

Planning and Heritage Statement (including Design and Access references)

**Pagham Yacht Club, 1 West Front Road, Pagham, West Sussex
PO21 4SY**

Formation of side porch using the existing covered area and provision of access ramp; increase height of front and side boundary walls to form bike store (all new floor area would not exceed 25 sqm); alterations to southern beach elevation (including storm wall and anchor point); installation of 61 solar panels and internal alterations



Photo 1 – View towards West Front Road front elevation

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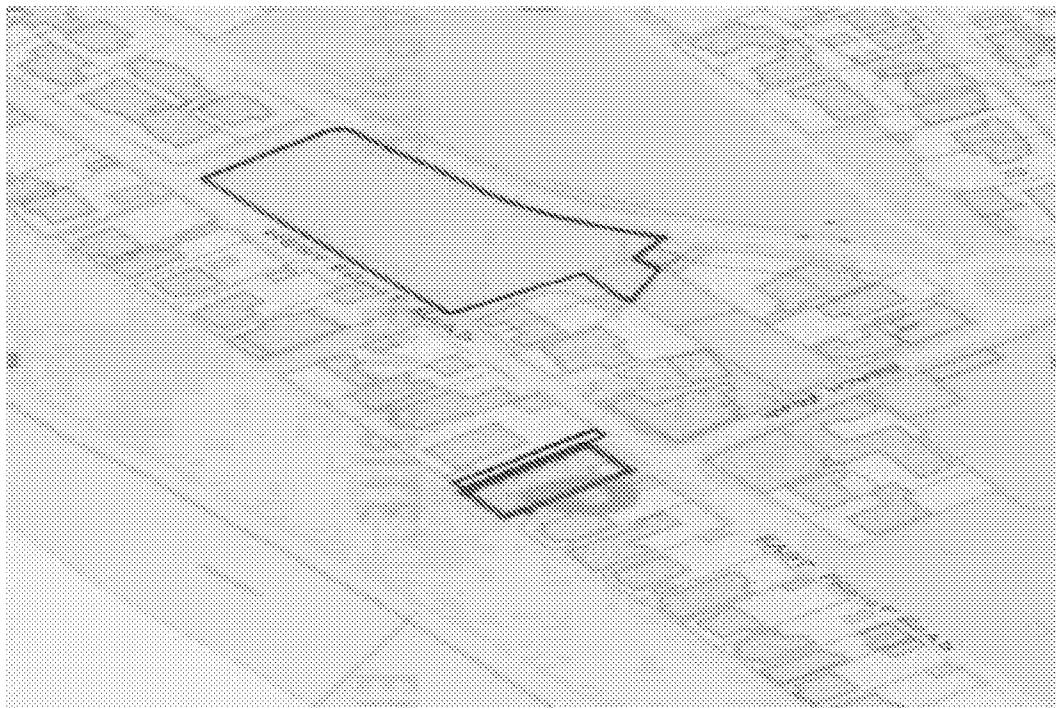
7.0 Conclusions

1. **Introducing Pagham Yacht Club**

- 1.1. Pagham Yacht Club moved into it's current premises at 1 West Front Road, nearly 50 years ago and recently celebrated it's 60th year as a Club in 2024.
- 1.2. The Club is very well established in the local community and has served local people with water-based sports opportunities that have included mainly sailing and fishing, but also more recently, more modern sports such as paddle boarding, kayaking and wind surfing. An open water swimming group are also associated with the Club.
- 1.3. The Club has a membership of around 400, consisting of all age groups, and in particular the Club welcomes families, and through this policy, we have a thriving Youth Section. The youth members are key to safeguarding the future of the Club. Club membership includes young and old, those that identify with an ethnically diverse community and others that have a longstanding and limiting disability or illness.
- 1.4. Over recent years Pagham Yacht Club has strengthened it's relationships with the wider community, including those in guiding and scouting, as well as other youth groups, and with The Aldingbourne Trust. Through the proposed development works, the Club aims to enhance the accommodation and services that we provide. As part of the Club ethos, we regularly raise money for charities, mostly local but some national.
- 1.5. The Club also works closely with Pagham Beach Holdings, landowners in the area, and with Pagham Lagoon Sailing who provide training for young sailors and who store some of their equipment at the Pagham Yacht Club boat and car park.
- 1.6. The Club is licensed with varying opening hours, depending on the time of year, with the summer having longer periods of opening due mainly to the on-water events. The regular days of opening are Wednesday and Friday evenings, Saturdays and Sundays.
- 1.7. Pagham Yacht Club prides itself on it's ability to adapt to changing water sports interests in line with member preferences. In recent times there has been a surge in interest in stand-up paddle boarding, fresh water swimming, kayaking and wind surfing. The Club run a try-sail programme each year allowing non-sailors to 'buddy-up' with experienced sailors, in a safe environment, to try sailing for the first time. Similarly, our angling section are strong in numbers and encourage new members, including youth members to go fishing by boat or from the beach, with experienced fishermen. More recently the Club has introduced the very successful Wednesday Paddler sessions, where we encourage current members, not previously water based, and newcomers to try out on-water activities, that are new to them, to get out on the water and to embrace a healthier lifestyle. These initiatives have proved very successful and have been welcomed by the local community, some of whom have subsequently joined the Club.
- 1.8. The Club now have a good balance between on-water activity and social events that our membership enjoy, with the social events often taking place after our on-water events.
- 1.9. The proposed development works are driven by our aim to improve the on-water sports experience, will provide better facilities for our current members and are not aimed at increasing Club membership.

2. **The Site and Surrounding Area**

- 2.1. The Pagham Yacht Club, 1 West Front Road, Pagham, West Sussex PO21 4SY (main clubhouse building). The site comprises 0.04 hectares and is of rectangular shape. The Club also lease a boat and car park 100m to the west accessed from West Front Road.
- 2.2. The Club demise is shown in two parts: Clubhouse in red on the beach front, a slipway in blue to the west side of the building and a boat/car park also in blue nearby.



Ordnance Survey based plan showing the site and boat/car park

- 2.3. The main premises consist of a mainly single storey building, albeit with a sail-loft on the West Front Road frontage, and a roof top bridge facing the sea. The building was originally a bungalow, comprising two railway carriages perpendicular to the beach and with a single storey roof structure linking the two carriages. The premises currently have two access points for members, at the front to West Front Road (via steps) and at the rear through double doors onto the beach. The internal layout comprises a social area facing the beach, and the functional area consisting of galley, toilets and changing rooms nearer to the West Front Road end of the building. A rib store with sail room above is located nearest to West Front Road.
- 2.4. The boat yard and car park shown blue on the site plan are situated nearby, some 100m to the west. The slipway to the west side of the building and shown in blue and the boat and car park are leased from Pagham Beach Holdings. The main building is owned by Pagham Yacht Club.
- 2.5. To the north side of the premises, looking towards West Front Road, land levels are fairly flat. Moving towards the sea, the levels change, in that they rise towards the top of the foreshore and then fall again towards the low tide level. The rise in levels between West Front Road and the patio, beach side, is approximately 3m.
- 2.6. The site lies within the Built-Up Area Boundary (BUAB), an Area of Character, is within or immediately adjacent to Pagham Harbour Special Protection Area, close to a Site of Special Scientific Interest, Flood Zone 3, and a Coastal Change Management Area.



Photo 2: View from existing main front entrance towards Pagham Beach Club, amusement arcade and Pagham Beach café.

3. Relevant Planning History

3.1. Pagham Yacht Club embraced the pre-application process prior to the submission of this application. We received a response by letter dated 24th July 2024 which was followed up with a meeting. The process has helped us understand the constraints, the relevant policies and in terms of the development considerations, it has encouraged us to proceed but also to understand some of the potential issues that need to be addressed. Our response has been to provide a greater level of detail and to amend the drawings, which now better address the concerns raised.

3.2. The main developmental changes at Pagham Yacht Club have been:

- 1975 - Change of use of 1 West Front Road, from domestic dwelling to yacht clubhouse (P/142/75)
- 1978 - Bridge and sun lounge extension to south side of building (P/99/78)
- 2005 - Major extension to the West Front Road frontage to provide galley, changing accommodation and toilets and sail room (P/14/04)

4. Proposals

4.1. Following the pre-application response on 24th July 2024, Pagham Yacht Club have taken on board the helpful and positive comments and have undertaken a number of changes to the scheme.

4.2. The amendments are mainly:

- Cycle store and the high wall - if you look at the revised visualisations we have addressed ADC's feedback, and these now portray us raising our existing wall (accounting for the sloping site) to around 1.7m to 2m and then utilising a green wall trellis and/or trained tree screen to provide the security required to incentivise cyclists to

use our covered secure store. I feel we should emphasize that we have listened and redesigned (where practical and possible) to reflect the feedback from ADC.

- Relocation of new side entrance ramp - we have adapted our design following the feedback from ADC, and we are now looking to celebrate to a greater degree, the railway carriage and its features. Also, tying in with the point on biodiversity, we will position the ramp to avoid the removal of an established small tree.
- The anchor point has been marginally relocated and will now be part of the tidal defence barrier with slot-in storm boards.

4.3. The proposals that form the basis of this pre-application enquiry are set out below, and expressed as Stages 1-4 (Phase 1).

Development proposal (Stages 1-4):

Stage 1A – Boat ramp improvements

- i. Concrete anchor point – all works at or below ground level
- ii. Snatch block on chain will improve the effectiveness and efficiency of the current winch equipment
- iii. Wheel chocks to assist holding of craft when using the slipway and to prevent 'runaway'
- iv. Additional beach matting – temporary and moveable for launch and retrieval purposes



Photo 3 – View from beach towards west side slipway

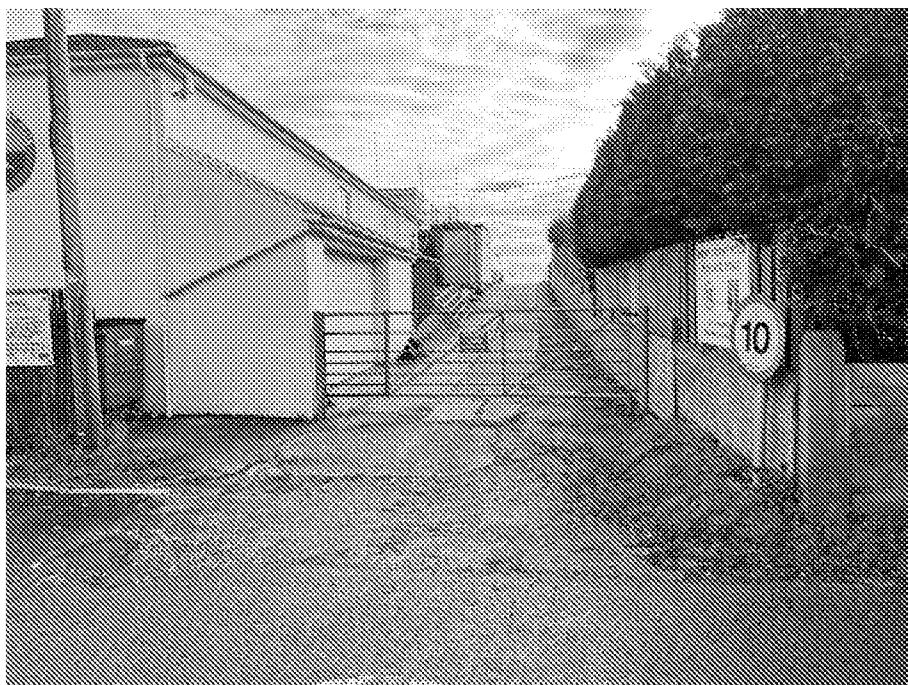


Photo 4 – Front view of slipway from West Front Road

Stage 1B – Solar Panels (excluding batteries)

- v. A total of 61 solar panels positioned on the north-east and south-west existing roof slopes
- vi. The solar panels would have the capability to generate 22267 kwh per year initially, degrading over time. Over a 25 year term, the solar panels would be expected to generate 523209 kwh of which 470888 will be consumed on site and 52321 kwh would be exported
- vii. The question as to whether the solar panels would be 'development' requiring planning permission is unclear. Having noted the Planning Portal advice, it seems solar panels mounted on a non-domestic building can be permitted development. There are other conditions for this to be the case. Pagham Yacht Club:
 - is not a listed building or within the grounds of a listed building, nor on a site designated as a scheduled monument, or situated on designated land
 - the proposed solar panels have been positioned in the optimum functional position for the Club, minimising the effect on the external appearance of the building and the amenity of the area
 - minimising glint or glare
 - the site is not within 3kms of an airport or aerodrome
 - they would project no more than 200mm from the roof slope, not be within one metre of the external edge of the roof, not be within one metre of a junction of that wall with another wall or with the roof of the building



Photo 5 – Aerial view to show roof where solar panels will be positioned



Photo 6 – View of building rear from the beach

Stage 2A - Alterations to provide a new side entrance

- viii. Construction of a ramp combined with a raised wall and railings for safety where necessary. It would be constructed with a concrete plinth and metal ramp, between the new door and the higher end of the verge next to the footpath. In terms of levels this would be the optimum position for a ramp
- ix. An existing 'ready-made' porch with overhang would provide protection from adverse weather conditions
- x. Create an internal entrance foyer with double doors, keeping the current external pillar
- xi. Break through the original side wall of the former railway carriage and incorporate a separate new entrance,
- xii. This aspect of the proposed works would:
 - ❖ protect children and make a more secure and supervised series of entry points
 - ❖ reduce walking distance for some members and allow members to not walk through main Club and bar area in wet clothes when accessing the changing rooms and toilets
 - ❖ enhance fire escape in emergency circumstances
 - ❖ it would be more energy efficient
 - ❖ have the potential to reduce noise
 - ❖ the side entrance would support an improved internal layout



Photo 7 – Public Footpath to east side of Pagham Yacht Club



Photo 8 – Position of new entrance from footpath

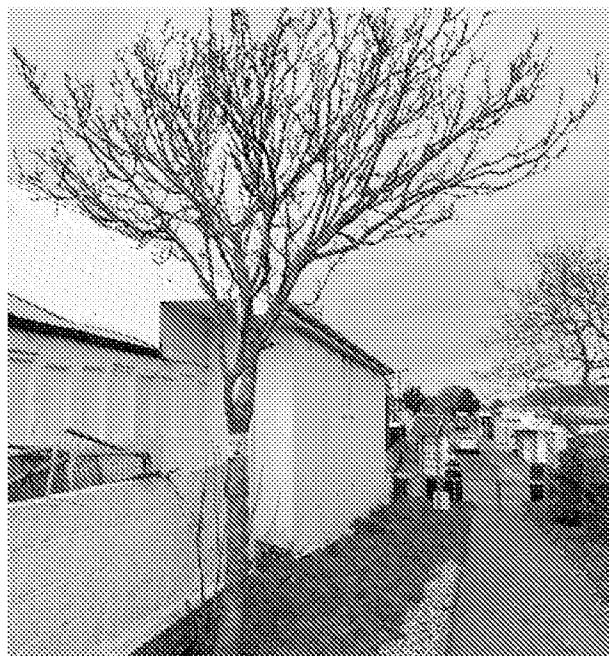


Photo 9 – Combined view of footpath and entrance looking north

Stage 2B – Boundaries, gates, bike store shed with secure access

- xiii. The bike store would be a secure bike compound made from timber, flat felt roofed and open sided on two sides. Boundaries would be a solid blockwork wall, rendered white, to a height of 2m with decorative anti-climb 'crestings' on top of wall
- xiv. A coded gate would face West Front Road and provide access to the proposed bike store
- xv. The effect of the front wall, together with the existing side wall, would be to establish a more secure area for bikes and to also the pedestrian access point to the sail room and rib store. This is in line with PYC ethos to encourage members to cycle where currently they may drive, for lack of secure cycle storage. The bikes in the store would be protected from the elements.
- xvi. Soft landscaping would be positioned to the West Front Road side of the frontage wall



Photo 10 – Front view of existing entrance and forecourt

Stage 3A – Beach Elevation Facade

- xvii. The beach entrance door and elevation comprising a wall, surmounted by windows would be replaced with sliding doors and cladding to the walls. The sliding doors would allow indoors to embrace the amazing outdoor views of the sea and the activities on the water generally
- xviii. The cladding will be cedar or similar wood, possibly artificial wood effect
- xix. One meter from the front elevation there will be a tidal defence barrier with slot-in storm boards to a height of approximately 0.5m together with planters and piers to break up wave actions that might threaten the fabric of the building. The anchor point would be incorporated into the wall.
- xx. Cladding for the bridge will be the same as would be used for the ground floor elevation. There will also be an alteration to the side bridge window to ensure safer and unobstructed observation of on-water activities due in part to the changed beach conditions through shifting of sand bars



Photo 11 – Rear view of building

Stage 3B – Internal Alterations and Improvements

- xxi. Part of an internal wall would be altered between the 'snug' and the flat roofed existing rear extension, to create an internal opening to enhance views from within the building towards the sea

Stage 3C – Internal Alterations and Improvements - Side Store Alteration Works

- xxii. An existing external store, forming part of the existing single storey rear extension, would be incorporated into the main social area through the removal of an internal wall, to increase the Clubhouse internal floorspace

Stage 4A – Internal Alterations and Improvements - Sail Loft conversion to Female Changing Rooms and Toilets

- xxiii. An existing multi-functional space situated above the rib store, at the West Front Road end of the building, was originally specified as a sail loft store room in 2005 when that extension was added. It would be converted to a larger and improved ladies toilets and changing rooms to reflect the needs of a growing number of female members.

Stage 4B – Internal Alterations and Improvements - Conversion of Existing Female Facilities into Function Room

xxiv. The previous space, used as the ladies toilets and changing rooms would become a new multi-functional room, for meetings and would be a safer youth room, less remote from the main activity area in the Clubhouse and more easily supervised.

Other aspects of the facilities and proposals:

xxv. The Club has on-site waste management facilities. These are located adjacent to West Front Road at the western end of the frontage. In that it is not anticipated that the proposed alterations and additions will give rise to a change in membership numbers, these waste provisions will not be increased and present arrangements will remain unchanged.

xxvi. The Club emergency escape arrangements will remain the same but with the addition of the new side entrance/exit.

5. Relevant Planning Policies and Guidance

5.1. The main planning considerations are addressed below in the context of the 12th December 2024 National Planning Policy Framework (NPPF), the Arun Local Plan 2011-2031 adopted on 18 July 2018, the South Inshore and South Off Shore Marine Plan July 2018 and 2021 Small Sites Design Guide SPD. Principles of Development, the Pagham Parish Council's Village Design Statement by Pagham PC (PDS) and Supplementary Planning Guidance.

5.2. The NPPF applies a presumption in favour of sustainable development. NPPF Paragraph 39 confirms that local planning authorities should approach decisions on proposed development in a positive and creative way, work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

5.3. Paragraph 88(d) of NPPF points to planning decisions that should enable the development of accessible local services and community facilities such as sports venues and open space. Paragraph 96(c) adds, when referring to the decision making process, it should aim to achieve healthy places by providing sports facilities. The theme continues at Paragraph 97 (NPPF) which states that to provide the social, recreational and cultural facilities and services that the community needs, planning decisions should (a) plan positively for the provision of sports venues and open space, (d) ensure that established facilities are able to develop and modernise and are retained for the benefit of the community.

5.4. At the pre-application stage of our engagement, ADC Planning indicated that the works towards "...the upgrade of the yacht club will contribute towards encouraging health and wellbeing whilst ensuring the site is accessible to all residents and visitors.....this will maximise the impact the yacht club could have in the community. The proposal would accord with Policy HWB SP1 of the ALP."

Arun Local Plan 2011-2031

5.5. The main Local Plan policies of relevance are:

- Policy TOU SP1 - Sustainable tourism and the visitor economy
- Policy TOU DM1 - Tourism related development
- Policy D SP1 Design
- Policy D DM1 Aspects of form and design quality
- Policy D DM4 – Extensions and Alterations to Existing Buildings
- Policy EEC SP1 – Adapting to Climate Change
- Policy ECC SP2 - Energy and climate change mitigation
- Policy HWB SP1 - Health & Wellbeing

Policy HER DM4 - Areas of Character
 Policy ENV DM2 - Pagham Harbour
 Policy ENV DM3 - Biodiversity Opportunity Areas Development
 Policy ENV DM5 - Development and biodiversity Development
 Policy W SP1 – Water
 Policy W DM2 - Flood risk
 Policy W DM3 - Sustainable Urban Drainage Systems
 Policy W DM4 - Coastal protection
 Policy WM DM1 - Waste Management
 Policy QE DM2 - Light pollution

South Inshore and South Off Shore Marine Plan July 2018

5.6. The main policies of the Marine Plan are:

MPSACC1 South Marine Plan Policy S-ACC-1; MPSACC2 South Marine Plan Policy S-ACC-2; MPSB101 South Marine Plan Policy S-BIO-1; MPSB102 South Marine Plan Policy S-BIO-2; MPSCC1 South Marine Plan Policy S-CC-1; MPSCC2 South Marine Plan Policy S-CC-2; MPSCC3 South Marine Plan Policy S-CC-3; MPSCO1 South Marine Plan Policy S-CO-1; MPSDIST1 South Marine Plan Policy S-DIST-1; MPSEMP1 South Marine Plan Policy S-EMP-1; MPSTR1 South Marine Plan Policy S-TR-1; MPSTR2 South Marine Plan Policy S-TR-2

The Pagham Village Plan

5.7. The Village Design Statement is partly derived from the version contained within the Pagham Parish Plan published in 2004. It is intended as a document to be adopted by Arun District Council to be used as a material consideration when deciding planning applications, and to provide guidance to residents on whether proposed extensions are likely to be acceptable. It may also be used voluntarily by residents when planning the many alterations for which formal permission is not required, as a guide to the likely opinions of their neighbours.

5.8. Under “The Beach Estate - Development Criteria” – it states that “Front boundaries should contribute to overall street scene” and also that an objective is to “Retain trees and hedges where possible”.

5.9. “GENERAL CONSERVATION POLICIES” says “Pagham Parish Council will seek actively to promote the protection of buildings, structures within the parish in accordance with national and locally-generated guidelines and adopted policies.....”. Furthermore that “Pagham Parish Council will alsoSecure retention and promote community use of privately owned space, particularly where identified facilities or previous public access and recreational use has prevailed over a significant period of time.....”

6. Planning Assessment of the Proposals

6.1. Earlier in Sections 1 and 4 (Introducing Pagham Yacht Club and Proposals) the Club has mentioned the ADC pre-application advice and has set out the subsequent changes made to the proposals that have helped improve the development and which are now compliant with policy. What follows, are the ‘considerations’, with the headings taken from the pre-application letter, how the feedback has been addressed set against the relevant national, regional and local policies and why Pagham Yacht Club feel the planning application should be supported.

6.2. We are keen that the background should not be lost. We are volunteer and community based, non-profit making Club, very keen to facilitate health and well being as part of our ethos and for the benefit of our members and supporters. The Club does not aim to increase membership, but instead to improve our dated facilities to make the Club’s activities safer, more comfortable and more welcoming for our members and a diverse local community that

supports us. The Club is well established, now sixty years old, but needs to update its facilities.

Principle of the Development

- 6.3. Due weight should be given to the NPPF suggested presumption in favour of sustainable development, that “...local planning authorities should approach decisions on proposed development in a positive and creative way, work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”
- 6.4. Similarly, the NPPF is positive about the “....development of accessible local services and community facilities such as sports venues and open space.” The document “...refers to an aim “..... to achieve healthy places by providing sports facilities.....” and also to “...provide the social, recreational and cultural facilities and services that the community needs..... {and}ensure that established facilities are able to develop and modernise and are retained for the benefit of the community.”
- 6.5. In terms of the Local Plan, Policy TOU SP1 - Sustainable tourism and the visitor economy – the PYC proposal will support sustainable tourism in that an improved Club facility would build on current links with tourist locations, such as Church Farm Holiday Park in Pagham, and local B&B’s and AirB&B’s, from where lots of our members have originated having visited Pagham. Improved facilities would encourage long-term visitor interest and activity, would help support a viable visitor economy, provides benefit to local people and businesses and it could help extend the visitor season.
- 6.6. Policy TOU DM1 - Tourism related development – the development proposals would strengthen local visitor attractions, facilities and accommodation. If past experiences are anything to go by, the development proposals, could attract visitors to the location through its ‘try-sail’ and ‘Paddlers’ options that would be open to visitors and non-members in the area.
- 6.7. The Pagham Village Plan is similarly supportive where it says “Pagham Parish Council will alsoSecure retention and promote community use of privately owned space, particularly where identified facilities or previous public access and recreational use has prevailed over a significant period of time.....”
- 6.8. Pagham Yacht Club welcome the pre-application stance from ADC Planning where it was stated “....the upgrade of the yacht club will contribute towards encouraging health and wellbeing whilst ensuring the site is accessible to all residents and visitors.....this will maximise the impact the yacht club could have in the community. The proposal would accord with Policy HWB SP1 of the ALP.”

Marine Plan

- 6.9. In that the site is immediately adjacent to the foreshore, ADC have advised at pre-application stage, the “.....relevant policies of the Marine Plan generally require that impacts on the marine environment are avoided, minimised, or mitigated.....” These three objectives are in order of preference. ADC advise that the “.....relevant Marine Plan policies to this location seek to minimise greenhouse gas emissions, ensure that development adapts to impacts arising from climate change (flood risk and coastal change), ensure uses coexist with each other, protect and enhance biodiversity and demonstrate they will avoid, minimise harm to the seascape.....” From their assessment of the pre-application submission ADC concluded that “The analysis in the rest of this report demonstrates that there is no conflict with these policies.”
- 6.10. The South Inshore and South Off Shore Marine Plan 2018 document reinforces Local Plan policies, mainly Policies EEC SP1 and W DM4.
- 6.11. The Club premises are located adjacent to the foreshore. In that the Club has been sailing since 1963 at Pagham and for 50 years from the current premises, our activities have been

well established for many years. By the nature of our activities, mainly on-water, impact on the marine environment can arise and has done so for many years. Nevertheless, the Club recognises the importance of its relationship with the sea and with marine life. We understand it is in our interests to avoid, minimise and mitigate any on-water activity impacts where these might arise. Like other similar Clubs taking part in similar activities, nationwide, it is a difficult relationship, but one that can and has been managed.

6.12. Whilst the Club do not have a formal Marine Plan, our policies and the way we operate are mindful of the importance of the marine environment through the following Club actions:

- ✓ For on-water safety the Club have a used a rib and a jet-ski to oversee those occasions when we are on the water, but we have prevented the launch of other private jet-ski's at the Club
- ✓ minimize greenhouse gas emissions
- ✓ the proposals ensure that the Club adapts to impacts arising from climate change (for example, flood risk and coastal change)
- ✓ take measures to protect and enhance biodiversity, ensure members are aware of the need to coexist with and avoid harm to the seascape
- ✓ The Club has demonstrated its environmental credentials through its proposals to encourage cycling and through its ambitions to install solar panels.
- ✓ the Club is also part of the Royal Yacht Association Green Blue – Making the Environment Second Nature programme. For example, through the 'use of oils and fuels', cleaning of boats, embracing anti-fouling, watching our waste, using resources sustainably, discharge of sewage, controlling noise and fumes, avoiding spreading invasive non-native species and appreciating wildlife.
- ✓ Our Youth Members often clear the public footpath and the viewing platform to the side and rear of the Club

6.13. The Royal Yacht Association (RYA) supports the production of Marine Plans that aim to ensure a sustainable future for our coastal and offshore waters and at the same time where they acknowledge and balance the many activities, such as recreational boating, in our marine environment. A successful Marine Plan will do both.

6.14. Other similar Clubs in the area, such as Worthing, Felpham and Chichester, are similarly improving their member experience by upgrading their facilities, through re-building, extending or altering their facilities, to enhance the member experience.

6.15. In conclusion, Pagham Yacht Club recognise that Club activities can have small impacts on the marine environment, but the proposed works will not change our level of activity, they simply improve the current member experience. Furthermore, marine impact needs to be balanced with the health and wellbeing benefits, together with the social and community opportunities.

6.16. The Club feels that as a result of the proposed works, nothing will change in terms of our on-water activities, and that therefore there will not be a need for a formal Marine Plan. If it is deemed that a formal Marine Plan is required as part of the planning process, the Club would be happy to accept a 'planning condition' whereby, prior to commencement of the development, we put in hand the preparation of a more comprehensive Marine Plan.

Coastal Protection

6.17. In terms of ADC coastal protection policies, Policy W DM4 permits development in coastal areas providing they protect and enhance coastal habitat such as vegetated shingle.

6.18. At the pre-application stage, the ADC response pointed out that: "... On the 6 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. The CCMA highlighted that Pagham is a dynamic area, and that all

development should be considered with this in mind i.e., there can be no guarantee that development situated next to the sea is 100% safe.”

6.19. ADC continued: “... The proposal is for alterations to the existing club house; it is accepted that the development would not conflict with {Policy} W DM4”.

6.20. In that there is a 5m patio between the PYC premises and the beach shingle, the beach vegetation will not be affected by the proposed minor alterations and additions and as a result the beach coastal habitat will not be affected by the proposals. If necessary, the Club would accept a planning condition to facilitate a works management plan during the construction period.

6.21. The Club have adapted to the changing beach conditions that we have all been experiencing and have a well trained and experienced on-water team to ensure coastal conditions are understood ahead of any decisions to undertake on-water activities. Furthermore, the proposed works seek to improve the facilities for members rather than to expand membership numbers and therefore the intensity of activities at the premises remain much the same.

6.22. ADC referred to Policy ECC SP1 of the Local Plan which states: “.... the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness of biodiversity. To achieve this, development must be designed to take account of, among other things, location.

6.23. The site is within Coastal Change Management Area. The development has been assessed against the interim framework and this application falls into category 4 (reconstruction). At the pre-application stage ADC concluded that the “....Development in the zone is permittable and should aim to raise floor levels where possible.”

6.24. Compliance with Policy ECC SP1 will be subject to the specific details submitted to accompany an application. The layout of the building, floor levels and resilience of the proposed construction are key considerations in this instance. An Erosion Risk Statement is required to accompany any application.

6.25. In terms of an Erosion Risk Statement and the suggested raising of floor levels, the Club respectfully requests that the following be taken into account:

- ✓ The proposed works amount to minor external alterations, a front cycle store addition and internal alterations
- ✓ in that the floor level of the Club building is fixed, the Club cannot raise the floor of the premises without impact on ceiling heights, the on-water observation bridge and the overall height of the building
- ✓ raising the floor level would affect, internal movement, foundations, essential services such as plumbing, ventilation and electrics, as well as door and window heights
- ✓ raising the floor level would also harm the heritage of the part of the building comprising the railway carriages
- ✓ raising the floor levels would be prohibitive given the minor nature of the proposed works, and disproportionate in the context of the current proposal
- ✓ over recent years, the Club have regularly adapted to the ever changing coastal conditions and in recognition of the location of the building, part of the proposal includes a protective defence wall incorporated into the beach elevation part of the design
- ✓ many years ago the Club introduced winches for the safe launch and retrieval of boats
- ✓ the slipway to the west and the footpath to the east of the Club building would be the route for water overspill in the event of a tidal surge. By the nature of the original construction of the building, the beach front section is already raised above shingle level.

6.26. Whilst it is understood why in other circumstances, such as the erection of a new house, there would be a need for a full Erosion Risk Statement, given the nature of this minor proposal, which itself brings many benefits, the Club feels the proposed development would not conflict with Policies ECC SP1 and W DM4.

Area of Character

6.27. The property is in an Area of Character. At the pre-application stage ADC indicated that the listing notes for this Area of Character include “..... Pagham Beach Estate derives from the distinctive scale and height of the residential buildings (single storey, majority with no accommodation in the roofs)....” It records that the area has a mixed quality of design and that “....The retention of buildings and other features such as boundary walls, hedges, trees, railings, open spaces, etc. which make positive contributions to the special character of the areas....” The original sections of the Beach Estate take its character from the historic holiday chalets and railway carriages. A high proportion of the carriages are still visible, many have been encased by later structures but still retain evidence of original features, such as windows. The Yacht Club is mentioned as having a distinctive presence in the area.

6.28. The application site premises were originally a bungalow, comprising two railway carriages perpendicular to the beach and with a single storey roof structure linking the two carriages. Pagham Yacht Club acquired the premises in the mid-1970's and since then a number of additions and alterations have been carried out to facilitate the Club activities. The additions comprise a flat roof extension fronting the beach, with bridge above for observation and sailing safety purposes, built in 1978, and a more substantial extension fronting West Front Road, that introduced, a kitchen, better toilet and changing facilities, a sail-loft on the upper floor and support vessel room below, all carried out in 2005.

6.29. The ADC Planning pre-application response indicated that “....In terms of potential harm to the Area of Character, the alterations proposed to the railway carriage for the inclusion of the new side access and alterations to the front boundary are of most concern. The side access ramp will require a small loss of a defining feature of one of the two railway carriages.

6.30. The Club has responded to this concern as can be seen from the revised drawings. The changes to provide a new entrance to the side, have been kept to a minimum, with the configuration of the access ramp and door entry reduced in scale. As part of our amendments package, the Club also proposes to introduce a story board, inside and outside the Club, the latter in view of the footpath, celebrating the history of the carriages. Internally, the Club has already exposed parts of the carriage, previously hidden, to once again help celebrate the history of the structure. The story boards will in part be based on the investigatory work we have undertaken to find out about the age and design of the carriages. We have managed to find copies of the original drawings of the carriages used for their building. The Club could also paint the carriages, similar to the original colour, and take measures to restore the original windows.

6.31. The pre-application advice also referred to the front boundary works fronting West Front Road saying: “.....to raise the front boundary wall and install anti climb crestings would introduce a high boundary feature in an area where this type of development is uncommon.” The advice also says: “It is acknowledged that the Yacht Club and a neighbouring garage directly front the highway, as such built form above approx. 1m is present in this immediate section of road. The description states this wall would be between 2-2.5m high. 2.5m would be significantly high and has the potential to be a dominant feature, it is recommended that nothing above 2m is proposed. Part H of the ADG requires that community and leisure facilities be welcoming, designed positively and clearly defined. Implementation of new boundary treatments and security features may have the opposite effect, care should be taken not to make the Yacht Club unwelcoming.”

6.32. West Front Road and East Front Road are both varied in terms of the scale of buildings, gates and other means of enclosure. There are many structures that exceed 2m in height and nearby at Nos 2, 12-16 (EFR) and 11 (WFR) there are garages, fronting onto the respective roads of around 2.5m in height. Therefore, structures fronting these two roads are common within the vicinity of the application site. However, in recognition of the pre-

application comments, the Club have amended this aspect of the scheme and reduced the height of the wall from 2-2.5m down to 2m, as suggested, which it is felt achieves a better balance with existing nearby structures and the re-design has included the introduction of soft landscaping to help reduce any impact that might arise.

- 6.33. The Club are very keen to portray a welcoming appearance in line with our community based ethos. We believe the introduction of a better placed main entrance to the side of the building, the importance of a larger and more sustainable cycle storage provision and a more accessible step free access, would be more in keeping with the street scene. These improvements would be welcoming, designed positively and clearly defined as required by Part H of the Arun District Guidance.
- 6.34. In the Pagham Parish Council's Village Design Statement, under "The Beach Estate - Development Criteria" – it states that "Front boundaries should contribute to overall street scene" and also that an objective is to "Retain trees and hedges where possible". The Section covering "GENERAL CONSERVATION POLICIES" says "Pagham Parish Council will seek actively to promote the protection of buildings, structures within the parish in accordance with national and locally-generated guidelines and adopted policies.....". Furthermore that "Pagham Parish Council will alsoSecure retention and promote community use of privately owned space, particularly where identified facilities or previous public access and recreational use has prevailed over a significant period of time....."
- 6.35. Pagham Yacht Club feel the proposals are an investment in the building and it's heritage, would not result in the removal of trees and that the finished building would be a visual asset to the Beach Estate.

Character and Appearance

- 6.36. In regard to Character and Appearance the ADC pre-application response summarised the relevant policies. Policy D DM1 sets out 13 design aspects to be taken into account when processing planning applications. The main relevant criteria are "Character, Appearance, Impact, Innovation, Adaptability, Crime Prevention, Public Realm and Scale". Policy D DM4 sets out the criteria to be assessed in regard to extensions and alterations of existing buildings. They generally seek to minimise the impact of the proposal on the character of the host dwelling, its neighbours and the locality.
- 6.37. At pre-application stage, ADC advised that ".....Very few details of the appearance of the proposal have been provided. It is understood 61 solar panels are proposed to the roof, a new boundary treatment and bike store are proposed to the front elevation, alterations and inclusion a of side access ramp to the building and alterations to the fenestration and material finish to the rear section of the building. Other alterations are proposed, these are either minor in scale or will not be visible from the wider area."
- 6.38. The current application now includes the details requested, and has incorporated amendments, along the lines suggested by ADC, and it is felt that these improvements now overcome previous concerns.
- 6.39. At the time of the pre-application meeting with ADC, it was unclear whether, or not, the proposed works to remove the beach elevation windows and to replace these with sliding doors would amount to development requiring planning permission. They could amount to a 'material alteration to the external appearance of the building' but the use of the premises as a sports club complicates this aspect of the definition of development. There might be permitted development rights for leisure buildings. Nonetheless, given the uncertainty, the Club have decided to include this aspect of the works as part of the planning application submission.
- 6.40. At pre-application stage the ADC response indicated that ".....the alterations to the rear section of building include enlarging openings in the rear elevation would be seen in a positive light and will improve the appearance of the building. Timber effect cladding can be found elsewhere on the beach albeit it predominantly painted. Elevations with a significant proportion of glazing can also be seen, including the immediate neighbour to the south-west. The improvements are subservient to the building as a whole and sympathetic to the area."

The ADC comments are welcome, but it is also worth noting that the rear part of the building, incorporating the flat roof, is not original, does not include the carriages, and was added in 1978.

- 6.41. When referring to the proposed solar panels, at pre-application stage, ADC indicated that “....Solar panels to the roof will not be visible from street level adjacent to the building. Glimpses of them may be achievable from a distance. Despite not being well-integrated as an alien feature to the building, they are subservient in scale to the host and discreetly located as to not harm the character of the area or be overly dominant on the host building.”
- 6.42. Moving on to the new access ramp, ADC have advised that “.....The access ramp would be small in scale and subservient to the building. It appears to be outside of the extents of land ownership. This may have implications to the access footpath to the side of the building. If the access ramp does fall outside of the club's ownership the correct certificate will need to be completed when submitting an application, with the landowner informed of the application.” The comments are helpful and so the Club have had discussions with Pagham Parish Council representatives, they have indicated their support for the proposal, in principle, and the applicant has served notice through Certificate B as part of the application submission.
- 6.43. When summing up character and appearance at pre-application stage ADC responded “..... These improvements do not harm the character of the area and are subservient and well integrated with the host building and surrounding area. The proposal accords with policies D DM1 and D DM4.”

Residential Amenity

- 6.44. At the pre-application stage ADC referred to Policy QE SP1 of the ALP which requires development to generally “....seek to minimise the impact of the proposal on the character of the area and its neighbours and enhance the quality of its environment.”
- 6.45. Policy QE DM1 states that new noise generating development should be supported by an appropriate noise assessment detailing the existing noise environment, and the likely impact of the development and evidence to show that it will not negatively impact noise sensitive environments. From the pre-application response it was felt that whilst this existing Club facility is located amongst residential dwellings “...., it is not expected that there will be any additional impact arising from noise pollution.”
- 6.46. The pre-application continued “It is presumed that works to the southern section of the building, boat ramp improvements, new anchor point and solar panels will not increase the bulk and or scale of development significantly and will not be overbearing or have an over shadowing effect on neighbours.”
- 6.47. The works to the front of the building including the new boundary treatment would be unlikely to impact neighbouring residents. The new side access works to the eastern elevation of the building would not be noise generating in themselves. The use of the Club for on-water sports activity and social events are existing activities. The hours and days of opening will not change as a result of the application proposals.
- 6.48. In between the Club and its nearest neighbour there lies a Public Footpath and the nearest part of 2 East Front Road (2EFR) is a garage. The Public Footpath is very well used, in that it is the main access point to the beach in this part of Pagham. The side wall of the main part of 2 East Front Road lies to the east side of the garage. ADC Planning considered the new entrance alterations would be “....of a scale typical of other similar features”. Having regard to the separation between Pagham Yacht Club and the neighbour to the east and because the neighbour's garage is between the Club and the habitable part of 2 East Front Road, at the pre-application stage ADC concluded that “....no overbearing or overshadowing impacts should arise”.
- 6.49. The ADC pre-application response also stated: “The access ramp is appropriately scaled and a subservient feature, it will not cause any overbearing or overshadowing impacts. It is not known exactly where the existing club's main entrance is, care should be taken not to create

a new main entrance without consideration being given to potential noise impacts from use of the side entrance and the neighbour to the east, as the properties main accommodation is located directly opposite this area.”

6.50. The proposed new side entrance adds to the existing access points, front and rear, and it is likely that the preferred access point will be from the beach at the rear, which particularly in the summer months, when the Club is at its busiest, is currently the favoured entrance and exit point.

6.51. The Club must weigh its management responsibilities, including safety issues, level access, and the opportunity to create a safe and secure cycle shelter, and environmental improvements, with possible effects on neighbours. The Club already have measures in place in the event that there were to be an issue and will be updating its Noise Management Plan to address noise mitigation, communication, and actions as and when these might be required.

6.52. With regard to alterations to the fenestration to the southern elevation of the building, the size and number of windows will change. The pre-application response acknowledges that “...no side facing opening proposed. Windows located to the first floor will change in configuration, but the opening size will remain the same.” The Club have pro-actively tried to minimise alterations where changes might give rise to overlooking. The ‘bridge’ presents a slight problem in that 180 degree sight lines are necessary for the safety and observation of sailors and others on the water. This is mostly used on sailing days at the weekend when conditions allow. The side windows are similar to those existing and overlook the sea and foreshore, in front of the adjoining dwellings. ADC indicated that “All windows will achieve views across the foreshore to the south, the neighbours will not experience a loss of privacy.”

6.53. The ADC pre-application response stated “....Noise impacts will need to be considered when preparing an application, this may require further explanation as to the expected use/frequency of use, of the function room/side entrance. Otherwise, the proposal is not expected to have any adversely negative impacts from being overbearing or overshadowing or overlooking of neighbouring properties. It is expected to comply with policies D DM1, D DM4, QE SP1 and QE DM1 of the ALP.”

6.54. In terms of there being noise impact arising as a result of the new side entrance, the Club:

- It is not anticipated that the proposed alterations and improvements will give rise to an increase in membership numbers
- The activities will remain the same as they are at present
- The hours of use and the pattern of days when the Club is in use will remain as existing and set out in paragraph 1.6 above
- The Club takes seriously its role as a good neighbour and has a noise management plan in place, which is currently being reviewed

6.55. Whilst it is not anticipated that the Club improvements will result in an increase in Club membership, or additional noise impact, the alterations have been carefully designed, improve the quality of the Club and community experience, and the noise management plan is there to record and address any noise incidents that might arise.

Biodiversity

6.56. Schedule 14 of the Environment Act 2021 introduces Schedule 7A to Town and Country Planning Act 1990 to ensure that most developments deliver a 10% Biodiversity Net Gain (BNG) to provide more or better quality natural habitats than there was before. Applicable developments will normally be subject to the national bio-diversity net gain condition to secure the 10% increase.

6.57. There are certain developments that are exempt from BNG rules. This includes development that does not impact on any on-site priority habitat and impacts less than 25 square metres

of on-site habitat with a biodiversity value greater than zero, or 5 metres of on-site linear habitats such as hedgerows.

6.58. Policy ENV DM5 seeks to achieve a biodiversity 'net gain' and protect existing habitats on site. This can be achieved through incorporation of biodiversity elements such as green walls, bird/bat boxes or other mitigation measures into the landscape. The Environment Act requires a 'measurable 10% net gain' in biodiversity.

6.59. In terms of designations and constraints Pagham Yacht Club is situated within or immediately adjacent to the Pagham Harbour Special Protection Area (SPA), a Site of Special Scientific Interest (SSSI) and a Site of Local Importance to Nature Conservation (SLINC). At pre-application stage ADC indicated that "...the proposal is adjacent to designated sites the statutory metric will be required to show that a 10% net gain can be achieved."

6.60. Local Plan Policy ENV DM3 - Biodiversity Opportunity Areas requires that: "Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA."

6.61. The footprint of the Club building, together with hard surfacing, around the external area, within the application site, leave very little open space, and there is certainly precious little vegetation within the defined site. With the exception of one self-sown shrub, no other vegetation will be removed as a result of the proposed alterations and additions.

6.62. The self-sown shrub would need to be removed due to the location of the side entrance, but also because of its proximity to the foundations of the building. The loss will be mitigated through new planting and bird or bat boxes.



Photo 12 – Self-sown sapling abutting the building on east side

6.63. The following are the opportunities to meet the 10% bio-diversity net gain requirement:

- The frontage area to West Front Road – this provides the opportunity to provide a green wall or trellis fixed road side of the new frontage wall (planted with indigenous species to be agreed)
- The space between the Club building and the public footpath to the east side of the site –

most of this is owned by Pagham Parish Council (PPC). This has been discussed with PPC and have agreed in principle and welcome the opportunity for the Club to plant suitable species in this area, subject to prior dialogue with a specialist advisor

- The west elevation external walls are the quietest part of the premises and offer the opportunity for bug houses, bird and bat boxes
- In that the Club have a lease on the boat and car park 100m from the site (shown as blue land on the site plan, we are 'owners' (within the meaning of the Act) and therefore have some control over that area. This is a large open area on which a biodiversity gain would be a realistic opportunity to introduce indigenous planting and to enhance habitat of species already in that area. If needed the Club would be happy to accept a planning condition that requires a detailed provision and management plan for biodiversity. The 'childing pink' (an endangered plant) already has a presence in the car/boat park

6.64. In regard to national advice on biodiversity gain, when referring to de minimis exemption, it states:

"The de minimis exemption only applies to development if the following two conditions are met:

- *the development must not impact on any onsite priority habitat; and*
- *if there is an impact on other onsite habitat, that impact must be on less than 25 square metres (e.g. less than a 5m by 5m square) of onsite habitat with a biodiversity value greater than zero and on less than 5 metres of onsite linear habitat (such as a hedgerow)*

Onsite habitat is impacted by the development if it is lost or degraded such that there is a decrease in the biodiversity value of that habitat (as determined by the statutory biodiversity metric). A decrease in biodiversity value occurs where there is a change in habitat type, extent, or condition which results in a negative unit score. A priority habitat is a habitat listed by the Secretary of State for Environment, Food and Rural Affairs under section 41 of the Natural Environment and Rural Communities Act 2006.

The exemption is designed to cover planning permissions for:

- *Development which only impacts on onsite habitat with a biodiversity value of zero so no gain would be required if there was no exemption;*
- *Developments where there is only a de minimis impact on other onsite habitat to ensure biodiversity net gain is applied proportionally;*
- *Minor development in established areas of habitat where the development would have less than 25 square metres (or less than 5 metres for linear habitat) impact on this habitat (unless priority habitat); and*
- *Change of uses to development where there is no or only a de minimis impact on onsite habitat.*

An applicant, if they consider their development proposal would be within the scope of the de minimis exemption, must state in their planning application form that they consider the proposal to be subject to the de minimis exemption and provide reasons for this."

6.65. Given the minor nature of the proposed works, the paucity of vegetation already present within the red lined application site, and the single shrub that will be affected by the proposed works, The Club feels that there is a case for exemption from the 10% biodiversity net gain policy. However, as stated, there are very good opportunities to more than meet the 10% biodiversity gain and the Club are committed to this cause.

6.66. If, however, ADC feel it necessary, Pagham Yacht Club would accept a standard planning condition, together with a new planting condition to ensure that a biodiversity gain at the site would be achieved. To conclude, the Club feels that this approach meets the policy requirements of the local plan.

Impact on the Pagham Harbour Special Protection Area

6.67. In terms of the impact of the development on the Pagham Harbour Special Protection Area it is noted that the site is within Zone A (0 - 400m from the site boundary). At pre-application stage, the ADC response referred to Policy ENV DM2 which indicates that “.... development will only be permitted in exceptional circumstances where the development is able to demonstrate there will be no detrimental effect on the Pagham Harbour, including non-native species and the water environment.” Policy ENV DM1(a) sets out the requirements. ADC continue: “The development may result in additional recreational pressures on the adjacent SPA should the club seek to expand operations because of the alterations. Further details would be required in this regard. The development should ensure that there are no adverse impacts to the integrity of an Internationally Important Site for Nature Conservation in order to comply with ENV DM1 and in turn comply with Policy ENV DM2.”

6.68. The new cycle store introduces a very small additional amount of floorspace. The aim of the Club is not to increase membership, but instead to improve our dated facilities that will make the Club’s activities safer, more comfortable and welcoming for our members and for the diverse local community that support us. Our membership fluctuates year on year, with a churn of numbers down each year, but new members joining to supplement our numbers. Thankfully, those new members are often families wanting to embrace outdoor life and in so doing, to improve their health and well-being.

6.69. The Club is well established in Pagham, now sixty years old, but needs to update its facilities. The proposed works will:

- Improve accessibility for people with mobility issues, improve security especially for children and encourage improvements to member health and well being
- Improve the premises because they have not been updated much in the last 30 years and need modernising,
- The improved facilities will be more focussed on family membership and our community partners
- The Club needs to respond to modern day on-water trends that our members are asking for, but at the same time must remember the core sports of sailing and fishing
- Enhance our ‘green’ footprint and bring down running costs

6.70. In terms of impact on Pagham Harbour Special Protection Area, given that the proposed works are not aimed at a membership increase, we do not anticipate any real change in the amount of on-water activity. As a responsible Club mindful of our environmental responsibilities, we will continue to:

- Encourage our members to undertake beach ‘litter pick’ sessions
- Embrace new planting opportunities in association with specialist advice
- Clear the footpath and platform of shingle for the benefit of all users
- Continue to embrace the Royal Yacht Association ‘Green and Blue’ campaign of which we are members
- Members are not allowed to enter Pagham Harbour
- Whilst not part of the application site, but nevertheless shown as blue land under our control, the boat and car park, 100m from the main Club building, has provided the opportunity to encourage bio-diversity benefits. We look after the grass banks, grassed and gravel areas and even disused items such as tyres provide habitat for frogs, slow worms, and other invertebrates. The Club also plan to embrace water harvesting between containers in the boat park in the future.

6.71. Policies ENV DM1 and ENV DM2 require the applicant to prepare a Preliminary Ecological Appraisal. The Club have looked in detail at the full contents of the relevant policies. The focus of Policy ENV DM2 is mainly on Pagham Harbour and development proposals of a more ‘major’ nature.

6.72. The requirement for applicants' to prepare an "Appropriate Assessment" does not appear to apply to Pagham Yacht Club as we are not directly within Pagham Harbour. However, in line with the non-designated sites outside criteria, and the spirit of the Biodiversity Opportunity Areas (BOAs) objectives, the Club have and will continue to act responsibly. In so doing, the Club will embrace biodiversity conservation and have identified areas that provide the greatest opportunity for habitat creation and restoration and in so doing, the Club can contribute to improving the natural environment. The measures were set out under the Marine Plan and Biodiversity sections above. Furthermore, the Club would be happy to work with specialists to introduce story boards to help interpret, educate and signal the importance of Pagham Harbour.

6.73. By way of example, the Club recently hosted a presentation of "Sussex Underwater" to its members and guests, with the aim of educating the next generation of sea protectors.

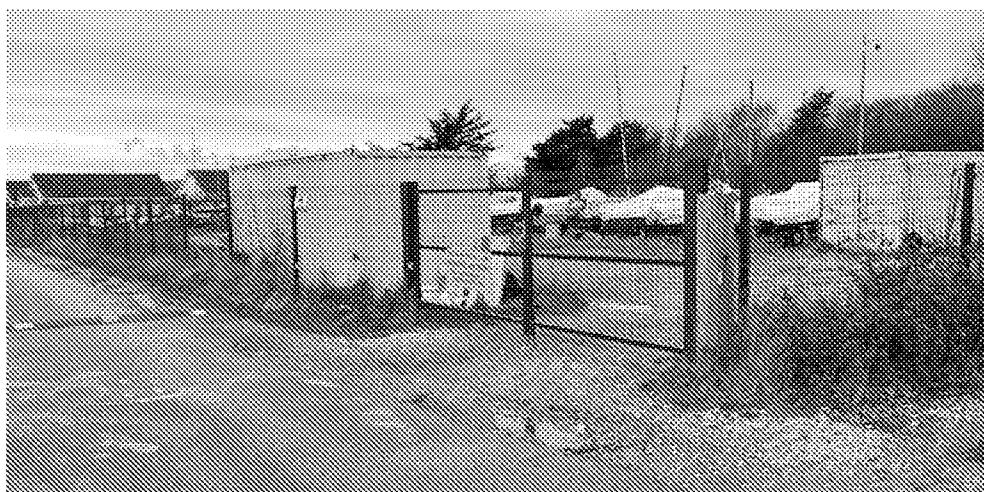
6.74. In view of the minor floor area increase to provide a cycle store, the objective to improve existing member facilities rather than to increase membership numbers, together with our current efforts to help the Pagham Harbour Special Protection Area, the Club feels that the proposed works would not conflict with Policies ENV DM1 and in turn comply with Policy ENV DM2 of the local plan.

Transport and Parking

6.75. During the pre-application discussions ADC referred to Policy T SP1 and The Arun Parking Standards SPD (Jan 2020).

6.76. Policy T SP1 of the local plan supports sustainable means of transport to reduce the need for car travel, it promotes green infrastructure, protects the major road network, maintains appropriate levels of parking standards and requires applications to consider and design for development in relation to transport infrastructure.

6.77. The Arun Parking Standards SPD (Jan 2020) suggest there should be 1 cycle parking space per 4 members of staff plus customer cycle parking. Currently, there are informal cycle parking areas around the Club, at the front next to West Front Road, and next to the beach at the rear. Essentially, members padlock bikes to pillars, front railings or use beach cycle facilities. Through the proposed dedicated cycle hub at the front of the building, the Club would introduce secure and covered cycle parking which will encourage members to cycle rather than drive.





Photos 13 and 14 – Car and Boat Park 100m from Clubhouse

6.78. At present the Club makes use of a boat park, which also has some parking spaces, around 15 in total. By day, these parking spaces tend to be used by sailors or those fishing, enabling them to transport equipment, for those occasions when they go out on the water, and sometimes when repairs are necessary to repair the boats. At other times, some members use the parking spaces when socialising at the Club. In that the boat/car park is 100m from the main building, usage is low and often not at all. There is also a car park, free to use for much of the year, opposite the Pagham Beach café.

6.79. Over 60% of members, the regulars, live within 1 mile of the Club premises. There are no parking spaces at the site. Some members use on-street parking spaces but there are yellow line restrictions in the vicinity. The Club is easily accessible by bus, in that the 600 bus stop is available some 100m from the Club premises, and the Club encourages walking, the use of bikes and car sharing when needed. In that a part of the proposal would include a new larger, secure and weather protected cycle compound, the Club feel that this new facility would incentivise members to cycle, meaning fewer car trips than at present.

6.80. Pagham Yacht Club feel “1 cycle parking space per 4 members of staff plus customer cycle parking” provision indicated by Arun Parking Standards SPD doesn’t really fit with the Club structure. In that we are a volunteer based Club, and have no staff, currently there are probably no more than four volunteers on duty at any one time. Mostly, it is just one person on duty. For example, duties could cover, the bar, the galley, the bridge and the safety boat serving a membership of around 400. Many are elderly long standing members. The Club will more than double its cycle parking provision (around 20 cycle spaces) as well as create a secure and covered environment for cyclists it is felt that we more than meet the SPD standards.

6.81. In terms of the proposed scheme, the requirements of Policy T SP1 of the local plan have been met through:

- ✓ the Club policy to reduce car travel, to promote walking and cycling and through the limited parking provision
- ✓ the development is not designed to increase membership so there will be no added pressures, only sustainable improvements
- ✓ we aim to achieve an acceptable balance between parking provision to meet members needs, for example for long standing elderly members and those active that need to tow boats and get equipment to the Club ie wetsuits, fishing equipment, boards and kayaks but also easy access by other sustainable means.

6.82. The Club are satisfied that the cycle parking provision will be a significant improvement compared to the existing cycle facilities and would more than meet the Arun Parking Standards and the member demands coming from the Club.

Flooding

6.83. ADC Planning pre-application response has advised that “....the site is within Flood Zone 3 and is at high risk of flooding, however, the vulnerability will not be changing....” and the works including additions are minor. ADC advise that: “A Flood Risk Assessment (FRA) will be required. The FRA should be appropriate to the scale, nature and location of the development, and proportionate to the degree of flood risk. The sequential test will not be required due to the scale of the proposal.....”

6.84. ADC also say: “....The proposal will need to accord with Policy W DM2 (a-f) of the ALP”

6.85. Policy W DM2 Flood Risk states:

“Development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment (SFRA) development will only be permitted where all of the following criteria have been satisfied: a. The sequential test in accordance with the National Planning Policy Guidance has been met. b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall. c. The sustainability benefits to the wider community are clearly identified. d. The scheme identifies adaptation and mitigation measures. e. Appropriate flood warning and evacuation plans are in place; and f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e. consideration of flood flow routing and utilising temporary storage areas.”

6.86. NPPF Guidance confirms that minor developments are unlikely to raise significant flood risk issues unless they would:

- have an adverse effect on a watercourse, floodplain or its flood defences;
- would impede access to flood defence and management facilities; or
- where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.

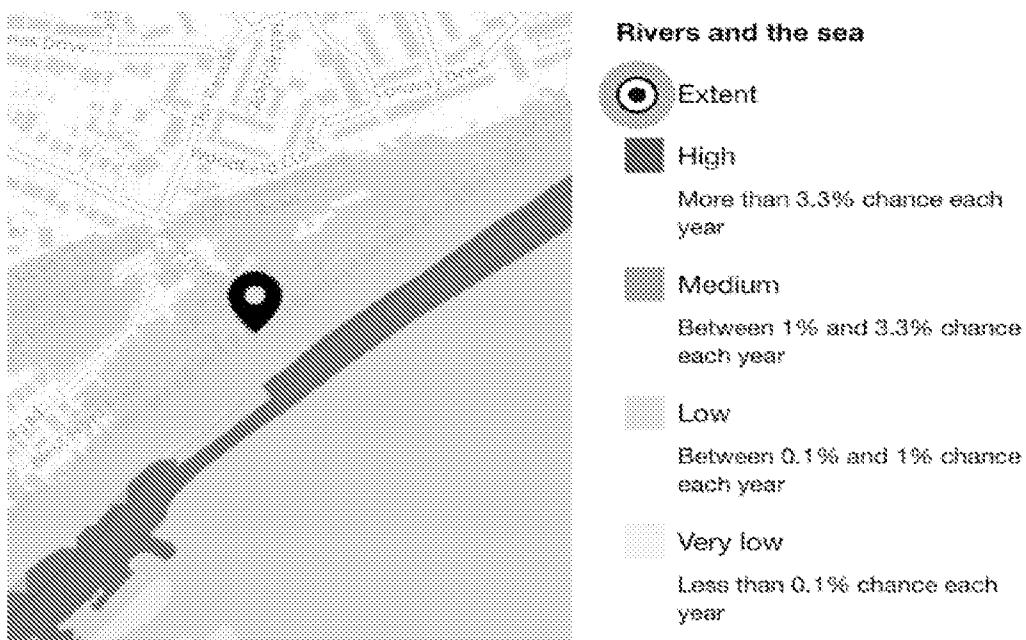


Diagram: Environment Agency Flood Risk – Rivers and the Sea

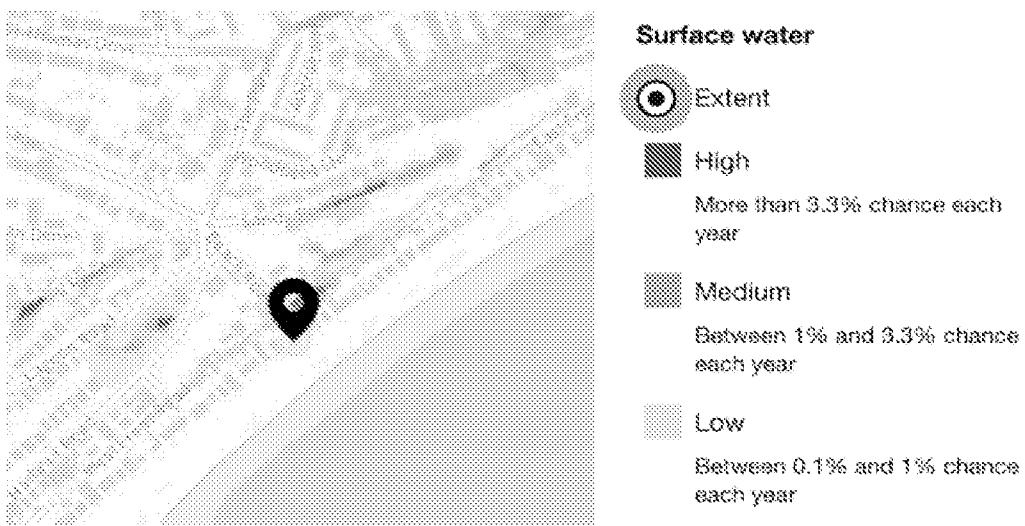


Diagram: Environment Agency Flood Risk – Surface Water

4.87. In response Pagham Yacht Club wish to draw attention to the minor nature of the proposed works which will not bring about an increased membership and are designed to improve the sailing and fishing experience for existing members, to make the premises more comfortable but also more operationally safe, secure and welcoming. The Flood Risk Assessment criteria response:

- a. The sequential test is not required – due to the scale and nature of the proposed works. It is a minor development comprising ‘alterations’, and although it incorporates a ‘small’ extension, this will be a cycle store under 250 square metres of leisure floorspace. The proposed works benefit from an exemption from the sequential test
- b. In terms of the application site it has been demonstrated that the alterations and additions will render the premises (including access and egress) safer, will not increase flood risk elsewhere, and through the sea defence measures at the rear, will reduce flood risk to the premises overall.
- c. The sustainability benefits to the wider community include the proposed solar panels and the cycling facility improvements
- d. The scheme identifies adaptation and mitigation measures through the sea defence measures at the rear.
- e. The premises are not in use for the vast majority of the week and the Club do not have a ‘live-in’ steward. In the event of ‘high risk to flooding’ warnings, the Club premises will not be opened. Should a sudden incident arise where the premises are in use and evacuation is necessary, the ‘Commodore’s bell’ is the method used to draw occupants attention to an emergency. No other warning or evacuation plans are in place. It is worth noting that due to the steep slope of ground levels from the beach down to West Front Road, the safest place is probably inside the building because a water surge would find it’s way down the two sides of the building to the lower levels at West Front Road.
- f. New site drainage systems are not necessary due to the nature of the proposed works. The alterations do not change our drainage arrangements, and as mentioned above, the flood flow routing will channel a water surge past the building, and occupy temporary flood storage areas nearby. One such flood storage area would be the Club car and boat park along the road. Furthermore, in the event of a flood incident, the Club premises would probably be a safe facility for anyone locally (positioned at lower levels and at higher risk) displaced due to flooding. We have toilet, changing, galley facilities, a drying area and plenty of space to bed down if necessary. The new cycle store at the front of the building is not a habitable area.

6.88. Whilst Policy W DM3 refers to Sustainable Urban Drainage Systems (SuDS), given the nature of the proposed works incorporating a minor addition, and mainly external and internal alterations, the changes to the existing building would not give rise to a need for a SuDS. Notwithstanding this, the Club have a permeable patio at the rear and shingle frontage, can introduce water butts, that could assist boat, paddle board and kayak washing to clear sea water from equipment, but also to clean fish debris, and there are plans for water harvesting (from the container roofs) in the car and boat park.

6.89. The Club considers that it has demonstrated that it complies with Policies W DM1, W DM2 and W DM3 of the local plan. In terms of NPPF the development is unlikely to raise significant flood risk issues to make it unacceptable. The development will nevertheless comply with Part H of the Building Regulations (Drainage and Waste Disposal) and the Surface Water Drainage Strategy is designed to satisfy sustainable urban drainage system principles (SuDS) to manage surface water runoff as close to its source as possible. This will ensure compliance with the SuDS Hierarchy and the national Non-Statutory Technical Standards for SuDS. The proposal will therefore comply with the NPPF, and ADC policies with regard to flood risk, sustainable drainage and water efficiency.

Climate Change

6.90. Two of the main proposed works would be the provision of 61 solar panels and the new improved cycle store. Policy ECC SP2 of the local plan relates to energy and climate change mitigations and ADC Planning have said in their pre-application response: “.....extensions should utilise energy efficient measures that reflect current standards, use design and layout to promote energy efficiency and incorporate decentralised, renewable and low carbon energy supply systems in development. ADC concluded: “The proposal to install solar panels will accord with Policy ECC SP2 of the ALP”.

6.91. Additionally, the new beach facing sliding doors together with the new side porch and door entry area will be more energy efficient, and all materials from the minor demolition works, will be reused. The proposed solar panels on the roof will generate electricity both for use by the Club and to contribute to the national grid and where changes are being made, more efficient water and heating technologies will be used introduced. There is no car parking on site.

6.92. The planned 61 solar panel provision we don't think requires permission. The solar provision at this stage exceeds the credits necessary for a development of this size, with mainly alterations to an existing sports facility and very minor floor area additions. The proposal in hand represents phases 1-4 of the works the Club is proposing. It is hoped that when Phase 5 comes forward at a later stage, the credits accrued through this stage of the proposed works will carry over for the next Phase of works when we apply for the next planning permission in the years to come.

7. Conclusions

7.1. Pagham Yacht Club are grateful to ADC Planning for their help and support through the pre-application process. The Club have listened to the advice, adapted the proposals to embrace the suggestions and we feel we have provided the supporting information requested based on the nature of the proposals in hand.

7.2. The local constraints are many and varied but the Club have been mindful of the minor nature of the proposals, the limitations caused by the existing floor levels, which cannot be changed within the scope of the planned proposals and we feel a difficult path has been followed when supplying information. The highlighted issues of design, flooding, coastal protection, transport, ecology and biodiversity have been addressed in the paragraphs above but not with full technical reports. It is felt that where further additional information might be required, this can be conditioned at the time permission is granted. At all stages, the Club will be willing to cooperate and work with ADC Planning to achieve the right outcomes.

7.3. The local constraints have proved a challenge but the Club are determined to improve the quality of on-water activities for our members, to continue to deliver opportunities to the local community and it is requested that due weight be given to the Club's track record and the importance of health and well-being when evaluating what are often competing policies and challenges.

7.4. In this regard, due weight should be given to the NPPF suggested presumption in favour of sustainable development, that "...local planning authorities should approach decisions on proposed development in a positive and creative way, work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."

7.5. Similarly, the NPPF is positive about the ".....development of accessible local services and community facilities such as sports venues and open space." (Paragraph 88d) The document refers to an aim "..... to achieve healthy places by providing sports facilities....." (Paragraph 96c) and also to "...provide the social, recreational and cultural facilities and services that the community needs.....{and}ensure that established facilities are able to develop and modernise and are retained for the benefit of the community" (Paragraph 98).

7.6. In terms of the local plan, ADC Planning are requested to give suitable weight to Policy HWB SP1 of the ALP in that the Club aim to maximise the impact it can make towards promoting healthy communities and reducing health inequalities through proposals that support outdoor water-based activities.

7.7. In terms of the Local Plan, Policy TOU SP1 - Sustainable tourism and the visitor economy – the PYC proposal will support sustainable tourism in that an improved Club facility would build on current links with tourist locations, such as Church Farm Holiday Park in Pagham, and local B&B's and AirB&B's, from where lots of our members have originated having visited Pagham. Improved facilities would encourage long-term visitor interest and activity, would help support a viable visitor economy, provides benefit to local people and businesses and it could help extend the visitor season.

7.8. Policy TOU DM1 - Tourism related development – the development proposals would strengthen local visitor attractions, facilities and accommodation. If past experiences are anything to go by, the development proposals, could attract visitors to the location through it's 'try-sail' and 'Paddlers' options that would be open to visitors and non-members in the area.

7.9. The Pagham Village Plan is similarly supportive where it says "Pagham Parish Council will alsosecure retention and promote community use of privately owned space particularly..... recreational use that has prevailed over a significant period of time....."

7.10. As previously stated, we welcome the pre-application stance from ADC Planning where it was stated "...the upgrade of the yacht club will contribute towards encouraging health and wellbeing whilst ensuring the site is accessible to all residents and visitors.....this will maximise the impact the yacht club could have in the community."

7.11. Pagham yacht Club consider the national and local policy requirements have been met and respectfully request that the development proposals be granted permission subject to appropriate planning conditions.