

Arun District Council
Development Control
1 Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2015/117737/01-L01
Your ref: P/97/15/PL
Date: 18 January 2016

Dear Sir/Madam

MANAGED BREACH OF SHINGLE SPIT & BLOCKING OF ADJACENT TIDAL INLET CHANNEL WITH SHINGLE BARRIER. FORMATION OF SHINGLE ISLAND WITHIN HARBOUR FOLLOWING EXCAVATION OF ADJACENT AREA OF SPIT. CHURCH NORTON SPIT PAGHAM BEACH PAGHAM PO21 4NJ

Thank you for your consultation on this proposal. Please quote our reference number in any correspondence.

A sustainable approach to shoreline management is a welcome ideal in principle. By its nature this is a complex application and whilst with regards to issues in our remit we do not object to the scheme, we do have some concerns regarding the future geomorphology of Pagham Harbour following the breach and how this might impact upon resident flora and fauna, due to a change in tidal levels and flow regimes. With this in mind we support the position of Natural England which reflects their statutory responsibilities.

Environment Agency Position

Having viewed the application details and supporting documents we have no objection to the proposed works as long as the following condition is observed.

Condition

Works must be undertaken outside of the bathing water season, which runs from 15 May to the end of September each year. This is in accordance with the method statement provided in the application (in table H2 of the appended WFD assessment). This will ensure that any sediment dispersal occurs outside of the bathing water season and will protect bathing water standards at Pagham Bathing Water.

Advice

We would expect that all works are undertaken following current best practice and with

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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minimum impact on water quality. We would advise the applicant to adhere to the Environment Agency's Pollution Prevention Guidance (PPG) 5 for works in or near watercourses. In the event of a pollution incident, all works should cease immediately and the Environment Agency should be contacted via the incident hotline 0800 807060.

Justification

The proposed works are located within the Sussex WFD water body and in the vicinity of the Pagham Harbour WFD water body. They are also within 2km of the Pagham Bathing Water Protected Area. We have assessed this proposal against the "no deterioration" requirements of the WFD, which included an assessment of the works' potential for impacts on the status of WFD quality elements, specific pollutants, priority substances and protected areas (e.g. Bathing Water Protected Areas). Our conclusion is that the works are unlikely to have a significant impact on the current status of the water body if they are undertaken in accordance with the above condition.

Informatives

Biodiversity

We are happy to defer to the recommendations of Natural England regarding the working methodologies and access routes agreed that will ensure the protection of areas of vegetated shingle; and with regard timing of works to avoid disturbance to protected bird species. The relevant pollution prevention measures should also be in place for the entirety of works.

Flood Risk

After reviewing the documentation we are satisfied that whilst in some locations there may be a negligible change in flow speeds and water levels the proposal will not increase flood risk elsewhere.

Advice to Applicant

We would wish to advise the applicant in subsequent applications, such as securing funding from the Environment Agency, they will be required to complete a thorough options appraisal, explaining the planned benefits and outcomes of the project. Appraising alternative options is an important part of the process to enable an informed decision to be made. This must take into account the implications of alternative solutions on the different issues the Environment Agency have a responsibility for. All applications for Flood and Coastal Erosion Grant in Aid are assessed by our National Project Assurance Service (NPAS) who provide advice to project teams and recommend projects to the EA board for approval. This is to ensure we get the most out of the money we invest in projects and programmes and to make sure that Government guidelines on options appraisal are followed correctly. The allocation of funding for schemes is prioritised and agreed nationally following set guidelines. The applicant has already been made aware of these steps.

Yours faithfully

Mr Jamie Fielding
Sustainable Places Team Leader

