



From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Sent: 21 July 2021 09:12
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Maria Tomalova <Maria.Tomalova@arun.gov.uk>; Roger Spencer <Roger.Spencer@arun.gov.uk>
Subject: RE: Planning Consultation on: P/61/21/PL

Dear Sir/Madam,

Sub division of existing private club to include 1 No. holiday let accommodation. This application is in CIL Zone 4 (zero rated) as other development

**The Pagham Club,
2 West Front Road,
Pagham,
PO21 4SY**

Coast Protection are not in a position to object to the application based on planning legislation and current policies. Therefore, Coast Protection have **No objection**.

FRA review:

Although the primary risk to the site is through coastal flooding the FRA fails to consider erosion risk.

The proposal will increase habitable space within flood zones 2 & 3 through change of use and will therefore increase flood and erosion risks as it will introduce new habitable space.

Please re-consult Coast Protection once a revised FRA is submitted.

Informative:

I would like to take this opportunity to make the Case Officer aware of the following;

- A site In very close proximity which would have increased habitable space was refused in 2016. See - P/94/15/PL.
- Cross Sectional Analyses shows that the adjacent barrier beach suffered from significant erosion between Dec 2013 and Dec 2018. During this period Arun District Council carried out numerous shingle recycling schemes necessary to stabilise the area and reduce the

risk of erosion and ensuing flooding; this was funded from finite sources and cannot be relied upon in the future.

- Arun District Council holds photographic records showing overtopping of the shingle beach which resulted in minor flooding of the junction of Beach Road, East Front Road and West Front Road. As far as the Council is aware 'The Pagham Club' did not experience any internal flooding.
- Subsequently, in December 2018, the beach in the area adjacent to the Application site began a natural recovery process, with beach volumes returning to pre-2013 levels by Spring 2020. This was partially aided by shingle recycling schemes.
- I am aware that previous applications in the area have been refused on coastal erosion grounds. While this property is not at an immediate risk of coastal erosion as the other sites were, coastal erosion of the barrier beach would lead to an increased flood risk.
- Although this particular section of coastline has recovered in recent years it is part of a larger coastal system and is considered to be in close proximity when assessing coastal risk. Therefore, at this time, it would be inappropriate for me to advise that it would not be subjected to coastal erosion and/or flooding at some point during the lifetime of the development. Where the "lifetime of the development" is defined by paragraph 026 (Reference ID: 7-026-20140306) of the Flood Risk and Coastal Change guidance - *"Residential development should be considered for a minimum of 100 years, unless there is specific justification for considering a shorter period."*
- Notwithstanding previous Coast Protection operations, the area remains susceptible to coastal erosion and ensuing flooding. Permitting the development shall not set precedent that the local authority will continue to exercise its **permissive powers** and carry out coast protection operations.

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 distances 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. Equally, the change in coastal processes is likely to have contributed to the erosion on East and West Front Roads as the beach reorganises finding a new "normal".

Whilst the Shoreline Management Plan policy is to 'Hold the Line' and the Coastal Defence Strategy option is to achieve that policy by Adaptive Management, there is no guarantee of funding to achieve it.

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 that leads me to question the appropriateness of the development, at this time.

Kind regards,

Karl McLaughlin

Coastal Engineer, Engineering Department

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

Sent: 24 May 2021 17:49

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: P/61/21/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

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

Planning Permission

Application No: P/61/21/PL

Registered: 13th May 2021

Site Address: The Pagham Club 2 West Front Road Pagham PO21 4SY

Grid Reference: 489095 97270

Description of Works: Sub division of existing private club to include 1 No. holiday let accommodation. This application is in CIL Zone 4 (zero rated) as other development.

The Council have received the above application.

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

Should you have any comments to make, these should be sent by replying to this email by 18th June 2021 . You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning.

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can the the leaflet how to respond to planning applications
<https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://www.planningportal.co.uk/info/200207/appeals> but they will protect personal details.

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

Yours sincerely

Maria Tomalova

Planning Officer- Arun District Council

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Email: maria.tomalova@arun.gov.uk

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