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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: 28 January 2022 09:55
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Consultation on: P/168/21/HH

Dear Sir/ Madam,

Erection of single storey rear extension, loft conversion to habitable use and installation of solar panels. (P/168/21/HH)

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

The proposal is located in Flood Zone 2 and Flood Zone 3. As such, the applicant is required to provide a Site Specific Flood Risk Assessment in accordance with Paragraph 168 of the National Planning Policy Framework. The Flood Risk Assessment provided by the applicant is a home buyers survey and does not meet the requirements set out by the Environment Agency.

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;

Category ref.	Development Type	Description	Decision
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/q1458/Printed minutes 06th-Oct-2021 18.00 Planning Policy Committee.pdf?T=1](https://democracy.arun.gov.uk/documents/q1458/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 has recovered to 2013 volumes. The 2013 volumes are not the highest recorded but they do represent volumes that are at, or above, average.
- The rapid deterioration of the foreshore in September 2012, and subsequent recovery in Feb 2019, demonstrates how quickly this piece of coastline can change.
- The recovery process witnessed in 2019 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 2014 – 2018.
- The site does not increase the raised level of risk with no change in occupier density.

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

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/1kLvfHYo-4qrVWWLpiGmYiWP7idZpJFG/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

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

Sent: 04 January 2022 09:49

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

Subject: Planning Consultation on: P/168/21/HH

To: **Engineers (Coastal Protection)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

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

Planning Permission for Works or Extension to a Dwelling

Application No: P/168/21/HH

Registered: 14th December 2021

Site Address: 5 West Front Road Pagham PO21 4SY

Grid Reference: 489094 97223

Description of Works: Erection of single storey rear extension, loft conversion to habitable use and installation of solar panels.

The Council have received the above application.

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

Should you have any comments to make, these should be sent by replying to this email by 21st January 2022 . 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.

When the appeal relates to a householder application there will be no opportunity to make further comments.

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

Yours sincerely

Amber Willard

Planning Officer- Arun District Council

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Email: amber.willard@arun.gov.uk

PLCONSULT (CDB) 2020