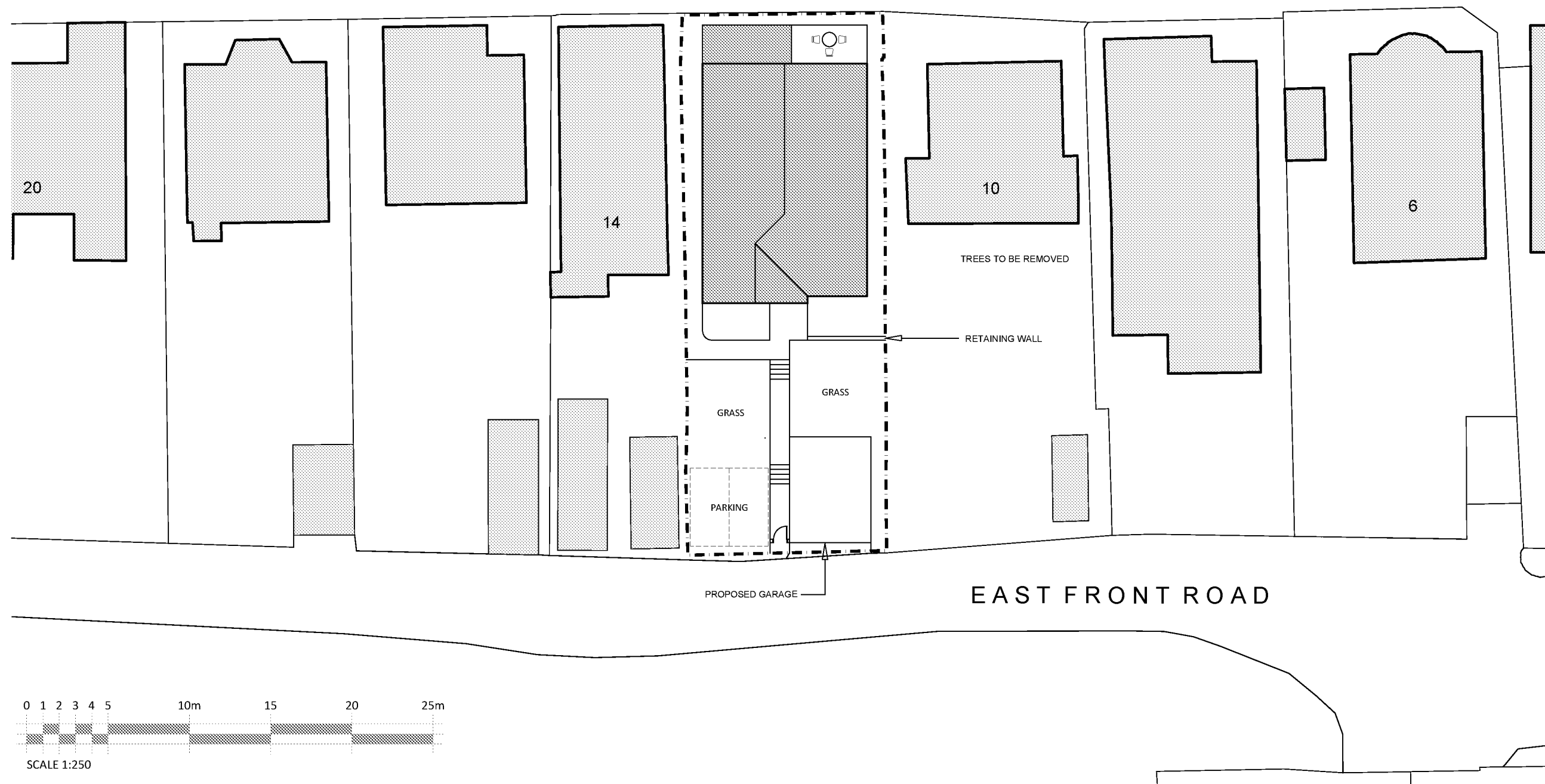
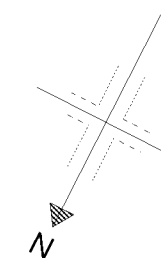
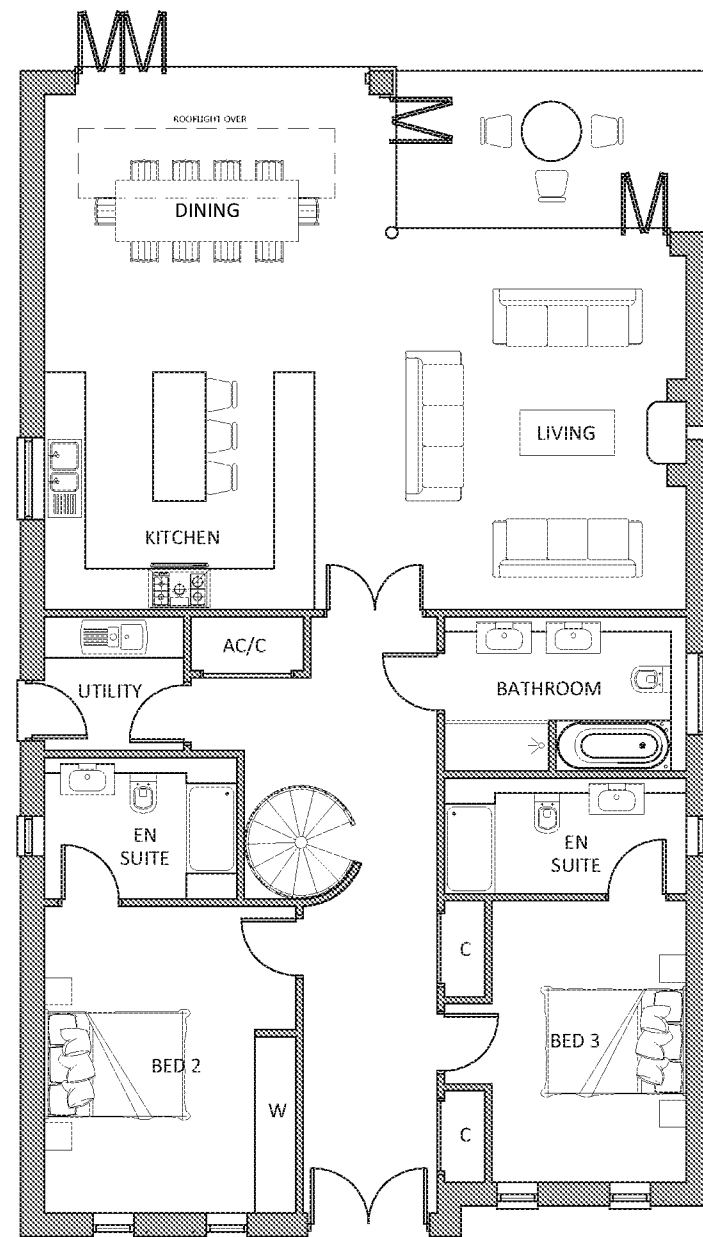
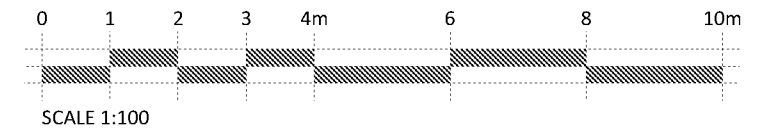


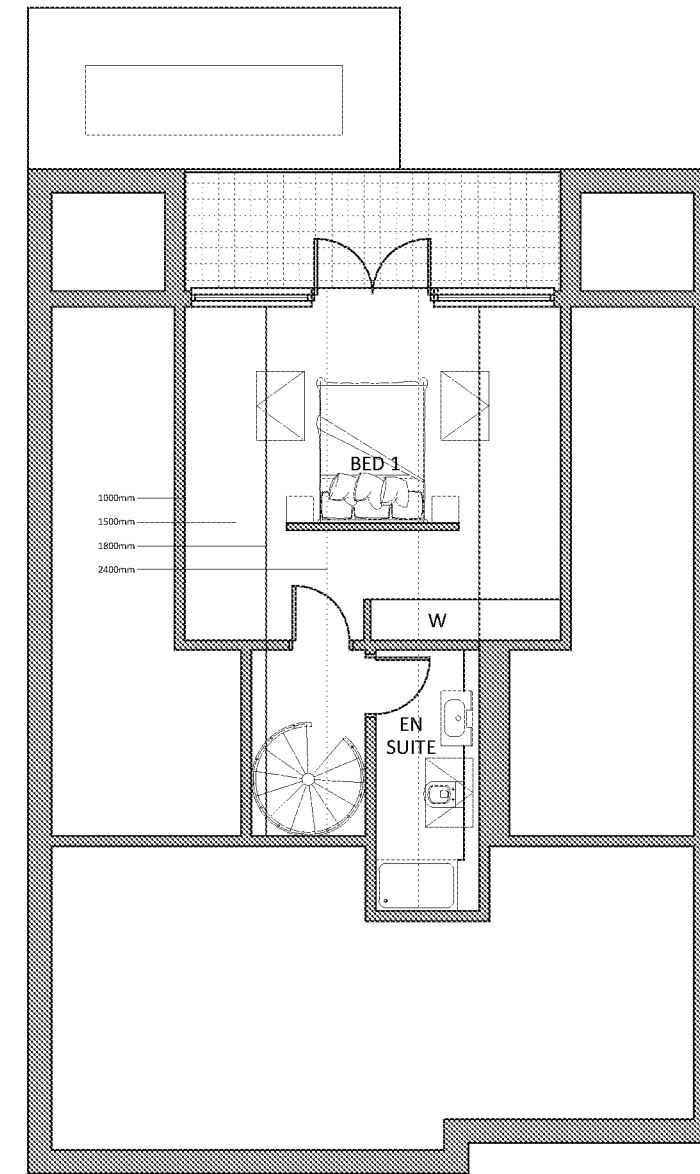




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												SCALE: 1:250 (AS ORIGINAL)			DRAWING: DRAFT SITE LAYOUT					
												DRAWN:		JOB NO:		DRAWING NO:			REVISION:	
												DATE:		2020 / P0096		SK01			-	
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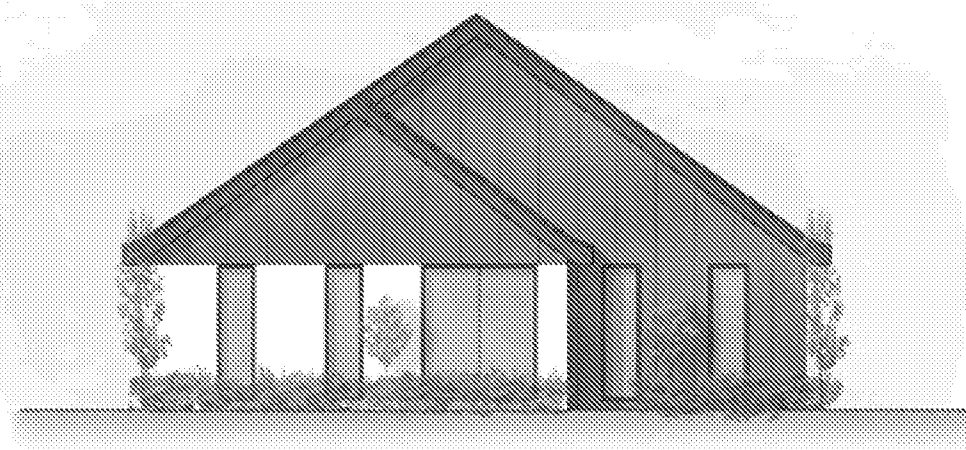
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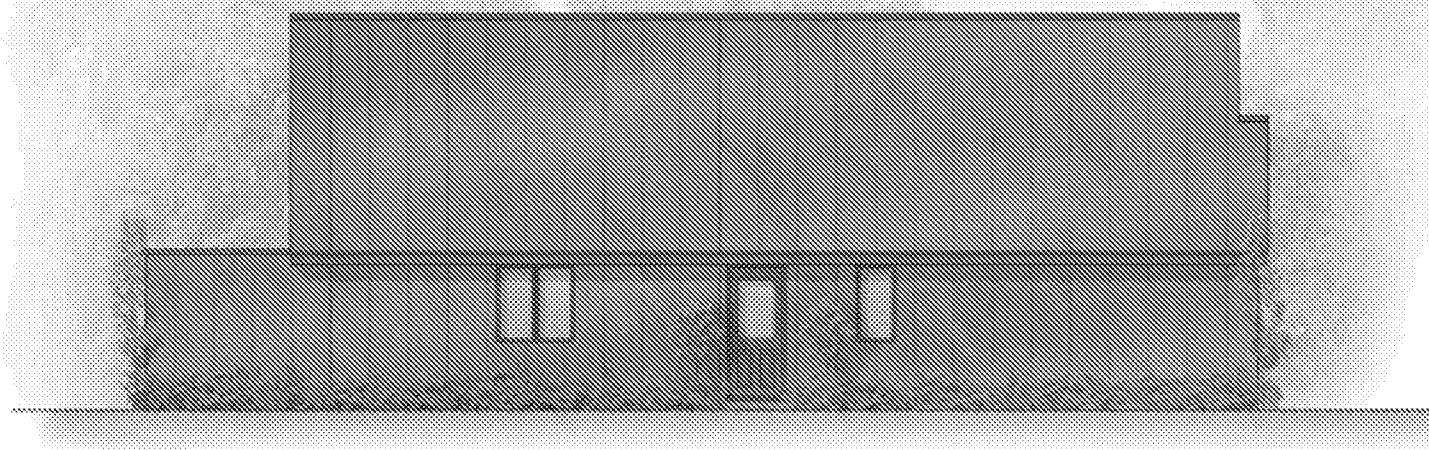
MEZZANINE LEVEL

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						MR K HAWTREE	12 EAST FRONT ROAD, PAGHAM, BOGNOR REGIS		
						SCALE: 1:100 (A3 ORIGINAL)	DRAWING: DRAFT FLOOR PLANS		
						DRAWN:	JOB NO: 2020 / P0096		
						DATE: JULY 2020	DRAWING NO: SK02	REVISION:	

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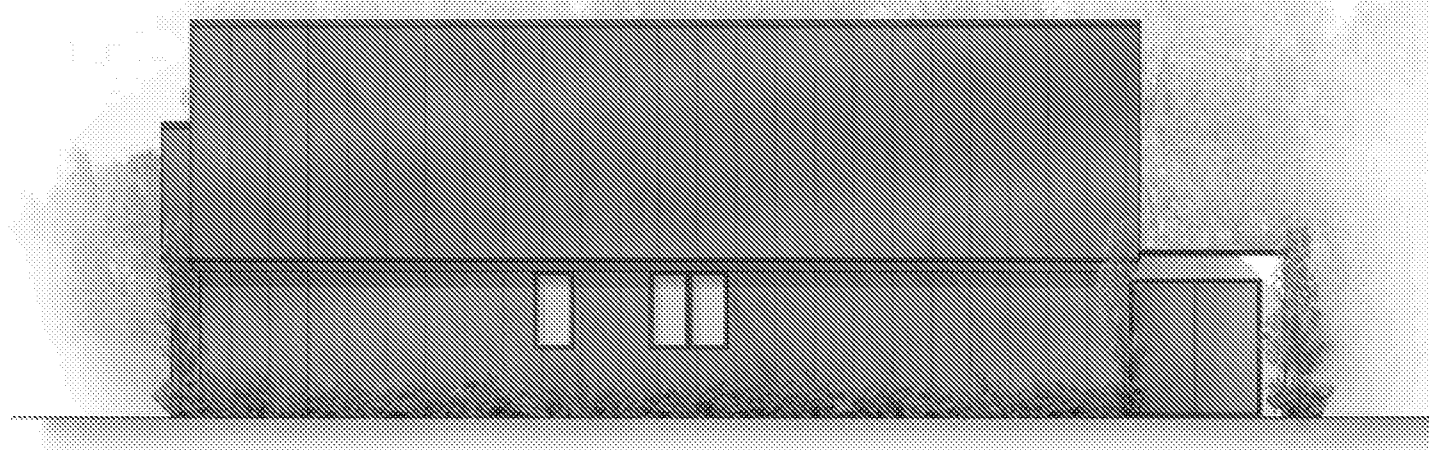
FRONT ELEVATION



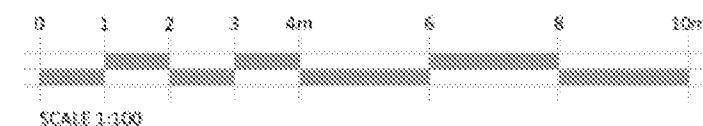
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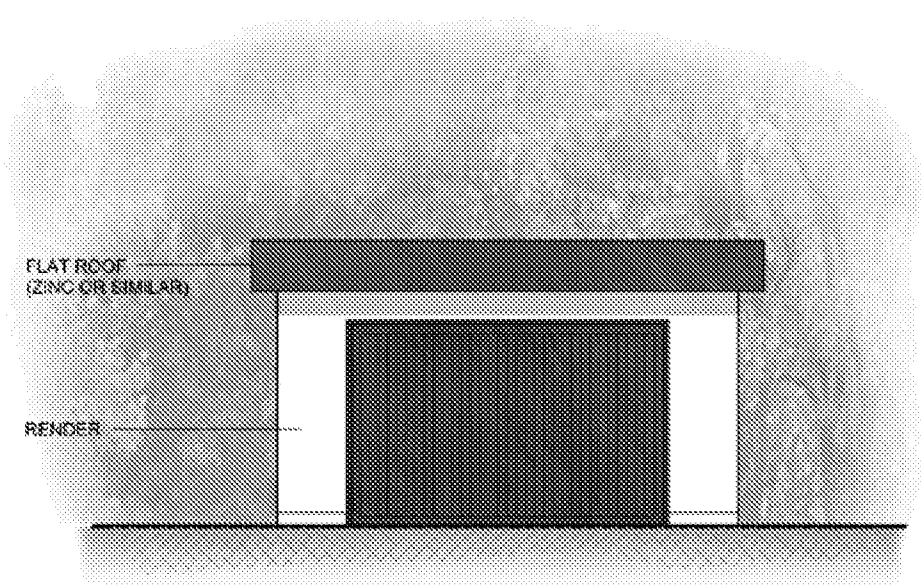
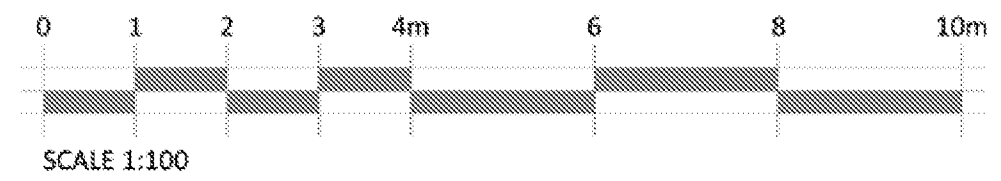
REAR ELEVATION



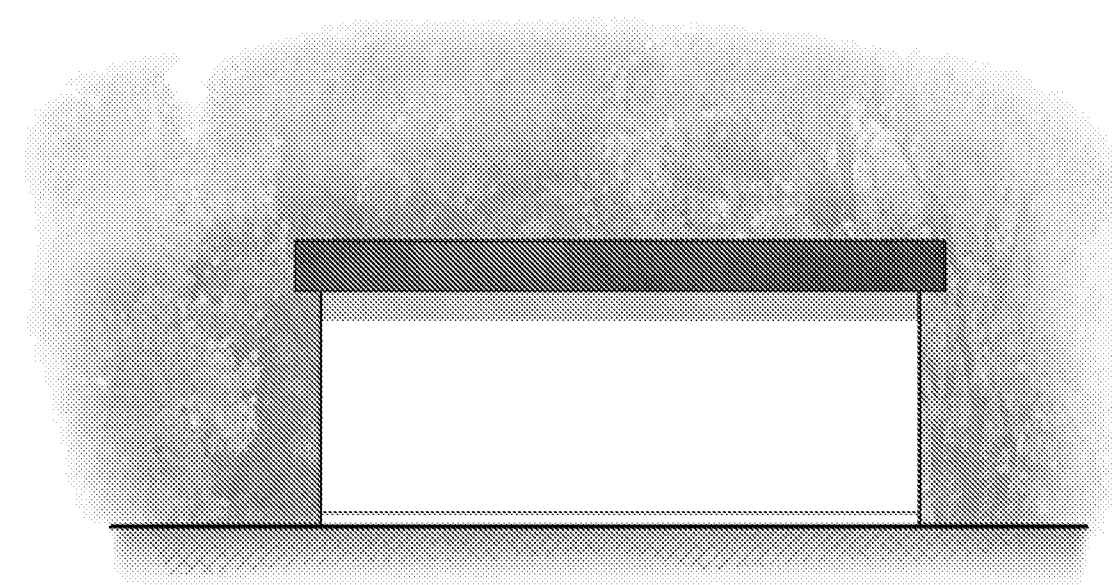
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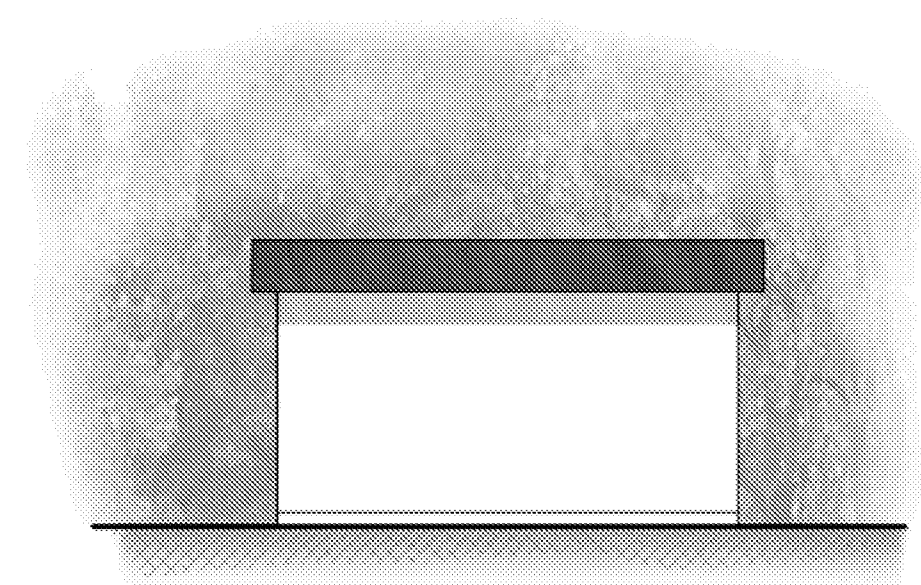
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						SCALE	1:100 (AS SHOWN)	DRAWINGS	DRAFT ELEVATIONS	
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						DATE	MAY 2020	2020 / P0096		



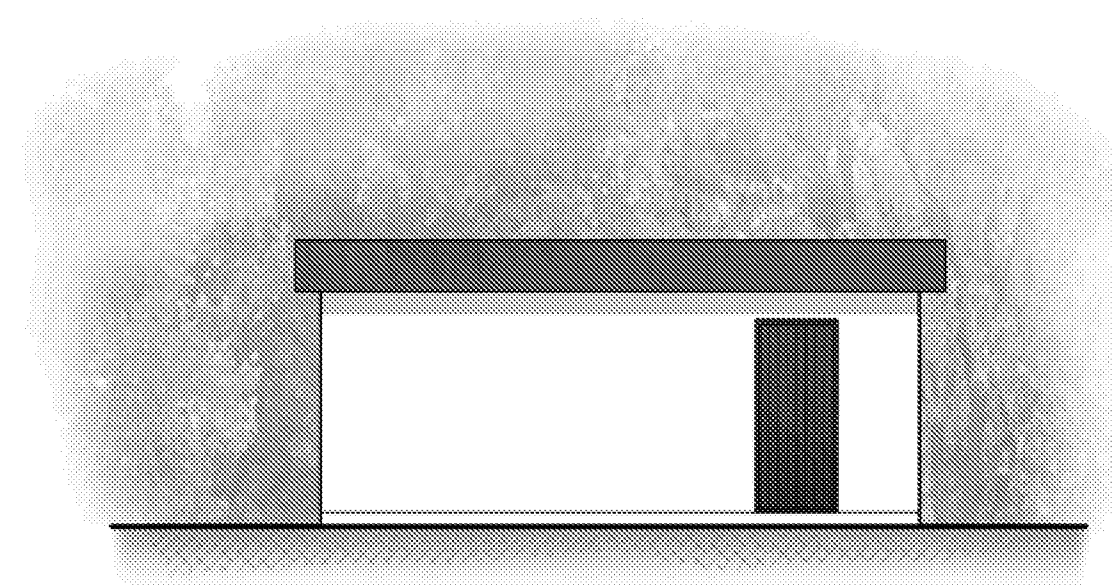
FRONT ELEVATION



SIDE ELEVATION

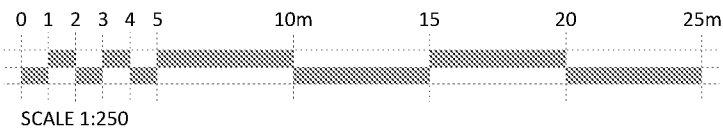
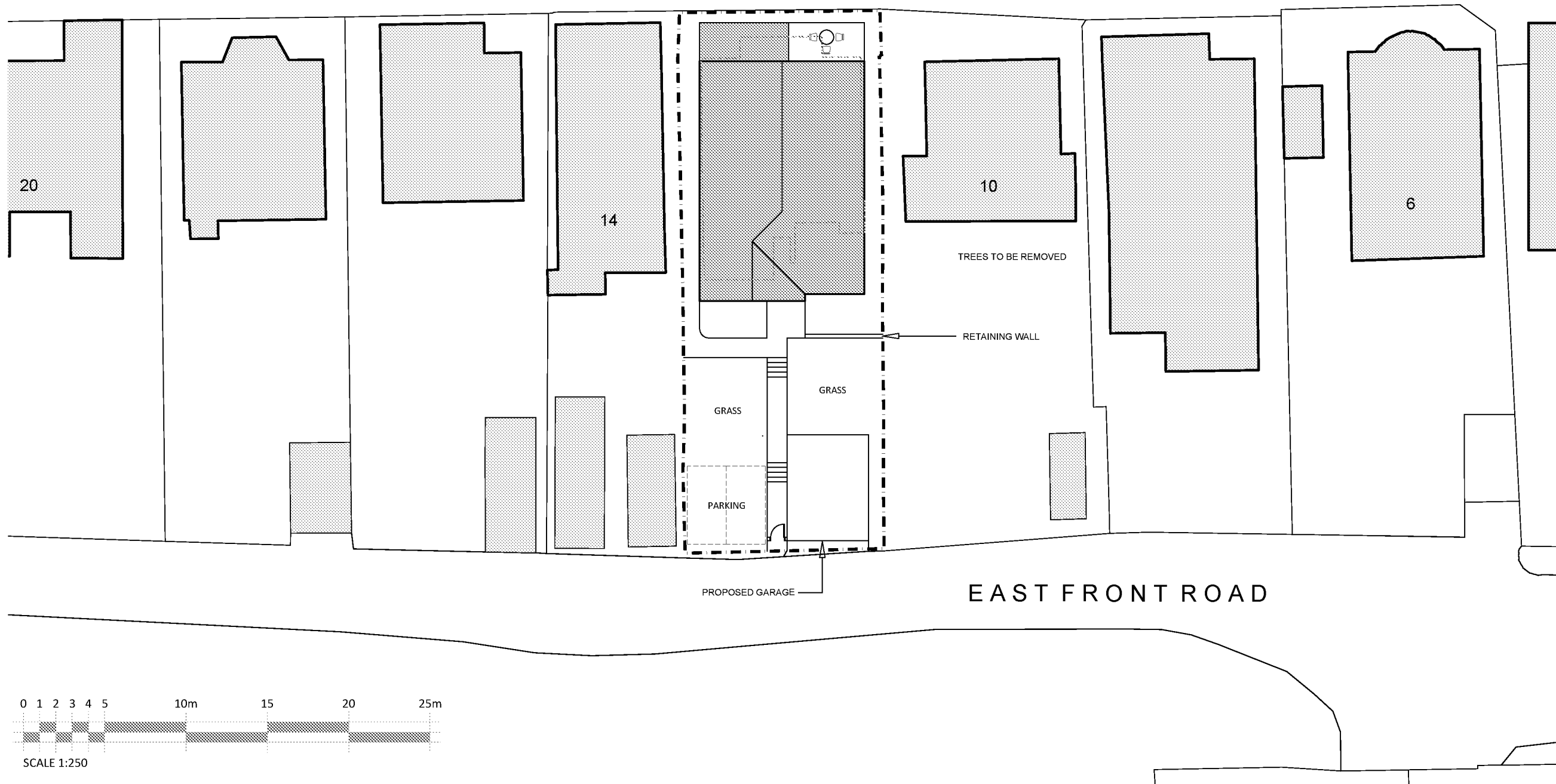
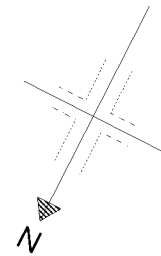


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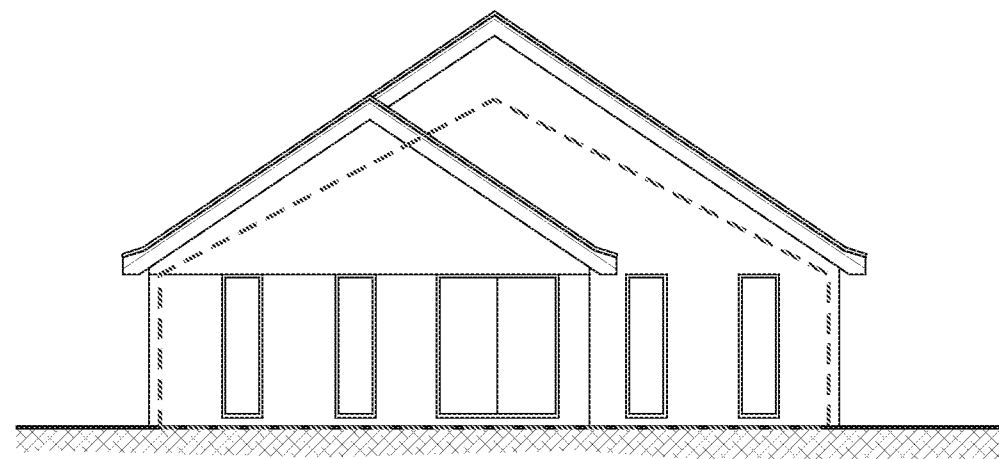


SIDE ELEVATION

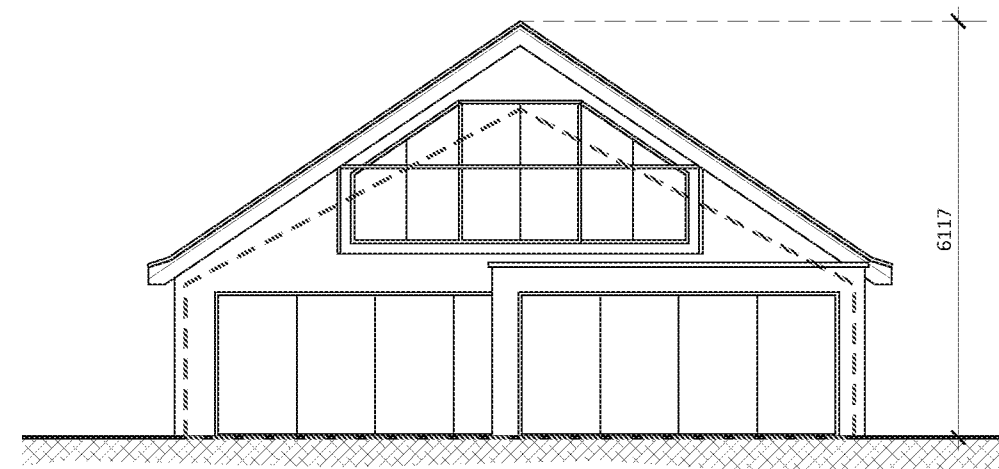
OUTLINE OF
EXISTING DWELLING



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						MR K HAWTREE	12 EAST FRONT ROAD, PAGHAM, BOGNOR REGIS		
						SCALE 1:250 (AS ORIGINAL)	DRAWING BUILDING FOOTPRINT COMPARISON		
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						DATE JULY 2020	2020 / P0096	DRAWING NO. SK06	REVISION: -

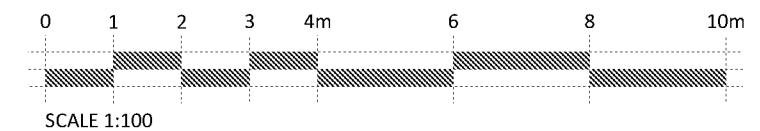


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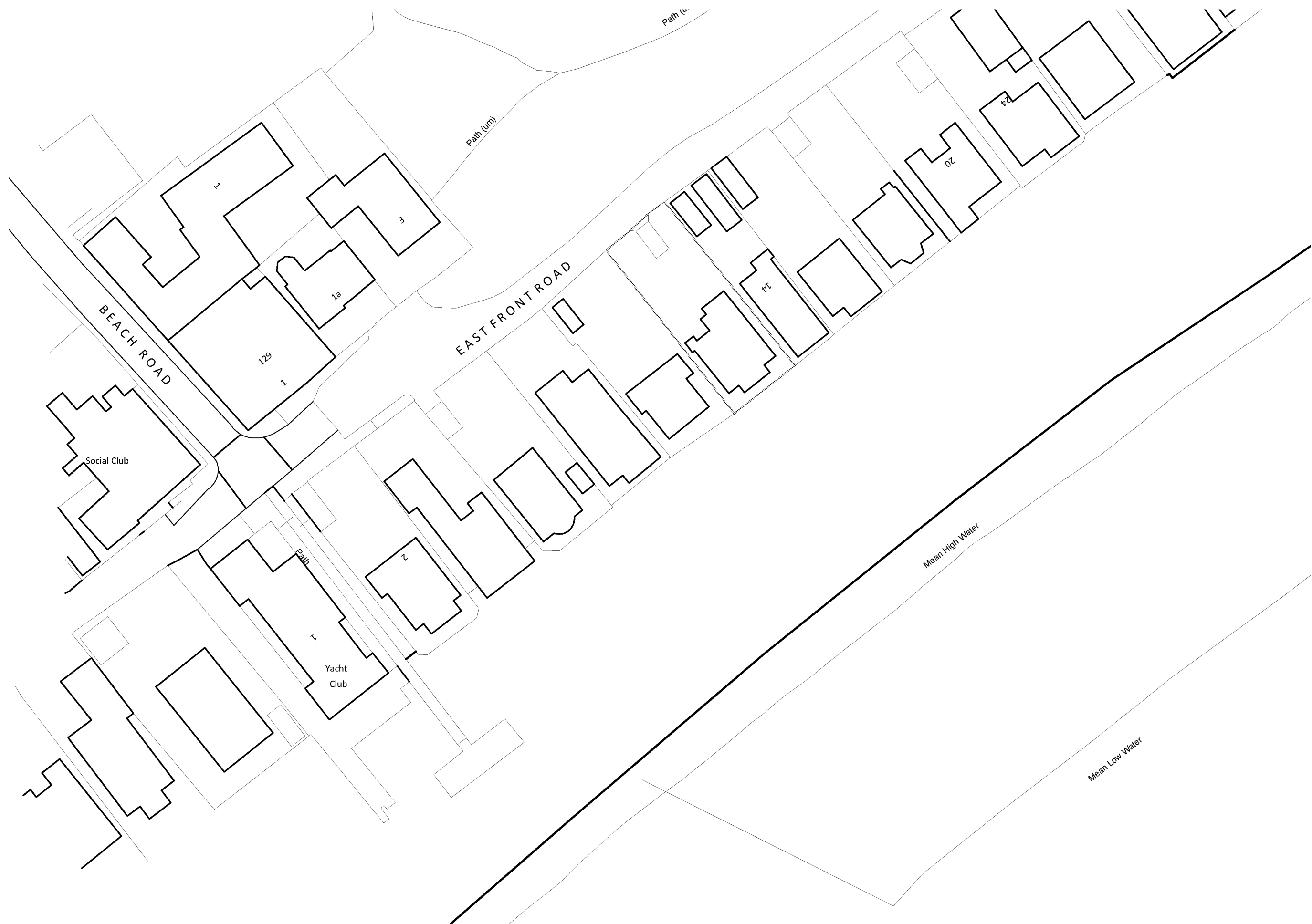
REAR ELEVATION


**OUTLINE OF
EXISTING DWELLING**



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						MR K HAWTREE	12 EAST FRONT ROAD, PAGHAM, BOGNOR REGIS		
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Pagham Parish Council – Meeting 28th July 2020

Your request for informal advice was considered by the Planning Committee yesterday evening and they have asked me to provide the following comments to you:

Pre application advice – 12 East Front Road Pagham PO21 4SU – Replacement Dwelling (details circulated)

Informal advice had been requested from a proposed developer of 12 East Front Road. RESOLVED: to make the following comments to the developer:

- The application is acceptable to the Parish Council in principle.
- The Council asks the developer to have regard to the Pagham Village Design Statement when finalising plans.
- Given the proximity of the property to the beach, the Council would wish to see detail regarding the method for digging the footings for the development included with the application. Developments on neighbouring properties had caused concern of flood risk in situations where insufficient lateral support had been included, or excavations left open for excessive periods before concrete was poured. An alternative which had worked well at other sites was contiguous piling.
- The Council was concerned to see the removal of trees was proposed and asked that further details be provided at the time of application.

Pagham Beach Holdings – 27th July 2020

Further to my e-mail below, I have now had an opportunity to consider your approach to the Company seeking our support for your client's proposal to demolish the existing building on site and erect a replacement dwelling. Having liaised with my co-Directors I would confirm that the Company would support the proposal, but I regret that the present Policies enforced by the Local Planning Authority, Arun District Council, are likely to result in the scheme being Refused, and you may wish to amend some details.

I assume that you have researched and have had regard to the recent Town Planning Decisions on the Pagham Beach Estate. You will therefore be aware that the site falls within the Pagham Beach Estate Character Area 5, within the Local Plan (previously referred to as an Area of Special Character). The site is also subject to the Policies defined within the Pagham Village Design Statement recently adopted by Pagham Parish Council. Both Policies seek limit development to:

- Single-storey construction
- Detached dwellings
- Pitched roofs that do not exceed 30 degree pitch

In general the scheme proposed for the above property does not comply with these objectives and may not therefore may not be Approved by the Planning Authority.

In addition, in view of recent and local coastal erosion that has been sustained at the mouth of Pagham Harbour and to West Front on the Estate, there is currently an embargo against the development of any new dwellings on the Estate, which has recently been interpreted by the District Council as also applying to replacement dwellings. I would refer you to Policy ECC SP1 of Arun District's Local Plan, together with Policy W DM2 of the Local Plan which sets out a 6-point criteria used to assess development at risk of flooding. Notably criteria (b) requires a site specific Flood Risk Assessment and any FRA should demonstrate that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.

These Policies have been used against development proposals put forward by the Company for new dwellings on the Estate.

I would also particularly draw your attention to a recent ADC Decision dated 1st May 2020 with Planning ref: P/117/19/PL for a replacement dwelling at 36 Rast Front Road, where the Application was Refused. The Officer's Report for this Application includes the following statement:

" According to the Pagham to East Head Coastal Defence Strategy 2010, large shingle banks in front of and on either side of Pagham Harbour, provide the defences in this area. It is anticipated that erosion to the north of the Harbour entrance will lead to the loss of 160 houses built on the shingle bank at Pagham Beach. This area falls within Flood Zone 3 from tidal sources and ground water flooding owing to the the underlying geological conditions."

The Officer's Report also includes the following:

"CONSULTATION RESPONSES RECEIVED:

Natural England - No objection Based on plans submitted, Natural England considers the development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Environmental Health - No objection/comments.

Arun Engineering Services Manager - OBJECT. Pagham Beach is a highly designated site in terms of geomorphology, flora and fauna. The beach on which the estate is constructed is dynamic and in the past 10 - 15 years we have seen the growth, breach and redistribution of a shingle spit emanating from the Church Norton side of the harbour channel.

This may seem like a long distance away from the site but coastal processes are such that effects (natural or otherwise) can be seen at some considerable distance and over a long timescale.

The beach has suffered from erosion over the past 10 or so years in various places - those places being correlated to the length of the spit. The spit naturally breached in 2016 but the effects are still evident - especially on East Front Road.

36 East Front Road is more or less in the centre of the current erosion zone and this Council is spending considerable amounts of money to maintain the beach, to reduce flood and erosion risk. Whilst the Shoreline Management Plan policy is to hold the line and the Coastal Defence Strategy option to achieve that policy is Adaptive Management, there is no guarantee of funding to achieve it. Indeed, any government funding (based on numbers of homes) for protecting the wider area, would not be able to count a new home, as it would have been built after a cut-off date in 2012.

The Council's Engineer is unable to provide a suitable level of confidence that this site would be a safe development site for the time being. It is concluded, given the vulnerable status of the area, that this development cannot be considered to be a sustainable form of development and would be contrary to the aims and intentions of the NPPF.

A Coastal Change Management Area has not been declared for this part of the coastline but the issues above point to a special condition that combined reasons leads the Engineer to object.

Arun District Council Drainage Engineer- No comments received

Environmental Agency- No objection subject to the imposition of a condition"

These comments seem particularly relevant to the above proposal, but I believe with a robust Consultants Report can be challenged.

I understand that the reference to "the loss of 160 homes" is from the 2010 Coastal Defence Strategy, which may have applied then, but is now 10 years out of date and the shingle beach at Pagham is a dynamic structure and subject to regular change. The spit breached naturally in 2016 but is building up again.

The Officer does not mention the Planning Application P/97/15/PL that was eventually Approved in 2017 to cut through the spit and to attempt to stabilise the Harbour mouth. Those works have been delayed by the Covid pandemic and the dates for Conditions to be completed defined by within the Approval have been extended by the Secretary of State but regrettably there is still no timescale for when this work will be carried out.

The effect that the Approved work will have on the alleged loss of homes on the shinglebank at Pagham Beach has not been considered. The Officer has also apparently ignored the costly work carried out in 2018 by EA and Bourne Leisure raising the bunds around the Harbour, which will also have an impact on coastal erosion at Pagham and the potential loss of homes.

The Company's Planning Applications referred to above were supported by Flood Risk Assessments but those findings were dismissed by the Planning Authority. I believe that a more robust FRA is required to challenge this present situation.

The Application Site also falls within the 2km buffer zone for Pagham Harbour & Bognor Reef SSSI designations which are sites of National Importance for Nature Conservation. It should be particularly noted that Policy ENV DN1 of the Arun Local Plan makes it clear that any proposed development likely to have an adverse effect on the designated features of the SSSI would not be permitted, and an Ecological Report should be prepared to support your proposal.

Again, the Company's development proposals referred to above were supported by Ecological Reports, but it was felt these did not fully uphold the proposals and again I believe a more robust Ecological Report would be required to challenge this position.

As you will see, residential development on Pagham Beach Estate is difficult and requires input from consultants to respond to and challenge the LPA on both Flood Risk/Coastal Erosion issues and Ecological Reports. In truth, the consultants previously instructed by the Company have not been successful on such matters and therefore the Company cannot recommend that they are used again. I am quite willing to provide names and contact details of consultants previously instructed in order that they can be avoided.

The Company is however aware that there is a groundswell of demand from approximately four parties for residential development on the Estate and it occurs that if suitable consultants are selected that can meet these challenges, perhaps the fee cost of these consultants to successfully advise upon the development issues on the Beach Estate could be shared between the four parties referred above. These four parties would include the Company, your client and two other prospective developers also who have had development proposals on the Beach

Estate refused. I have not approached the other two parties on this matter, as yet. The selected consultants will need to be fully appraised of the problems that they will be up against.

I would be more than willing to meet with you to discuss this matter further, if you would wish to progress this. I therefore wait to hear from you.



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