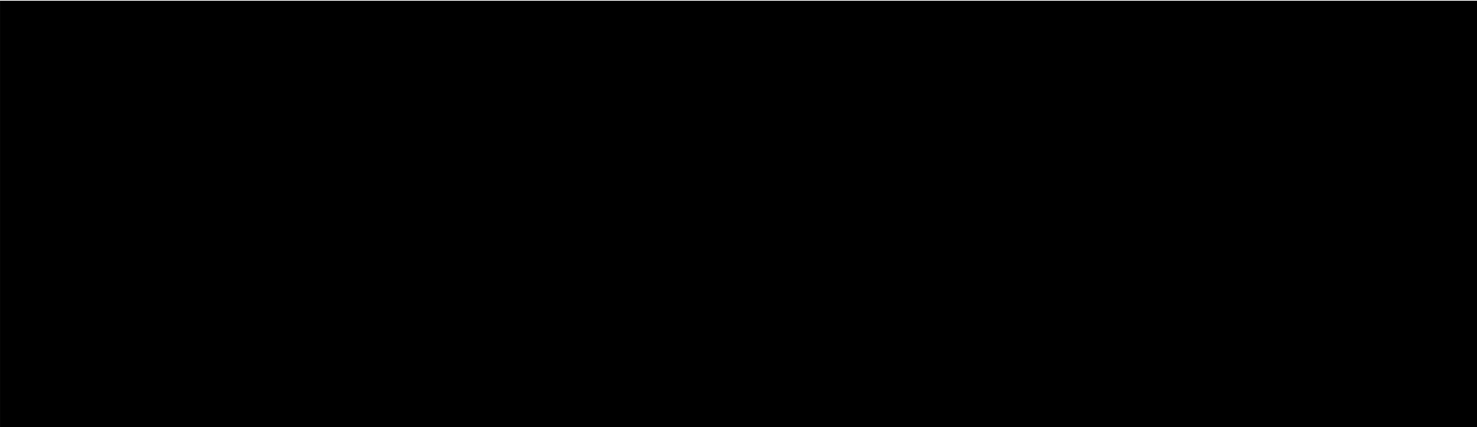




From: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>
Sent: 14 July 2021 15:13
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: P/68/21/PL

Dear Sir/Madam,

Part change of use of existing amusement arcade to managers accommodation (resubmission following P/48/20/PL). This site is in CIL zone 4 & is CIL Liable as new dwelling. (P/68/21/PL)

**Pagham Beach Amusement Arcade,
129 East Front Road,
Pagham,
PO21 4SX**

Thank you for the consultation on the above mentioned application.

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:

Section 5.3 – While not technically incorrect, it is not correct either. To be clear, the Shoreline Management Plan recommends a ‘Hold the Line’ policy but this is aspirational and dependant on funding.

Section 5.4 – Erosion has already been experienced on the adjacent foreshore which, at the time, led to increased overtopping and flooding. The dynamic nature of the coastal process system leads me to believe that this could potentially happen again within the lifetime of the development.

Section 7.2 – Following additional consultation, the applicant has confirmed that 129 East Front Road has been demolished and 3 East Front Road is their place of residence. Therefore, the change of use from commercial premises to residential premises will increase flood and coastal erosion risk as it will introduce new habitable space. The development would not provide betterment as the FRA suggests.

Informative:

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

- The site had an application previously approved in 2015 but the Coastal Engineer at the time did not make representation and substantial changes to the littoral (coastal) system have been observed since then. See - P/93/14/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 amusement arcade 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."*
- The applicant has stated that he has owned the property with his family for a number of years. I can therefore assume that they have witnessed the coastal erosion and ensuing flooding first hand.
- Therefore, I can also assume that should the application be approved, the Applicant is aware of the risks associated with carrying out development at the proposed location.
- 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.

Conclusion:

Given planning legislation, Coast Protection are not in a position to object to the application. However, the vulnerability of the site is unlikely to improve in the short-term with **funding and management challenges still prevalent.**

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

- The Environment Agency flood maps indicate that the proposal is located in 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.
- 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 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-coastalgroup.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-4qrIWWLpiGmYjWP7idZpJFG/view>
- 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 link at the bottom of the page which explains partnership funding in greater detail.

<https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding>

Regards,

Karl McLaughlin

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

Sent: 02 June 2021 08:19

To: Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>

Subject: Planning Consultation on: P/68/21/PL

To: Engineers (Coastal Protection)

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/68/21/PL

Registered: 25th May 2021

Site Address: Pagham Beach Amusement Arcade 129 East Front Road Pagham PO21 4SX

Grid Reference: 489113 97321

Description of Works: Part change of use of existing amusement arcade to managers accommodation (resubmission following P/48/20/PL). This site is in CIL zone 4 & is CIL Liable as new dwelling.

The Council have received the above application.

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

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests

for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 1st July 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

Mr S Davis

Planning Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLCONSULT (ODS) 2020