

From: Amanda Scholes on behalf of Planning.Responses
Sent: 22 December 2020 10:16
To: Planning Scanning
Subject: FW: Planning P/108/20/HH

Amanda Scholes | Receptionist, Department, [Arun District Council](#) | Location: Ground Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37736 | External: +44 (0) 1903 737500 ext 37736 | E-mail: amanda.scholes@arun.gov.uk



Visit Arun's web site at [Error! Hyperlink reference not valid.](#)



Save the environment - think before you print.

From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Sent: 21 December 2020 17:07
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: Planning P/108/20/HH

Dear Sir/Madam,

Single storey rear extension including demolition of existing conservatory. 8 x rooflights and alterations to roof over front bedroom from gable to flat roof and conversion of central roof from hip to gable end with alteration to fenestration (P/108/20/HH)

**32 East Front Road
Pagham
PO21 4SU**

Thank you for the consultation on the above mentioned application.

Coast Protection are not in a position to object to the aforementioned application based on planning legislation and current policies. Therefore, Coast Protection have **No objection**.

Informative:

However, I would like to take this opportunity to make the Case Officer and Applicant aware of the following;

- Application **P/117/19/PL** which consisted of a replacement dwelling in very close proximity to the aforementioned application was previously refused using the following rationale; "The

proposal conflicts with relevant Development Plan policies in that the development is in an unsustainable location, susceptible to coastal erosion and ensuing flooding, contrary to policy ECC SP1 of the Arun Local Plan and paragraphs 149, 155 and 167 of the NPPF 2019.” I felt it necessary to raise this point as the area in question is also susceptible to coastal erosion and ensuing flooding. It is the extent of redevelopment and associated restrictions, in a unsustainable location, that remains unclear to the Coastal Engineer.

Under section 55 of “The Town and Country Planning Act 1990” the meaning of development is given as;

“Subject to the following provisions of this section, in this Act, except where the context otherwise requires, “development,” means the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.

For the purposes of this Act “ building operations ” includes—

(a)demolition of buildings;

(b)rebuilding;

(c)structural alterations of or additions to buildings; and

(d)other operations normally undertaken by a person carrying on business as a builder.”

- The property owner is fully aware of the erosion risk and has contacted Arun District Council on numerous occasions requesting “Urgent Action” following episodes of erosion.
- Coast Protection can therefore assume that should the application be approved the Applicant is aware of the risks associated with carrying out development at the proposed location.
- Notwithstanding previous coast protection operations, the area remains susceptible to coastal erosion. Permitting the development shall not set precedent that the local authority will continue to exercise its **permissive powers** and carry out coast protection operations.

The situation at East Front Road is unlikely to improve in the short-term.

Background:

Pagham beach is a highly designated site in terms of geomorphology, flora and fauna. The beach upon which the estate is constructed is also dynamic and in the past 10 – 15 years we have observed growth, breach and re-distribution of a shingle spit that emanates from the Church Norton side of the harbour channel.

This may seem like a long distance away from the site in question but coastal processes are such that effects (natural or otherwise) can be seen over considerable distanced and over long time scales.

Pagham beach has suffered from erosion over the past 10 years or so in various places – primarily those places have correlated to spit length. The spit breached naturally in 2016 but the effects of the system development are still evident. Equally, the change in coastal processes is likely to have contributed to the erosion on East Front Road as the beach reorganises finding a new “normal”.

Unfortunately, No. 32 East Front Road is more or less in the centre of the current erosion zone and Arun District Council is spending considerable amounts of money to maintain the beach, reducing flood and erosion risk. Whilst the Shoreline Management Plan policy is to ‘Hold the Line’ and the Coastal Defence Strategy option to achieve that policy is Adaptive Management, there is no guarantee of funding to achieve it.

A Coastal Change Management Area has not been declared for this part of the coastline but the issues above highlight Pagham as a dynamic area that leads me to question the appropriateness of the development, at this time.

Conclusion:

In conclusion, given planning legislation, Coast Protection are not in a position to object to the aforementioned application. However, the vulnerability of the site is unlikely to improve in the short-term with **funding and management challenges still prevalent.**

Other general comments that may be of interest to the Applicant are as follows:

- The Environment Agency flood maps indicate that the proposal is located in close proximity to Flood Zone 2 & Flood Zone 3. It should be understood that the mapping provided by the Environment Agency is indicative and subject to change as new information / modelling becomes available.
- There can be no guarantee that homes situated next to the sea are 100% safe. Living close to any expanse of water always carries some level of risk; homeowners should be aware of this and should take appropriate precautionary measures if they consider it necessary.
- The Beachy Head to Selsey Bill Shoreline Management Plan (SMP) provides a high level assessment of the risks associated with coastal evolution and presents a policy framework to address these risks. <http://www.se-coastalgroup.org.uk/wp-content/uploads/2013/10/Beachy-Head-to-Selsey-Bill-SMP-FINAL.pdf>
- The 'Pagham to East Head Coastal Defence Strategy' sits below the SMP and suggests how best to manage coastal flooding and erosion risk over a 100 year strategy period for smaller lengths of coastline. The Strategy has identified shortlisted options on how this can be achieved, provided funding is available. Full documentation can be found at: <https://drive.google.com/file/d/1kLyfHYo-4grjVWLpiGmYjWP7idZpJFG/view>
- The Government's current strategy for funding capital works (e.g. major groyne replacement schemes) is known as Partnership Funding. If or when any Partnership Funding might be required direct beneficiaries of the defence are likely to be approached. I.e. those likely to be at risk from flooding or erosion within the timescale of the scheme. I have provided link at the bottom of the page which explains partnership funding in greater detail.

<https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding>

Regards,

Karl McLaughlin

Coastal Engineer, Engineering Department

T: 01903 737814

E: Karl.McLaughlin@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

www.arun.gov.uk



Sign up to our newsletter [here](#)



