

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

12 Laurel Drive
Mill Farm Estate
Pagham
PO21 3ND

20 APR 2026

18th April 2026

Dear Sir/Madam

I strongly object to planning application P/31/26/OUT (130 units) for the following reasons:

Agriculture

The proposed development is situated on land currently designated as Grade 2, 2a, and 3a, which local farmers regard as Grade 1. The preservation of this land will provide substantial benefits, including improved flood water retention and enhanced support for biodiversity.

- a. Preservation of this land will have greater benefits in terms of flood water retention and support of biodiversity.

If these developments proceed, valuable food-producing land will be lost. Given the increasing importance of food security, it is vital to protect and enhance existing sources of food supply for future generations. The removal of high-quality agricultural land will reduce food production and employment opportunities in the local area. The cumulative effect of local developments has already had a negative impact on transport and energy usage, which undermines claims of 'sustainable development'. This is overdevelopment on a significant scale, coupled with the loss of prime agricultural land during a period of supply chain uncertainty.

This application conflicts with Policy So DM1.

Flood Risk

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, will increase flow towards Pagham Rife in the north unless mitigated by additional flood defences to the west.

If the River Lavant Flood Alleviation scheme were ever required, as in June 2012, Pagham Rife would struggle to cope with the increased discharge from this and multiple other developments which all appear to require raised development levels. This could worsen flooding across the area, especially along Mill Farm Estate's western boundary.

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.

Surface Water and Sewage

Arun Plan 18 Water

Existing sewage and drainage network

Although Pagham Waste Water Treatment Works has been upgraded, it remains unclear whether the existing sewer pipes can handle the cumulative impact of additional developments—amounting to 350 houses on top of the 1,400 dwellings already planned or built—and whether this was even considered. Recent discharges into the Rife, licensed or not, cannot continue unchecked if the flow permit level is breached. The overall impact could result in runoff entering old surface water sewers that drain directly into sensitive sites such as Pagham Nature Reserve, a habitat of national or international importance. This location is also within a Biodiversity Opportunity Area, and such designations should not be overlooked by developers or local councils.

Fresh Water

There has been no comment from Portsmouth Water about capacity issues with water supply or maintenance and upgrading of existing pipes. This must be addressed.

This application conflicts with Policy W DM1.

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.

Gaps Between Settlements

It is important to maintain the separate identity of Pagham and Selsey. The integrity of this gap will be compromised by the cumulative impact of existing and proposed developments.

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This development is inconsistent with item 7.4.2, which states that gaps outside the Built Up Area Boundary are crucial to the Green Infrastructure Network.

This application conflicts with Policy SD SP3.

Summer Lane Public Right of Way/Cycle Network

Summer Lane (FP100) is a Public Right of Way and should not be used for vehicle access to any part of this development. Policy TDM1 requires new developments to ensure ease of movement, prioritising pedestrian and cycle access to the green infrastructure network. WSCC has indicated that priority at the Summer Lane crossover should be given to pedestrians and cyclists, not vehicles. The play area provided by the previous Summer Lane development will be used by local residents, including unaccompanied children and those from this development. It is therefore essential that vehicles do not access Summer Lane from additional developments to the north and south.

This application is in conflict with Policy TDM1.

We also wish to highlight the poor condition of the roads and the frequent closure of routes due to winter flooding, which increases travel delays for residents commuting from Pagham.

The application is in conflict with T SP1.

Residential Amenity

Developments should not significantly affect residential amenity. The use of Footpath FP100 and FP108 (which runs through Mill Farm Estate) will impact the amenity of residents. Although rules are in place on Mill Farm regarding cycling and unaccompanied children, enforcing them would be difficult. Mill Farm Estate has a predominantly elderly population, and there is concern that increased footfall will lead to potential antisocial and criminal behaviour.

This application conflicts with Policy QE SP1.

NPPF 15 Conserving and Enhancing the Natural Environment

Paragraph 193(b) states that development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development at the proposed location clearly outweigh both its likely impact on the features that make the site of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.

Paragraph 195 notes that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site, unless an appropriate assessment concludes that the plan or project will not adversely affect the integrity of the habitats site.

This is overdevelopment and it is not sustainable.

Yours faithfully



Jane Collins

**Resident and Committee member of the
Mill Farm Estate Residents Association**

From: Elaine Walby on behalf of Planning.Responses
Sent: 21 April 2026 10:30
To: Planning Scanning
Subject: FW:
Attachments: S021001026_2604201438000.pdf

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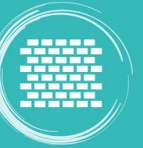
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From: Breezie Allwright <Breezie.Allwright@arun.gov.uk>
Sent: 20 April 2026 15:45
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Subject: Fw:

Rep P/31/26/OUT

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Please note my working days are Monday, Tuesday, Wednesday and Friday.

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From: scanfrompostroom <scanfrompostroom@arun.gov.uk>
Sent: 20 April 2026 15:38

To: Planning <Planning@arun.gov.uk>
Subject: