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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Sent: 19 November 2021 08:48
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Subject: RE: Planning Consultation on: P/143/21/PL

Dear Sir/ Madam,

Demolition of existing dwelling, erection of 1 No. replacement dwelling and detached garage/boat store. (P/143/21/PL)

**25 West Front Road,
Pagham,
PO21 4SY**

On the 6th October 2021, The Planning Policy Committee agreed a new interim framework for assessing planning applications at Pagham while the implications of Coastal Change Management Area (CCMA) are explored.

I have tabulated the agreed approach below;

<u>Category</u> <u>ref.</u>	<u>Development Type</u>	<u>Description</u>	<u>Decision</u>
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1	All new development	-	Not permitted
2	All redevelopment – (new structure[s])	Where there is significantly raised level of risk now or in predictions covering the ensuing 5 years	Not permitted
3	All redevelopment (new structure[s])	No raised level of risk now or in predictions covering the ensuing 5 years and AND no occupier density increase	Permitted finished floor levels to be at least 300mm above predicted flood levels in all cases
4	Reconstruction	Using substantial portions of the existing building – e.g. re-roofing or fenestration	Permitted with increased property level protection where practicable
5	Non-habitable development	e.g. garages, porches, non-habitable annexes	Permitted where otherwise allowed – conditioned upon continuing non-habitable status
6	Other risk reduction related development	-	permitted where otherwise allowed.

Link to draft minutes - [https://democracy.arun.gov.uk/documents/g1458/Printed minutes 06th-Oct-2021 18:00 Planning Policy Committee.pdf?T=1](https://democracy.arun.gov.uk/documents/g1458/Printed%20minutes%2006th-Oct-2021%2018:00%20Planning%20Policy%20Committee.pdf?T=1)

Link to agenda and report - [\(Public Pack\)Agenda Document for Planning Policy Committee, 06/10/2021 18:00 \(arun.gov.uk\)](#)

When assessing the proposal against the interim framework I believe this application will fall into category 3. I have listed my reasons below and given a quick explanation of the site history and risks associated with living/developing in close proximity to water bodies.

- Due to the dynamicity of the macro coastal system and the proximity of the proposal to the coastline it is difficult to say with confidence that the site would not be at an increased level of risk within the next five years. However, having assessed the beach profile data, for which the transects are either side of the property, the beach volume has recovered beyond the 2010 volumes (pre-spit volumes).
- The rapid deterioration of the foreshore in Jan 2014, and subsequent recovery in October 2016, demonstrates how quickly this piece of coastline can change.
- The recovery process witnessed in 2016 can be attributed to the natural breach and distribution of the 2016 spit. The severed section of spit was gradually worked onshore providing a large pile of shingle that nourished the beach. However, the reason for deterioration cannot be conclusively defined. This is because coastal process are complex with numerous variables affecting the outcome for the coastline.
- Arun District Council carried out stabilisation works to the foreshore adjacent to the development in 2015 & 2016.
- The site does not increase the raised level of risk and decreases occupier density (4 bed to 3 bed).

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 distances 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

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 and that leads me to question the appropriateness of the development, at this time. Therefore, all development should be considered with this in mind.

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

- 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 Environment Agency flood maps indicate that the proposal is located in 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.
- The Environment Agency have produced National Coastal Erosion Risk Mapping. This dataset provides detail on the predicted erosion rates for the short, medium and long term, along with the shoreline management Plan for each epoch.
<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=9cef4a084bbb4954b970cd35b099d94c>
- 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-4qrIWWLpiGmYiWP7idZpJFG/view>
- Living and building on the Coast In Arun <https://www.arun.gov.uk/living-and-building-on-the-coast>
- 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 a link 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

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 17 November 2021 17:25

To: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>

Subject: Planning Consultation on: P/143/21/PL

To: Engineers (Coastal Protection)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: P/143/21/PL

Registered: 5th October 2021

Site Address: 25 West Front Road Pagham PO21 4SY

Grid Reference: 488992 97136

Description of Works: Demolition of existing dwelling, erection of 1 No. replacement dwelling and detached garage/boat store.

The Council have received the above application.

[Click here to view the application details](#)

This application has been identified as CIL Liab. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for on site mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 15th November 2021 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider
<https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://app.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make

Yours sincerely

Maria Tomalova

Planning Officer- Arun District Council

Telephone: 01903 737510

Email: maria.tomalova@arun.gov.uk

PLCONSULT (CDS) 2020