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From: SOSCA [REDACTED]

Sent: 28 April 2020 16:30

To: Raymond Cole <Raymond.Cole@arun.gov.uk>

Cc: Philippa Dart <Philippa.Dart@arun.gov.uk>; Karl Roberts <Karl.Roberts@arun.gov.uk>; Nigel Lynn <Nigel.Lynn@arun.gov.uk>

Subject: SEFTER ROAD PL - P/24/20/RES

Dear Mr. Cole, The SOSCA Alliance represents concerned communities right across the Chichester Coastal Plain and includes the MPAG group who represents the communities throughout the Manhood Peninsula. We have been made aware of this Planning Application through the Pagham community who are part of the Alliance.

We are setting out our objections to this application for we feel that it should be revised on the basis that it was applied for originally in 2016 and since that time there have been significant changes in scientific research. The attached response from SOSCA is the accumulation of science based knowledge from various international institutions and the EU on the effects of climate change and the resulting sea level rises. These changed climatic conditions on such a low lying area will inevitably have a devastating effect on the local environment and its bio diversity. We therefore strongly recommend that Arun District Council take these findings in to account and revise the Planning Application.

Please could you confirm your receipt of this e mail. Thank You. Libby Alexander

Libby Alexander

On Behalf of SOSCA.org.uk

Save Our South Coast Alliance

www.sosca.org.uk



Pagham is part of one of the most vulnerable, dynamic and environmentally important coastal areas in the south of England. The site on which these houses will be built and surrounding areas will certainly be impacted by sea level rise, groundwater, fluvial and surface water flooding within the lifetime of this development.

As a Council which has declared a Climate Change Emergency, Arun should adhere to the Environment Agency's and Committee for Climate Change 2020 guidance of planning NOW for a predicted global temperature increase of between 2 to 4 degrees by 2100.^[1]

The seriousness of sea level rise impact on this site is starkly illustrated in a recently published study by Lund University, Sweden.^[2] The study entitled "Inundation scenarios in a changing climate: assessing potential impacts of sea-level rise on the coast of South-East England" is based on high-accuracy LiDAR mapping. The results clearly show how Pagham and Rose Green will suffer from extremely severe inundation as sea levels rise.

The report states that SLR (sea level rise) is a long-term threat which will continue through the 21st century and beyond, therefore a timely and ongoing adaptation response from policy-makers is vital for building resilient and sustainable coastal communities especially on the West Sussex coastal plain which is one of the most exposed regions in Britain to the SLR-induced inundation due to its low elevation and the fact that it is sinking.

By highlighting those low-lying areas which are exposed to permanent 3-metre or even 5-metre SLR inundation, the study also highlights those areas that, after a rise in sea level of 1 metre and, respectively, 3 metres, may be exposed to temporary flooding caused by a 2-metre tidal surge. This site is clearly at risk of such flooding.

The site, at the edge of the existing coastal conurbation and close to the important wetlands of Pagham, is typical of the type of land which should be set aside to allow for migration of wetlands as sea levels rise. According to the Lund University report, "an accelerated SLR will limit the capacity of coastal ecosystems to adapt, but, if they can keep pace with the future rise, coastal wetlands may be able to vertically accrete or migrate inland, as long as their migration is not impeded by topographical barriers, urban development or shoreline defence structures, which would result in "coastal squeeze" (Nagle 1998; Cooper et al. 2008; Zhang 2011; de Sherbinin et al. 2012; Blankespoor et al. 2014)." The study concludes that future SLR could have a significant impact on the South-East's coastal ecosystems. However, considering that coastal wetlands provide a large number of ecosystem services, including storm buffering, shoreline stabilisation, carbon sequestration and climate regulation (Brown et al. 2013; Blankespoor et al. 2014), their potential for landward migration in the region should be investigated in order to trigger action aimed at protecting them.

The study, along with other recent scientific guidance, states that **a 5-metre SLR is already locked-in due to the unavoidable 2°C of warming and that such a high rise this century is not impossible. As a result, it recommended that adaptation measures for a 5m SLR inundation scenario are implemented without delay.**

Due to the serious implications of climate change on this site and the repercussions its development could have on exposing people to future flood risk and in reducing capacity for wetland migration, the following clauses are taken from the NPPF and are considered to be relevant to the site.

> Section 14. Meeting the challenge of climate change, flooding and coastal change.

148. This clause states that the planning system should “in a changing climate, take full account of flood risk and coastal change”

149. “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change”

“ Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

155. “Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”

156. “Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources.”

158. “The aim of the sequential test is to steer new development to areas with the lowest risk of flooding.”

>Section 15. Conserving and enhancing the natural environment.

170. “Planning policies and decisions should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water , or noise pollution or land instability.”

Could the Council please advise how all of the above have been addressed on this site, and what cost provisions have been made should climate change predictions become reality, and from where this substantial financial commitment will be sourced.

