Brighton Marina to River Adur Coastal FCERMS

Planning, Design and Access Statement (incorporating Statement of Community Involvement and Sustainability Statement)

Final

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Contract

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Purpose

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Abbreviations

ADC	Adur District Council
ALP	Adur Local Plan
BHCC	Brighton and Hove City Council
BHSBSMP	Beachy Head to Selsey Bill Shore Management Plan
BHWMCZ	Beachy Head West Marine Conservation Zone
BNG	Biodiversity Net Gain
BPM	Best Practicable Means
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
EA	Environment Agency
EDS	Ecological Design Strategy
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
EMP	Ecological Management Plan
FCERM	Flood and Coastal Erosion Risk Management Strategy
FRA	Flood Risk Assessment
GPDO	General Permitted Development Order
HPI	Habitats of Principal Importance
HRA	Habitats Regulation Assessment.
LFRMS	Local Flood Risk Management Strategy
LPA	Local Planning Authority
LVA	Landscape and Visual Assessment
LWS	Local Wildlife Site
MMO	Marine Management Organisation
NPPF	National Planning Policy Framework
PCCPS	Planning and Climate Change Position Statement
PPG	Planning Practice Guidance
PROW	Public Right of Way
SDSMP	South Downs Shoreline Management Plan
SHFRMG	Shoreham Harbour Flood Risk Management Guide
SHJAAP	Shoreham Harbour Joint Area Action Plan
SHRA	Shoreham Harbour Regeneration Area
SISOMP	South Inshore and South Offshore Marine Plan
SPA	Shoreham Port Authority
SPM	Shoreham Port Masterplan
SSGN	Sustainability Statements Guidance Note
SS	Sustainability Statement
TLC	The Living Coast
TSSH	Transport Strategy for Shoreham Harbour
WFD	Water Framework Directive

WSCC	West Sussex County Council

1 Introduction

1.1 Context

JBA Consulting (JBA) has been commissioned by Brighton and Hove City Council (BHCC) to prepare a Planning, Design and Access Statement to support a full planning application for proposed rock revetments adjacent to Basin Road South, Shoreham frontage. One rock revetment is located within the boundary of Adur District Council (ADC) and the other rock revetment is located within the boundary of BHCC. As a result, planning applications have been submitted to both Local Planning Authorities (LPAs).

The proposed rock revetments are part of a wider package of coastal defence works situated in between Brighton Marina and Shoreham Port (River Adur), known as the Brighton Marina to River Adur Flood and Coastal Erosion Risk Management Strategy (FCERM). Some of the works as part of the FCERM are either Permitted Development under the General Permitted Development Order (GPDO) or do not constitute development. The Environmental Impact Assessment (EIA) process (covered in more detail below) has considered the wider package of works as a whole.

1.2 Purpose of this report

This Planning, Design and Access Statement and Statement of Community Involvement forms part of the planning application submission for full planning permission. It provides details of the proposals in relation to the sites, setting, design and access arrangements. It assesses the proposals against the relevant planning policies and other material considerations. This statement should be read in conjunction with the documents and drawings submitted as part of the planning application.

2 Development Site

2.1 Location

Both sites are located along the southern, beach side of the Southwick Ship Canal. The site subject to this planning application is wholly located within the boundary of ADC and is located at the back of Southwick Beach adjacent to Basin Road South (Grid Reference: 525033, 104726). The site is located within a predominantly industrial area within Shoreham Port.



Figure 1-1: Proposed development site and potential site compounds

3 Proposed Development

3.1 Background

The open coast frontage between the River Adur and Brighton Marina is at risk of flooding from wave overtopping.

There are significant erosive forces at the Shoreham end of the frontage. There is a natural drift of sediment along the South Coast, Brighton included, from west to east. The supply of natural sediment drift material to the Shoreham frontage is impeded by the mouth of the River Adur and associated walls. Limited sediment supply, coupled with wave action, has resulted in significant erosive forces at the western end of the frontage. As a result, the residual life of the existing defences is inadequate. The open coast frontage is also at risk of flooding from wave overtopping due to a combination of significant variations in defence heights and beach widths and deterioration of defence assets.

The shingle beach along the frontage provides the main form of coastal defence and is controlled by a series of timber, rock, masonry and concrete groynes. Historic storm events have previously led to flooding of commercial premises and properties along Brighton seafront and on adjacent roads. Emergency repair works have been undertaken to repair breaches in seawalls and some structures, but many remain in a collapsed or partially collapsed condition. There are significant variations in defence heights and beach widths along the frontage which have resulted in a number of weak points susceptible to flooding. Deteriorated and aged assets along the frontage have resulted in a poorly controlled beach susceptible to significant storm draw down and breach risk.

3.2 Description

The proposed scheme aims to achieve a consistent standard of protection along the coastal frontage (in six locations) to reduce the risk of coastal erosion and coastal flooding through the refurbishment of existing defence assets where required, and the construction of new assets. Consequently, it will provide material benefits by reducing erosion and flood risk to people, property and the environment. This will include protection for 8 residential and 73 commercial properties (including Shoreham Sewage Pumping Station and Shoreham Power Station), and reduction in flood risk for a further 6 residential and 8 commercial properties.

The proposed scheme entails works at each of the six locations, however, planning permission is only being sought for the construction of two rock armour revetments in Area 2 (within the ADC boundary) and Area 4 (within the BHCC boundary), along with a footpath, access ramp and steps in Area 2 only. All other parts of the proposed scheme are permitted development. A summary of the works proposed in each location is outlined below.

3.2.1 Planning Permission – Adur District

Area 2: Construction of a new rock revetment along the existing defences along the central Shoreham frontage facing Basin Road South. The proposed alignment follows the seaward perimeter of the existing beach crest. Construction of a new footpath along the top of the existing sheet piles, along with a new beach access ramp and steps. The rock revetment within Adur would span an area of approximately 740 metres in length, between 8.6 and 11.8 metres in depth and ranging from 2 to 3 metres in height from toe to crest. The footpath would be approximately 3 metres wide and approximately 545 metres in length.

3.2.2 Permitted Development – Adur District

Area 1: Construction of new concrete upstand flood wall along the top of the existing sheet pile wall.

Area 2: Replacement of existing timber wall and concrete/timber wall and patching repair to the concrete wall.

Area 7: Beach nourishment through regular recycling undertaken by BHCC.

3.2.3 Construction Programme

Works will be undertaken over an approximate 10 year period. It is proposed that the rock armour revetment will be constructed in 2023. Rock used for the revetment would be delivered from the Lydd Ranges Sea Defence scheme (in Lydd, Kent, approximately 40 miles from the site) either by barge or by road. Any additional rock required would be imported and delivered by road.

4 Statement of Community Involvement

4.1 Consultee Engagement

4.1.1 Marine Management Organisation (MMO)

The MMO have confirmed in 2022 that the works are not EIA development under the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended). An application for a Marine Licence for the rock revetments is due to be submitted at the same time as this planning application.

A Marine Licence has already been obtained (granted in October 2022) for the delivery of rock from Lydd Ranges to the site by barge, should that option be chosen (ref. MLA/2022/00089).

4.2 Other Engagement

An information session and workshop took place with occupiers of Western Esplanade and Hove Deep Sea Anglers Club in May and July 2022.

4.3 Pre-application discussions

Discussions took place with officers of ADC and BHCC in May 2022 in the form of a Teams meeting. The main issues discussed were:

- The need to cover noise and dust impacts in a Construction Management Plan.
- Whilst a full Landscape and Visual Impact Assessment (LVIA) would not be required, photomontages would be useful to illustrate the proposals.
- Local Plan policies require Biodiversity Net Gain (BNG).
- Flood Risk Assessment (FRA) to be submitted.
- Agreed site locations would not have any Habitats Regulation Assessment (HRA) implications.
- MMO would advise on fish sensitive seasons.
- Planning applications to be submitted to each local authority. Agreed that the same assessment work could be used for both planning applications.
- Site locations unlikely to affect any heritage assets.

Further e-mail correspondence was carried out with ADC in November 2022 in relation to the details of the footpath, ramp and access steps and BNG. It was concluded that the final details of the footpath, ramp and access steps could be subject to a planning condition.

Various discussions were undertaken with the Brighton and Hove City Council Biodiversity Officer and the East Sussex County Ecologist between July 2022 and December 2022 to discuss issues relating to the loss of coastal vegetated shingle and challenges associated with the identification of suitable areas to delivery compensation at a ratio of 8:1, as advised by the East Sussex County Ecologist. After an extensive search for suitable locations, two proposed locations for the delivery of compensatory coastal vegetated shingle were identified and agreed.

A meeting was also held with the Brighton and Hove City Council Biodiversity Officer and East Sussex County Ecologist in December 2022 to discuss issues relating to the quantification of biodiversity net gain for the proposed scheme. During this meeting, it was agreed that there were only two options to deliver Biodiversity Net Gain on this scheme and this would be through enhancement of existing linear or vertical urban features (creation of green walls or green walls). It was agreed that other than greening the grey of existing

urban features, or off-setting through an off-setting provider, there were no other suitable sites for the provision of suitable BNG opportunities.

5 Planning History

5.1 EIA Screening

An EIA screening opinion request in relation to the wider scheme was submitted to both ADC and BHCC on 11 March 2022. Screening opinions confirming that the wider scheme did not constitute EIA development were issued by BHCC on 24 March 2022 and by ADC on 16 June 2022.

6 Planning Policy Context

6.1 National Planning Policy

National Planning Policy Framework (NPPF)

The National Planning Policy Framework was revised on 20 July 2021. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019. The National Planning Policy Framework sets out the vision for sustainable development based on inter-dependent economic, social and environmental roles, of which protecting and enhancing the natural, built and historic environmental is one element. The NPPF sets tests for protecting people and property from flooding which all local planning authorities are expected to follow, and for protecting the environment.

Chapter 14 - Meeting the challenge of climate change, flooding and Coastal Change - indicates that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, stating that it should help to minimise vulnerability and improve resilience.

Paragraph 167 (of chapter 14) states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.

Chapter 15 - Conserving and enhancing the natural habitat sets out ways that planning policies and decisions should protect and enhance the natural and local environment.

Paragraph 174 (of Chapter 15) states that planning policies and decisions should contribute to and enhance the natural and local environment.

Paragraph 180 (of Chapter 15) outlines that when determining planning applications, if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Chapter 16 - Conserving and enhancing the historic environment outlines how planning policies and decisions should consider development that affects the historic environment (including areas of archaeological importance).

Paragraph 194 (of chapter 15) indicates that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 202 (of chapter 15) sets out that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Planning Practice Guidance (PPG) (as amended)

In March 2014, the former Department for Communities and Local Government (DCLG) now Department for Levelling Up Housing and Communities (DLUHC), launched the Planning Practice Guidance (PPG) web-based resource. The PPG has been periodically updated since then and contains important information for users of the planning system that was previously published in separate documents and guidance notes, supporting and linking in with the provisions of the NPPF. This includes guidance on design, flood risk, the historic environment, land affected by contamination and the natural environment and noise.

6.2 Local Planning Policy

Adur Local Plan

The Adur Local Plan (ALP) was adopted in December 2017 and is the development plan for the purposes of determining planning applications. A review has indicated that it is necessary to update the ALP and this has commenced, although not proposed to be completed until late 2023. One of the key strategic issues for the ALP is the need to address climate change and flood risk – given the coastal location of the district, the risk of flooding is a serious issue. Part V9 of the Vision and Objectives of the ALP sets out that by 2032, flood risk will have been minimised and/or mitigated through (amongst other things) investment in flood defences. Objective 11 (O11) is to ensure that where feasible, new flood defences and other measures to reduce flood risk should take the form of ecologically sustainable solutions.

Policy 1: Sustainable Development, reflects the approach of the NPPF with the presumption in favour of sustainable development.

The site is located within the Shoreham Harbour Regeneration Area (SHRA) (Southwick and Portslade Beaches - Character Area 4), covered under Policy 8 of the ALP. This policy requires new development in the SHRA to meet high standards of environmental efficiency and a Sustainability Statement (SS) will be required as supporting information to accompany all development proposals. The SS should be set out in accordance with the Sustainability Statements Guidance Note (SSGN) for SHRA. The policy also sets out a number of factors to be considered in regard to new development within the SHRA of which the relevant ones are; to protect and enhance the area's important environmental assets and wildlife habitats; contribute to the delivery of measures set out in the Transport Strategy for Shoreham Harbour (TSSH). Within Character Area 4, the priorities are to seek improvements to the quality, access, appearance and maintenance of the Public Right of Way (PRoW) corridor, beach promenade, public areas and beach environment.

Other relevant policies within the ALP are as follows:

- Policy 13: Adur's Countryside and Coast – the site is located outside the Built Up Area Boundary, and this policy sets out that development in this type of location will only be permitted where it is for (amongst other criteria) flood management. The landscape character of Adur and the coast will be protected and where possible enhanced.
- Policy 15: Quality of the Built Environment and Public Realm – requiring development to enhance the character of the site and the prevailing character of the area including through respecting the natural features of the site and contribute positively to biodiversity.
- Policy 31: Biodiversity – requiring all development to ensure the protection, conservation, and where possible, enhancement of biodiversity. If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused.
- Policy 34: Pollution and Contamination – development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment, including nature conservation interests and the water environment.
- Policy 36: Flood Risk and Sustainable Drainage – requires the submission of flood risk assessments in certain circumstances (following policy and guidance in the NPPF and PPG).

6.2.1 Area Action Plan

The site is located within the area of the SHJAAP. The SHJAAP was adopted by ADC along with BHCC and West Sussex County Council (WSCC) in October 2019 and comprises a partnership between the local authorities and Shoreham Port Authority (SPA). The SHJAAP forms part of the development plan for ADC and sets the strategic development and land-use priorities for the SHRA up to 2032 and contains the policies against which development management decisions within that area will be made.

The vision for the SHJAAP sets out that the redevelopment of key areas of the SHRA will help to deliver critical infrastructure that will help to respond positively to climate change.

Objective 6 of the SHJAPP seeks to reduce the risk of flooding and adapt to climate change and to ensure that appropriate and comprehensive flood infrastructure is delivered.

Objective 7 of the SHJAAP relates to the natural environment, biodiversity and green infrastructure and seeks to conserve and protect the area's important environmental assets, wildlife habitats and ecosystem services and to enhance the biodiversity of the area by creating new habitats.

Objective 9 of the SHJAAP relates to place making and design quality and seeks new development to promote high design quality and respect local character and form.

In terms of area wide policies within the SHJAAP, policy SH1 requires a Sustainability Statement to accompany all development proposals within Adur.

Other relevant policies in the SHJAAP are as follows:

- Policy SH6 (Flood risk and sustainable drainage) sets out support for the delivery of measures to mitigate flood risk and coastal erosion, requires development proposals to comply with the principles and approach to flood risk management set out in the Shoreham Harbour Flood Risk Management Guide (SHFRMG) and sets out requirements for site specific FRA.
- Policy SH7 (Natural environment, biodiversity and green infrastructure) sets out the requirement to deliver an improved green infrastructure network comprising Portslade and Southwick Beaches including coastal vegetate shingle habitat creation, ensure no net loss and seek to provide a net gain to biodiversity and identify appropriate mitigation. Where impacts on biodiversity cannot be avoided or mitigated, compensatory actions will be required. Particular consideration will be required to noise from construction sites and to demonstrate that waste will be minimised during the construction phase.
- Policy SH9 (Place making and design quality) promotes high design quality and requires scheme design to reflect the character of the marine environment and to be sensitive to views of the waterfront and surrounding landscape.

In regard to character area proposals in the SHJAAP (policy CA4), the site is located within Character Area 4 (Portslade and Southwick Beaches). Within this area, the relevant priorities in policy CA4 are to:

- Safeguard beach areas for coastal processes.
- Enhancement and creation of vegetated shingle habitats to create a continuous corridor along the beaches with compensatory habitat creation if necessary.

6.2.2 Supplementary Planning Documents

Shoreham Harbour Flood Risk Management Guide (SHFRMG) Supplementary Planning Document (SPD) was approved in September 2015 and although produced in advance, still

forms part of the ALP. The SPD has been developed to ensure a consistent approach to flood defence infrastructure in the SHJAAP area and a guide to delivering integrated flood defence and mitigation measures.

The SPD makes reference to coastal defence works between Brighton Marina and the River Adur (Brighton Marina to River Adur Strategy) including the proposed rock revetments which is supported by the partnership of the SHJAAP.

6.3 Other policies and guidance

- Brighton and Lewes Biosphere Reserve (The Living Coast - TLC) is a UNESCO World Biosphere Region (designated in 2014) and the proposed development is located within it. The management strategy for TLC includes strategic themes covering Urban Greening (including supporting and promoting opportunities to improve vegetated shingle) and Climate Change and Carbon.
- Adur Planning and Climate Change Position Statement (PCCPS) (November 2019) provides guidance on the relevant planning policies which must be taken into account when formulating development proposals and guide the decision making process.
- South Inshore and South Offshore Marine Plan (SISOMP) (July 2018). All public authorities are responsible for applying the SISOMP through decisions that they make using existing regulatory and decision-making processes.
- Beachy Head to Selsey Bill Shoreline Management Plan (BHSBSMP) (2006). Policy Unit 4d13 (Shoreham Harbour) of the plan covers the application site. The preferred policies in this area are to continue defending the sea frontage through maintaining, replacing and upgrading structures and by providing new defences between these.
- Shoreham Port Masterplan (SPM) (updated 2022). This includes investing in infrastructure.
- South Downs Shoreline Management Plan (SDSMP) (2018). This sets out a strategic approach for managing the coastline from coastal flooding and erosion risk. For the short to medium term (the next 50 years), the SDSMP advises a Hold the Line approach, managing and sustaining the current defences to limit the impact of coastal processes.
- Local Flood Risk Management Strategy (LFRMS) for West Sussex (2013). The LFRMS is currently being updated but has not yet been published. Therefore the 2013 version is the most recent, despite covering the period 2013-2018.

7 Planning Policy Review and Material Planning Considerations

7.1 Principle of Development

There is widespread policy support for the improvement of coastal defences in this area. Both the Beachy Head to Selsey Bill and South Downs Shoreline Management Plans require the continued defence of the sea frontage through upgraded and new defences. The SHJAAP requires appropriate flood infrastructure to be delivered. In addition, the SHFRMG SPD gives specific support for rock revetments in this location.

The site is located within Adur's Countryside and Coast under policy 13 of the ALP. Whilst this policy generally restricts development, flood management development is an exception.

Given the above, it is considered that the principle of the proposed development is acceptable and in accordance with the relevant Development Plan and other policies.

7.2 Ecology and Biodiversity

An Ecological Impact Assessment (EcIA) has been carried out for the site and is submitted with this application. Survey work was undertaken in June 2022 and updated in October 2022. An updated site walkover was carried out in November 2022.

For the proposed rock revetment works, footpath and steps within the ADC area, the EcIA has calculated that the proposal would result in the loss of 0.08ha of shingle beach and 0.07ha of poor condition coastal vegetated shingle.

For the proposed rock revetment works within the BHCC area, these would be located within the Basin Road South Local Wildlife Site (LWS). The EcIA has calculated that there would be a loss of 0.03ha of coastal vegetated shingle.

As a result of the above, a number of compensatory measures are proposed. The loss will be compensated at an 8-1 ratio at the following locations:

- Creation of 0.9ha of new coastal vegetated shingle, located to the west of Basin Road South LWS (within BHCC area).
- The retained beach and coastal vegetated shingle (0.22 ha) will be enhanced to moderate condition.
- Mitigation and protection measures are proposed and are set out within the EcIA, Ecological Design Strategy (EDS) and Ecological Management Plan (EMP).
- In addition, BNG has been calculated using the Defra Biodiversity Metric 3.1 calculator. To provide BNG, ecological enhancements are proposed to the existing concrete sea defence wall on Basin Road South to create a Biodiversity Living Wall. The existing concrete sea defence wall is devoid of any vegetation and provides no ecological value or opportunities for biodiversity. The wall is within an industrial urban coastal locality and the surrounding landscape is dominated by commercial buildings, sealed surfaces, shingle beach and the English Channel.

The Defra Biodiversity Metric (3.1) fails to recognise the ecological value or importance of such walls and awards very low BNG (0.5 habitat units). Subsequently, habitat losses (coastal vegetated shingle and shingle beach) and gains for the proposals (compensation of coastal vegetated shingle at an 8:1 ratio and the creation of the Biodiversity Living Wall) have been calculated as a -0.12% BNG loss.

However, in accordance with Principle 6 of Biodiversity Net Gain: Good practice principles for development by the Chartered Institute of Ecology and Environmental Management (CIEEM), ecological expertise has been applied to "achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to

make clearly justified choices." Creation of new habitats on-site were considered to be ecologically more valuable for biodiversity at a local level, compared to using the metric to deliver off-site quantifiable BNG through an off-site provider. This would have provided no ecological benefits for the local area.

Monitoring and maintenance of the compensation, enhancement and BNG measures are proposed in the EMP. The total compensatory vegetated shingle will be managed and monitored for 30 years post construction in accordance with the BNG Metric 3.1 – Technical Supplement. Annual surveys of the coastal vegetated shingle will be undertaken for the first five years post construction to ensure the habitat becomes established. After the first five years, surveys will be carried out every five years. The Biodiversity Living Wall will also be used to collect biological data as part of a research project.

Given the above, whilst the proposals will not fit the Defra Biodiversity Metric (3.1), they will still enable the provision of BNG, particularly in relation to vegetated coastal shingle. As a result, the proposals will be in accordance with policies 15 and 31 of the ALP, Objective 7 and policies SH7 and CA4 of the SHJAAP. In addition, the proposals will accord with the management strategy of TLC.

7.3 Landscape and Visual

A Landscape and Visual Assessment (LVA) has been undertaken and is submitted with this application. The landscape context to the proposed scheme is a highly industrialised, working port. The urban area to the north of this is primarily residential, although directly facing the port there are mainly employment land uses.

Shoreham Port is currently protected by a mix of defences at the interface with the beach, including steel sheet piles with concrete cap, as well as timber groynes controlling shingle movement and rock revetments. Basin Road South, which runs the length of the port is used by walkers and cyclists as part of defined public rights of way and cycleways. To the west, there is a promenade to the south of the road that is retained by the sea wall. Here, a café, and public seating allows for further opportunities to make recreational use of the coastline.

From Basin Road South, the promenade and beach, there are open views to the sea. Views also extend along the coastline, with glimpses of nearby settlements in the distance. However, the visibility of the beach itself varies due to the presence of existing structures.

The proposed scheme would result in localised change to the character of the beachscape at Shoreham Port, through the addition of further lengths of large, robust stone, as well as sheet piling and additional railings and fencing. However, this change is to be considered against the substantial changes to the area that might otherwise be expected to occur in association with changes in climate and ongoing natural erosion, should no reinforcement of the existing defences be provided.

The proposed scheme makes use of structures and materials that are already present within the beachscape at Shoreham Port. Therefore, the character of the area is not expected to substantially change.

Views to the new structures would be localised and are not predicted to noticeably alter or limit views along the shore or towards the sea. The skyline is not predicted to be notably changed in views, given that the rock revetments would sit at beach level and would predominantly be located below the level of the port and Basin Road South.

The LVA concludes that no substantive landscape or visual effects are predicted. As a result, the proposal would not conflict with policies 8, 13 and 15 of the ALP, objective 9 of the SHJAAP and policy SH9 of the SHJAAP.

7.4 Flood Risk

A Flood Risk Assessment (FRA) has been undertaken and submitted with this planning application. The FRA has been carried out with reference to the PPG and has considered the following:

- Whether the site is at significant risk from any forms of flooding.
- The risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed so that the development remains safe throughout its lifetime, taking climate change into account.
- If the site is at risk of flooding, determine if safe access to and from the site will be maintained during an extreme flood event.
- The impact of the development on flood risk elsewhere with particular focus on the effects of surface water runoff from the site.

The site is located in Flood Zone 3 and therefore at significant risk of flooding. The site is also at risk of wave overtopping in extreme weather events. As the proposed rock revetments would allow water to flow through them and back into the sea, there is unlikely to be an increased flood risk by their implementation. Tidal flood risk has been identified as a potential concern for construction compounds which are required to be located near to the site. However, with appropriate mitigation measures, the risk of flooding to people working on site and within the compounds can be managed.

The FRA also makes a number of recommendations as follows:

- Compound areas should not be located in places that could block the current drainage infrastructure in case of surface runoff from wave overtopping.
- Construction managers and at least one person on site should be signed up for the EA automated flood warnings and alerts. There should be awareness of tidal conditions for people on site.
- Development of a flood response plan. This should include an evacuation plan.

7.4.1 Exception test

The PPG sets out that flood control infrastructure is water-compatible development which is appropriate within Flood Zone 3 with no Exception Test required.

7.4.2 Sequential test

The proposal is for flood risk infrastructure that is designed to reduce flood risk. As such, it is required to be located in an area of high flood risk. The proposal does not involve new development that members of the public would visit. It is therefore considered that there would be no more suitable sites for this.

In regard to the construction compounds, it is not considered that these should be subject to sequential or exception tests in accordance with Paragraph 168 (and footnote 56) of the NPPF.

Given the above, the proposal would be in a high flood risk location. An FRA has been prepared in accordance with policy 36 of the ALP and the PPG. In regard to the proposed rock revetments, these would be water-compatible development which is required to be in this location and there are no sequentially preferable places. As the rock revetments would allow water to flow through them and back into the sea, it is not considered that there would be an increase in flood risk elsewhere. In regard to the compound areas, it is not considered that they would lead to flood risk elsewhere and would have safe access and egress, subject to the FRA recommendations being implemented. The proposal would therefore not conflict with policy 36 of the ALP and policy SH6 of the SHJAAP.

7.5 Footpath access

The proposal also incorporates a footpath and access steps and ramp from the beach. The footpath would run alongside the rock revetment and link into Basin Road South at each end. The footpath would provide a visually attractive alternative route to the footpath running alongside Basin Road South on a non-trafficked route as part of the England Coast Path.

Whilst the precise design and location of the access steps and ramp have not yet been determined, it is considered that a planning condition could be imposed requiring final details of this to be approved.

It is considered that the provision of this footpath and access steps/ramp would help meet the objectives of Policy 8 of the ALP covering Character Area 4 of the SHRA by making improvements to the PRoW corridor.

7.6 Construction

An outline Construction Environmental Management Plan (CEMP) has been submitted with this application.

It is expected that the installation of the rock revetment would take just over 2 weeks. The CEMP sets out the construction activities proposed along with an indicative timeframe.

In regard to traffic management, the contractor will be required to provide a detailed traffic management plan to ensure that construction is organised in a manner that reduces any impacts on local roads, local amenity and the wider highway network. In any event, one-way HGV trips are unlikely to exceed 18 per working day and it is not considered that this level of trips would lead to significant HGV movements.

In regard to noise, vibration, air quality and dust best practicable means (BPM) are set out in the CEMP to minimise these during construction.

Other environmental protection measures during construction are set out in relation to water resources and flood risk, archaeology, ground conditions, contamination and hazardous materials, and waste materials and storage.

Given the above, the construction activities will have the potential to impact on the environment, local amenity, roads and the wider highway network. However, given the construction control measures that are proposed in the CEMP, the relatively low traffic movements, the short construction period and the predominantly industrial nature of the area (where the impacts described above would be reasonably expected), it is not considered that there would be an unacceptable adverse impact on the environment, local amenity, roads and the wider highway network. As a result, the proposal would not conflict with policies 8 and 34 of the ALP.

8 Sustainability Statement

8.1 General

This Sustainability Statement (SS) has been done in accordance with the Sustainability Statements Guidance Note (SSGN) for the SHRA dated July 2013.

8.2 Building standards

No building standards are applicable to this proposal given that it does not involve the provision of new buildings.

8.3 Energy

An assessment of the CO2 emissions for the proposal is being carried out separately.

8.4 Passive Design

Passive Design is not relevant to this proposal as it does not involve the provision of new buildings and internal rooms.

8.5 Low and Zero-Carbon Energy Technologies

Given the nature of the proposal, it is not possible to implement these technologies.

8.6 Materials

The rocks to be used for the revetment have been sourced to be as local as possible. A separate assessment is being carried out for the estimated embodied CO2 for the construction of the development.

8.7 Flood risk

An FRA has been submitted with this planning application. The purpose of the proposal is to protect 8 residential and 73 commercial properties (including Shoreham Sewage Pumping Station and Shoreham Power Station) from flooding and reduce flood risk for a further 6 residential and 8 commercial properties.

There are no sequentially preferable sites for the proposal as it is required in this particular location in order to offer protection from flooding and reduce flood risk.

The proposal would be flood resilient and resistant, and water-compatible and safe for its lifetime. As the rock revetments would allow water to flow through them and back into the sea, it is not considered that there would be an increase in flood risk elsewhere.

8.8 Water

In regard to water efficiency and quality and the recycling, harvesting and conservation of water resources, it is not considered that these would be relevant to the proposals. However, the permeable nature of the revetment would minimise any surface-water run-off.

8.9 Public Realm

The proposed footpath would provide an attractive, alternative route to the existing footpath along Basin Road South and would be designed to be used by a variety of people.

8.10 Open Space

The provision of open space is not considered to be relevant to this proposal.

8.11 Greening

The proposal would provide an overall increased amount and improved condition of coastal vegetated shingle. In addition, a Biodiversity Living Wall would be provided. It is considered that this would greatly improve the site surroundings.

8.12 Biodiversity

An EcIA has been carried out for the site and is submitted with this application. Survey work was undertaken in June 2022 and updated in October 2022. An updated site walkover was carried out in November 2022. In addition, an EDS and EMP have been undertaken along with a BNG calculation in accordance with the Defra Biodiversity Metric 3.1 calculator.

Overall, the proposal will result in a BNG, particularly through an overall increased amount and improved condition of coastal vegetated shingle and the provision of a Biodiversity Living Wall.

8.13 Transport

Given the nature of the proposed development, it will not generate transport movements during its lifetime. The only transport movements that will be made will be in its construction and due to the expected low level of movements and short construction period will not require a Transport Statement or Travel Plan to be undertaken. In terms of access for construction workers, the site is located in relatively short walking distance (0.7 mile – 13 min) on a safe, accessible route, from bus stops (and a regular bus service) on Albion Street (A259) and Southwick Railway Station (0.8 mile – 16 min).

8.14 Pedestrians, cyclists and other users

Whilst most of the requirements are not applicable to this proposal, the proposed footpath would be a benefit to pedestrians, cyclists and other users.

8.15 Parking

Due to the nature of the proposal, the provision of car parking during its lifetime is not relevant. However, a construction compound will provide access for construction vehicles.

8.16 Waste

It is not considered that the proposal would generate significant waste during its construction and lifetime.

9 Conclusion

The proposal would have substantial public benefits through the protection of 8 residential and 73 commercial properties (including Shoreham Sewage Pumping Station and Shoreham Power Station) from flooding and the reduction of flood risk for a further 6 residential and 8 commercial properties.

There is widespread policy support for the improvement of coastal defences in this area. Both the Beachy Head to Selsey Bill and South Downs Shoreline Management Plans require the continued defence of the sea frontage through upgraded and new defences. The SHJAAP requires appropriate flood infrastructure to be delivered. In addition, the SHFRMG SPD gives specific support for rock revetments in this location.

The technical assessments that have been prepared in support of the planning application have demonstrated that there will be no adverse impacts on flood risk, amenity, pollution and the landscape and appearance of the area.

In regard to biodiversity, it is acknowledged that the proposal would result in the loss of coastal vegetated shingle. However, new areas of coastal vegetated shingle will be provided and retained areas enhanced. In addition, a Biodiversity Living Wall will be provided. This will provide an overall BNG.

In regard to footpath and steps/ramp, this would provide an attractive alternative route to the footpath along Basin Road South and provide access to the beach.

Given the above, it is considered that the proposals are in accordance with the Development Plan and would deliver substantial public benefits.

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