

20th April 2026

Jane Collins  
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Pagham  
PO21 3ND

**Case Officer:** Mr S Davis  
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Dear Sir/Madam,

**Town & Country Planning Act 1990 (as amended)**  
**Town & Country Planning (Development Management Procedure) (England) Order 2015 - Article 5**

Application No: P/30/26/OUT  
Site Address: Land North of Summer Lane Pagham  
Description of works: Outline application with some matters reserved, except access, for up to 120 No residential dwellings including means of access into the site (not internal roads). This application is a Departure from the Development and affects a Public Right of Way.

Thank you for your internet representation made on 18th April 2026 which has been recorded as an objection with the comments as follows:

OWPC82911

I strongly object to the applications P/30/26/OUT and P/31/26/OUT primarily for the following reasons (my detailed objection letters for each separate application have been posted :-

**Built Up Area Boundary**

The majority of this development lies outside the Built Up Area Boundary, which is not permitted unless it aligns with policies in the Plan referring to a specific use or type of development, none of which are relevant to this proposal. Policy SD SP2 states developments should be concentrated within the BUAB.

The policy also notes that the Council will consider the cumulative impact of development when reviewing planning applications. This development should not be considered in isolation.

This application conflicts with Policies SD SP1 and SC SP2.

**NPPF Paragraphs 170 & 181**

Flood risk encompasses both the likelihood and the potential consequences of flooding from sources such as rivers, the sea, rainfall, rising groundwater, and overloaded sewers or drainage systems.

This concept is central to the presumption in favour of sustainable development, as outlined in Section 14 of the National Planning Policy Framework.

Item 170 states that developments should be made safe for their lifetime without increasing flood risk elsewhere.

Item 181 states that local planning authorities should ensure that flood risk is not increased elsewhere.

The proposal to raise the ground level for the development site is very concerning, as previous ground level raising at Summer Lane led to problems with garden flooding, which, although rectified, remains a cause for concern.

Annex 3 of the NPPF Flood Risk Vulnerability Classification states that caravans, mobile homes, and park homes intended for permanent residential use are highly vulnerable.

Most of this development is located in Flood Zone 1, with low-lying areas in the north central part falling within Flood Zones 2 and 3.

Areas prone to river and sea flooding, especially land within Flood Zones 2 and 3 or areas identified in a Strategic Flood Risk Assessment, are at higher risk. Even land in Flood Zone 1 may be affected if the Environment Agency identifies it as having critical drainage problems.

#### Mill Farm Estate Sea Defence

Mill Farm Estate runs along the western boundary ditch and is low lying. Its site licence required the construction of a bund around the western boundary, at considerable expense, to prevent sea incursion. If this was a licence requirement by Arun Council, it is concerning what measures will be taken for sea defence on the proposed development's side of the bund, and whether these will be sufficient to future-proof the site and prevent flooding elsewhere.

The combination of runoff from the proposed site, poor maintenance of the boundary ditch, inadequate management of the Rife, and additional water from Summer Lane development's balancing ponds, all routed along the same ditch, and through Mill Farm Estate will increase flow towards Pagham Rife in the north unless mitigated by additional flood defences to the west.

The River Lavant Flood Alleviation scheme regularly goes live, if a weather incident occurred as in June 2012, the Pagham Rife would struggle to cope with the increased discharge from this and the multiple other developments, which all appear to require raised development levels.

All relevant surface management plans and flood defence strategies must be considered to mitigate flood risks and improve watercourse quality.

This application conflicts with Policy W DM2.

This is OVERDEVELOPMENT.

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. The website is updated once a day in the evening so it may take up to 24 hours for it appear on there. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to [planning@arun.gov.uk](mailto:planning@arun.gov.uk) and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at :<https://www.arun.gov.uk/what-happens-next>.

Some applications will be determined by the Planning Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/planning-application-search>

Any comments that are received after the agenda has been finalised will be separately reported to the members of the Planning Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



**Neil Crowther**  
**Group Head of Planning**

For details of how the Council will deal with your data please refer to our privacy notices on the website  
<https://www.arun.gov.uk/privacy-policy/>

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.

To register to receive notification of planning applications in your area, please go to  
<https://www1.arun.gov.uk/planning-application-finder>