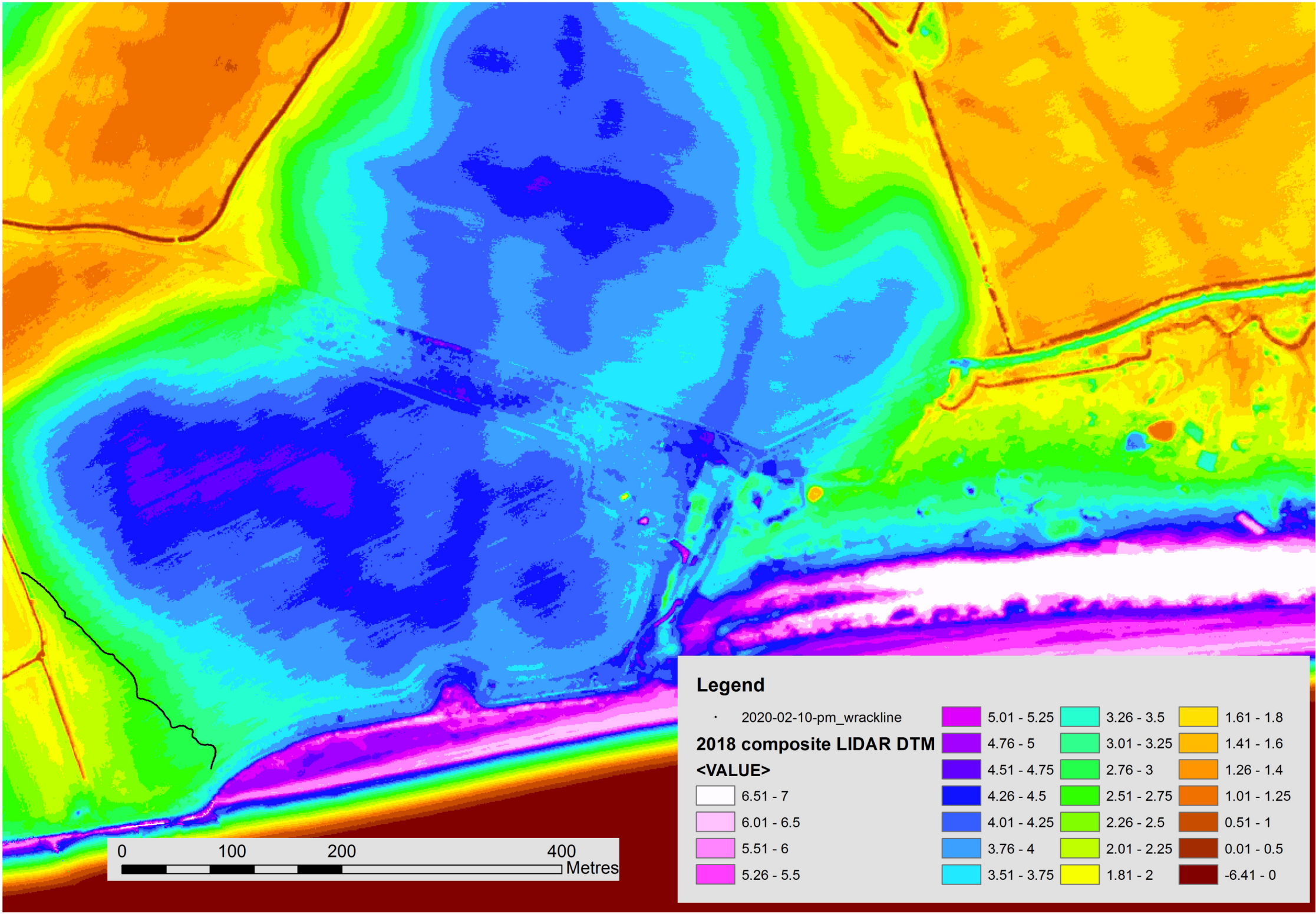
The tree consultant goes to great pains to describe the trees as being of low quality due to the coastal effects. ANY trees in this general coastal environment are of high value and of course they will be impacted by the harsh environment, it should not mean they are classified as being of low value. For any trees or scrub to have established south of the Mill will have required many years of being unaffected by the sea. The fact that they exist is substantial proof that the entrance of the Mill has at no time ever been subjected to the forces being suggested to justify these otherwise unnecessary works.

Whether they will be needed in future years (by 2115 is mentioned) is an entirely different proposition and does not justify them in the present.

We have the benefit of seeing them installed as the applicant has presumed planning permission for them will be obtained; they are certainly out of keeping against the backdrop of the SSSI sand dunes, open countryside and historic traditional Mill buildings. It is noteworthy that the applicant would choose shipping containers as his choice of building material knowing that your council previously refused consent to even have them on the site even on a temporary basis due to their harmful visual impact.

You are being asked to balance the visual impact of these works against the weight of flood risk evidence.


Legend
2020-02-10-pm_wrackline
2018 composite LIDAR DTM
<VALUE>
6.51 - 7
6.01 - 6.5
5.51 - 6
5.26 - 5.5
5.01 - 5.25
4.76 - 5
4.51 - 4.75
4.26 - 4.5
4.01 - 4.25
3.76 - 4
3.51 - 3.75
3.26 - 3.5
3.01 - 3.25
2.76 - 3
2.51 - 2.75
2.26 - 2.5
2.01 - 2.25
1.81 - 2
1.61 - 1.8
1.41 - 1.6
1.26 - 1.4
1.01 - 1.25
0.51 - 1
0.01 - 0.5
-6.41 - 0
0
100
200
400
Metres


Legend
2020-02-10-pm_wrackline
2018 composite LIDAR DTM
<VALUE>
6.51 - 7
6.01 - 6.5
5.51 - 6
5.26 - 5.5
5.01 - 5.25
4.76 - 5
4.51 - 4.75
4.26 - 4.5
4.01 - 4.25
3.76 - 4
3.51 - 3.75
3.26 - 3.5
3.01 - 3.25
2.76 - 3
2.51 - 2.75
2.26 - 2.5
2.01 - 2.25
1.81 - 2
1.61 - 1.8
1.41 - 1.6
1.26 - 1.4
1.01 - 1.25
0.51 - 1
0.01 - 0.5
-6.41 - 0
0
100
200
400
Metres

2020-02-10_121600_4196