

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

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From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Sent: 26 May 2022 12:35
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Consultation on: P/46/22/PL

**Demolition and erection of 1 No dwelling with detached garage, hardstanding and landscaping.
This application is in CIL Zone 4 and is CIL Liable as new dwelling (P/46/22/PL)
12 East Front Road,
Pagham,
PO21 4SU**

Thank you for the consultation on the above mentioned application.

Coast Protection **object** to the application.

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

I have tabulated the agreed approach below;

Category ref.	Development Type	Description	Decision
1	All new development	-	Not permitted
2	All redevelopment – (new structure[s])	Where there is significantly raised level of risk now or in predictions covering the ensuing 5 years	Not permitted
3	All redevelopment (new structure[s])	No raised level of risk now or in predictions	Permitted

		covering the ensuing 5 years and AND no occupier density increase	finished floor levels to be at least 300mm above predicted flood levels in all cases
4	Reconstruction	Using substantial portions of the existing building – e.g. re-roofing or fenestration	Permitted with increased property level protection where practicable
5	Non-habitable development	e.g. garages, porches, non-habitable annexes	Permitted where otherwise allowed – conditioned upon continuing non-habitable status
6	Other risk reduction related development	-	permitted where otherwise allowed.

Link to draft minutes - [https://democracy.arun.gov.uk/documents/q1458/Printed minutes 06th-Oct-2021 18:00 Planning Policy Committee.pdf?T=1](https://democracy.arun.gov.uk/documents/q1458/Printed%20minutes%2006th-Oct-2021%2018:00%20Planning%20Policy%20Committee.pdf?T=1)

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

When assessing the proposal against the interim framework this application will fall into **category 2**.

Listed below are the reasons;

- Due to the dynamicity of the macro coastal system and the impact this has had on the beach immediately adjacent to the property there is currently little evidence to demonstrate that there is not a significantly raised level of risk now or in predictions covering the next 5 years.
- Arun District Council's beaches are surveyed bi-annually by Worthing Borough Council of behalf of the Regional Coastal Monitoring programme. The surveys utilise mobile laser scanners giving high accuracy measurements from which cross sectional profile volumes are extrapolated. The profile data enables coastal practitioners to analyse how the beach is performing long term as we have been collecting profile data for over 30 years – in some areas even longer. The profiles show that the beach immediately adjacent to this property registered its lowest cross sectional volume in 2019. From personal experience of manging this coastline this was during a period where Arun felt it necessary to carry out emergency shingle recycling schemes to prevent flooding and loss of property.
- The emergency recycling schemes have taken place with varying frequency and volumes since the winter of 2015. The winter of 2021/2022 has been the only exception to the recent trend whereby through careful assessment Arun District Council determined that a scheme was not necessary. There are numerous factors that determine if a response is necessary but primarily they are driven by crest width measurements and cross sectional volume analysis.
- The 2021 profiles indicate that the beach has begun to recover, but not to an extent that meaningful analysis can be drawn. I expect that the beach will continue to recover in the short term, but this is not guaranteed.
- Although this is secondary to the main objection, It is unclear if the proposal increases occupier density.

Conclusion:

- Given the dynamicity of the coastline and beach volumes this proposal does not fall into category 3, at the present time.
- It is not clear if the proposal increases occupier density. An increase in occupier density would not meet the requirements of the interim framework.
- The beach that the property benefits from is above emergency levels, but not at a stage where it has shown significant improvement.

Background:

Pagham beach is a highly designated site in terms of geomorphology, flora and fauna. The beach upon which the estate is constructed is also dynamic and in the past 10 – 15 years we have observed growth, breach and re-distribution of a shingle spit that emanates from the Church Norton side of the harbour channel.

This may seem like a long distance away from the site in question but coastal processes are such that effects (natural or otherwise) can be seen over considerable distanced and over long time scales.

Pagham beach has suffered from erosion over the past 10 years or so in various places – primarily those places have correlated to spit length. The spit breached naturally in 2016 but the effects of the system development are still evident

A Coastal Change Management Area has not been declared for this part of the coastline but the issues above highlight Pagham as a dynamic area and that leads me to question the appropriateness of the development, at this time . Therefore, all development should be considered with this in mind.

The community recently progressed a scheme to realign the harbour mouth which will provide some respite, although how long the alignment will be effective for is currently unknown. Moreover, though the work carried out by the community was approved, it was noted that it the operation would have a detrimental effect on an internationally designated site and as such, had to be signed off by the appropriate minister at the Department for Levelling Up, Housing & Communities. See **P/93/21/PL** for the full details.

The two recent spit growths and their trajectories demonstrates how quickly this piece of coastline can change. Furthermore, the Lagoon validates that the system has the potential to affect a much larger area than just the beach face.

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

- There can be no guarantee that homes situated next to the sea are 100% safe. Living close to any expanse of water always carries some level of risk; homeowners should be aware of this and should take appropriate precautionary measures if they consider it necessary.
- The Environment Agency flood maps indicate that the proposal is located in close proximity to Flood Zone 2 & Flood Zone 3. It should be understood that the mapping provided by the Environment Agency is indicative and subject to change as new information / modelling becomes available.
- The Environment Agency have produced National Coastal Erosion Risk Mapping. This dataset provides detail on the predicted erosion rates for the short, medium and long term, along with the shoreline management Plan for each epoch.
<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=9cef4a084bbb4954b970cd35b099d94c>
- The Beachy Head to Selsey Bill Shoreline Management Plan (SMP) provides a high level assessment of the risks associated with coastal evolution and presents a policy framework to address these risks. <http://www.se-coastalgroupp.org.uk/wp-content/uploads/2013/10/Beachy-Head-to-Selsey-Bill-SMP-FINAL.pdf>
- The 'Pagham to East Head Coastal Defence Strategy' sits below the SMP and suggests how best to manage coastal flooding and erosion risk over a 100 year strategy period for smaller lengths of coastline. The Strategy has identified shortlisted options on how this can be achieved, provided

funding is available. Full documentation can be found at: <https://drive.google.com/file/d/1kLyfHYo-4qrjWWLpiGmYiWP7idZpJFG/view>

- Living and building on the Coast In Arun <https://www.arun.gov.uk/living-and-building-on-the-coast>
- The Government's current strategy for funding capital works (e.g. major groyne replacement schemes) is known as Partnership Funding. If or when any Partnership Funding might be required direct beneficiaries of the defence are likely to be approached. I.e. those likely to be at risk from flooding or erosion within the timescale of the scheme. I have provided a link which explains partnership funding in greater detail - <https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding>

Regards,

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