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From: Ivon Blumer [REDACTED]
Sent: 17 November 2021 12:01
To: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
[REDACTED]
Subject: Re: P/143/21/PL, 25 West Front Road

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Hi Maria

Thank you for your email regarding the new interim framework for planning applications in Pagham.

I assume this application would come under category 3, can you please confirm this would be the case.

I would suggest the following reasons for the above.

- 1) As I would understand it there is no raised level of risk to the foreshore along this part of the beach frontage, as it benefits from a substantial shingle bank.
- 2) The current application is for a 3 bed house (6 person), whilst the existing house has 4 bedrooms (6 person), so occupancy is no greater.
- 3) The floor level is set at more than 300 mm above the predicted flood level, 5.7 AOD.

On the basis that the above is correct, can you please let me know how this application will be determined as we are now close to the determination date with no objections.

Kind regards

Ivon

On 17 Nov 2021, at 11:29, Maria Tomalova <Maria.Tomalova@arun.gov.uk> wrote:

Dear Mr Blumer,

I would like to bring to your attention the new interim framework which would be considered whilst assessing your proposal.

On the 6th October 2021, The Planning Policy Committee agreed a new interim framework for assessing planning applications at Pagham while the implications of Coastal Change Management Area (CCMA) are explored.

The agreed approach:

Category ref. Type	Development Description	Decision
1 development	All new -	Not permitted
2 significantly predictions	All redevelopment – (new structure[s]) Not permitted	Where there is raised level of risk now or in covering the ensuing 5 years No raised level of risk now or in covering the ensuing 5 years and no occupier density
3 predictions	All redevelopment (new structure[s]) Permitted	
AND increase	finished floor levels to be at least 300mm above predicted flood levels in all cases	
4 existing	Reconstruction Permitted	Using substantial portions of the

- fenestration with increased property level building – e.g. re-roofing or
- protection where practicable
- 5 Non-habitable development e.g. garages,
porches, Permitted non-habitable
annexes where otherwise allowed-
conditioned upon continuing
non-habitable status
- 6 Other risk reduction related development
- Permitted where otherwise allowed.

Link to draft minutes - [https://democracy.arun.gov.uk/documents/g1458/Printed minutes 06th-Oct-2021 18.00 Planning Policy Committee.pdf?T=1](https://democracy.arun.gov.uk/documents/g1458/Printed%20minutes%2006th-Oct-2021%2018.00%20Planning%20Policy%20Committee.pdf?T=1)

Link to agenda and report - (Public Pack)Agenda Document for Planning Policy Committee, 06/10/2021 18:00 ([arun.gov.uk](https://democracy.arun.gov.uk))

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 distanced 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

The main body of the spit came within ~150 – 175m and the associated outflow channel came within ~100m. Therefore, It would be inappropriate for me to suggest that another shingle spit could not affect this area in the future. It is the growth, breach and re-distribution process that facilitated the large shingle beach that this section of foreshore now benefits from.

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 and that leads me to question the appropriateness of the development, at this time . Therefore, all development should be considered with this in mind.

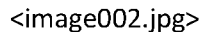
Other general comments that may be of interest to the Applicant are as follows:

- 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 Environment Agency flood maps indicate that the proposal is located in close proximity to 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.
- The Environment Agency have produced National Coastal Erosion Risk Mapping. This dataset provides detail on the predicted erosion rates for the short, medium and long term, along with the shoreline management Plan for each epoch. <https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=9cef4a084bbb4954b970cd35b099d94c>
- 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-4qrjWWLpiGmYjWP7idZpJFG/view>
- Living and building on the Coast In Arun <https://www.arun.gov.uk/living-and-building-on-the-coast>
- 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 a link which explains partnership funding in greater detail - <https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding>

Kind regards

Maria

Maria Tomalova
 Senior Planning Officer
 Directorate of Place

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