

[REDACTED]

From: Scott-Heagerty, Tom [REDACTED]
Sent: 25 August 2021 16:56
To: angela.marlow [REDACTED] Tom Day [REDACTED]
Cc: Seymour, James [REDACTED] Simon Davis <Simon.Davis@arun.gov.uk>; [REDACTED]
Subject: RE: Church Norton Spit planning application HRA

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Dear Tom,

Thank you for your email. I can confirm that you have identified the main issues that are to be addressed by the HRA. I've added a few more comments below that relate to your comments:

- The proposed location of the cut is directly through the current nesting area of the Little Tern population. The scale of works may be smaller, but will still result in direct loss of nesting habitat.
- Also, as a new location for the compensatory habitat has been proposed, this needs to be identified within the HRA as it is different to the original compensatory habitat included in the 2017 HRA.
- Although the area of cut in the spit is smaller than the previous application. The cut will still result in the detachment and loss of the distal end of the spit, which is still a considerable area that is functional (foraging and nesting) for a number of bird features. Although the cut area may roll back and weld onto Pagham beach, it's functionality will be lost to the bird features of the sites, as there is greater recreational disturbance along the Pagham beach compared with the Church Norton spit, where terns cannot nest.
- Natural England supports the new location for the compensatory tern island. However, we will still need reassurances that the compensatory habitat will remain suitable for the Little Tern population in the absence of nesting habitat on the Church Norton spit. Monitoring, management and possibly maintenance of the compensatory tern island should be considered, as we are concerned that the island could be exposed to additional erosion from the newly created channel. Reassurance on the likelihood of this and how this would be managed needs to set out.
- The risk of harbour closure still remains due to uncertainty of the natural processes after the cutting of the spit. Monitoring should continue and intervention should be made by using the proposed 'Traffic Light System'. We also acknowledge that adaptive management may be required again in the future, therefore monitoring of this dynamic coastline is required and would be in the communities best interest. – Continued monitoring will help develop future adaptive management plans and should enable them to work more closely with the natural processes.
- With regards to the Harbour becoming less well drained – we're following this up and will get back to you with more detail in due course. In principle if the spit is causes this reduced drainage (and the previous

longer spit did not have this effect, it just took longer to drain), we would likely accept this as natural change and if any management were required to address this, impacting other features such as the spit would not be the approach. Additional sedimentation in the harbour may result in the establishment of saltmarsh which potential maybe a benefit.

- If Pagham lagoon was to breach without this current intervention, flood risk aside. Natural England would see this as part of working with coastal processes and natural change. If the natural breach of the lagoon occurred and resulted in impacts to the designated bird features of the sites. Natural England may consider additional management measures to help support these populations.

Hopefully the additional information makes sense to you. Please do get in touch if you have any other questions.

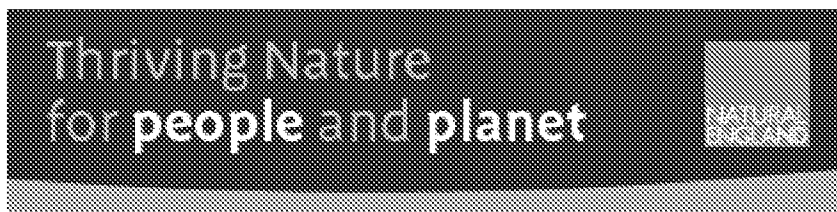
Many thanks,
Tom

Tom Scott-Heagerty

Lead Adviser - Sustainable Development
Sussex and Kent Area Team
Natural England
Guildbourne House
Worthing
BN11 1LD

Pronouns: he/him - [why have I put this?](#)

Working Pattern: Monday – Friday, 9am – 5pm
www.gov.uk/natural-england



We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

From: Tom Day [REDACTED]
Sent: 23 August 2021 11:52
To: Scott-Heagerty, Tom [REDACTED] Marlow, Angela [REDACTED]
Cc: 'Simon Davis' <Simon.Davis@arun.gov.uk>; Joanne Prichard [REDACTED] Seymour, James [REDACTED]
Subject: Church Norton Spit planning application HRA

Dear all,

I am working on the HRA for the Pagham spit applications (ADC P/93/21/PL, CDC 21/01921/FULEIA). Looking at the March 2017 HRA, I am trying to ascertain quickly the main points of change between that application and this. The main points I have identified so far (the first four from Tom's consultation response of 12 August, the last two from talking to Robin Henderson and Dom Henly):

- Smaller scale of works, but still some direct loss of tern habitat at the breach
- Area of the cut spit now smaller, again reducing the loss of nesting habitat – I'm assuming this cut area will roll back onto Pagham beach
- Compensation still required and proposed – new location of tern island has the support of RSPB (and Natural England?)
- Risk of harbour closing seems to be smaller than before having seen the way the natural breach behaved, but still need monitoring
- Counter risk now exists that the current situation is leading to the Harbour becoming less well drained – is this affecting intertidal habitats?
- Risk of breach into Pagham lagoon without intervention – putting aside flood risk issues, how would that affect the SPA/Ramsar/MCZ features of interest?

Although I've put some of the points above as questions, what I'm asking for at this stage is: Have I identified the main issues for the HRA and are any missing?

Having said that all informal comments / information welcome at this stage, of course.

Many thanks,

Tom



Tom Day
Environmental Co-ordinator
Environment
Chichester District Council

<http://www.chichester.gov.uk>

For all the latest coronavirus and council news, sign up to our monthly email newsletter:

<http://www.chichester.gov.uk/newsalerts>



From: Robin Henderson

Sent: 21 August 2021 15:09

To: Tom Day

Subject: Fwd: PCIAG members meeting and preparations

Tom

FYI - this note was sent following a meeting of the PGIAG Focus Group meeting on 12-2-21. The members of the Focus Group were from EA, NE, ADC and community (me). The recommendation in Item 4 triggered this application with the full support of all members.

I have also attached a diagram showing the changed position of Church Norton Spit between our first and current planning application. The background photo and yellow outline were in 2015 and the red outline of the Church Norton Spit and Pagham Spit in 2021. As you can see significant erosion has occurred including the threat to Pagham Lagoon (top centre) and breach into the Small Lagoon (left centre). There is an extensive range of photos covering the past few years in the Pagham Beach album on Google Photos - press this link:

Please get back to me if you need more information. The PCIAG members are here to help expedite this application.

Many thanks
Robin

----- Forwarded message -----

From: **Robin Henderson**
Date: Wed, 17 Feb 2021 at 13:50
Subject: PCIAG members meeting and preparations
To:

Dear PCIAG Member,

I am re-sending my earlier email as I forgot to enter the subject, therefore may be rejected by some email systems.

The Pagham Coastal Issues Advisory Focus Group met on 12th February 2021 to discuss the latest coastal developments and elevated level of concern emanating from the community. Discussion focused around the most recent developments with medium-term discussions temporarily suspended. The outcome of the meeting can be summarised as follows;

1. Arun DC will continue to respond in appropriate manner to address the coastal erosion that is impacting East Front Road. The latest scheme was carried out proactively offering additional protection to those worst affected. The beach was subjected to long period waves which, unlike short period waves, store more kinetic energy and occur as a result of distant storms. Thus, the long period waves were not accompanied by poor weather or strong winds ("typical" storm conditions).
2. The Environment Agency will draft an emergency plan detailing how the organisation will respond to the risk of flooding through spit proximity (breaching into Pagham Lagoon).
3. The Environment Agency will investigate options eligible for central government funding utilising and building on the work that has been carried out by Arun District Council. PCIAG believes that this will not generate additional government funding.
4. PCIAG opined that it is now an appropriate time to progress a community led Planning Application and would encourage this action. The application would address potential property loss and future flood risk; PCIAG would offer support where appropriate.

I am now looking at organising the next PCiAG Members Meeting to review and discuss the above points and the next steps required. I will be sending out a Doodle Poll for the next meeting. As Nick Gibb would like to attend, these dates will be based around Friday's over the next 3 weeks.

Regards
Robin Henderson

--

Pagham Coastal Issues Advisory Group