

The Potting Barn
No.5 Hobbs Court
Bilsham Rd.
Yapton West Sussex BN18 0JY

Planning Reference: Y/32/25PL Redrow Homes Ltd. Planning Application for 170 dwellings for Land West of Bisham Rd. BN18 0LA

**Further Objections to the Redrow Application (2) Y32/25/PL,
Drainage and Flooding**

May26th 2025

Dear Sir,

1. History and Present Drainage Concerns Relevant to The Site

a) The Redrow Homes Ltd. Site, Y/32/25/PL is the same as for Boklok prior, under Y/52/23/PL. Reports from the WSCC FRA and ADC Drainage Engineers were submitted for the latter application previously.

b) They also acknowledged difficulties and concerns regarding water presence at the site. They have not disappeared over time, and are suggested should be included in review again in total now, as part of the objection process.

c) In generality, developers are required to assess the adjacent areas to a proposed planning application development, not just the site itself. In this instance, to include any inherent difficulties that may impact, from water levels/flooding at the Thakeham site to the

immediate North and West, and in relation to other housing in the vicinity.

d) Some site area description plans submitted with the application by Redrow Homes Ltd. allegedly erroneously indicated the area of the developed Thakeham site, as a large 'green space' instead of housing. It is a confusing omission, and in relation to flooding concerns, forms part of this objection.

e) The planning approval for the Thakeham site also included 'run off water' into the Rife. As it continues into the Redrow site, the latter cannot be assessed in isolation, rather than as an integral part of the same watercourse.

f) The Thakeham site contains 250 dwellings (most constructed already). The proposal for the Redrow site is for 170 dwellings. 420 in total for consideration of run-off into the Rife, and potential accumulative flooding in association, is an obvious concern.

g) As the Rife in the whole area is not routinely maintained, it is allegedly impossible to make any conclusive flooding assessment, which does not include the 2 aspects in tandem. I object that this aspect has not allegedly been addressed.

2.The Impact and Outcome of the ADC Planning Committee Meeting on Nov.15th 2023, (the same site as Redrow) to Assess the Boklok Application and In Association with the ADC Drainage Engineers and Odyssey Reports.

a) At the above meeting, (which I attended), the ADC Planning Department alleged that the Drainage Engineers had withdrawn their 'holding' objection to the Odyssey report, submitted on behalf

of the applicant Boklok. But that was not allegedly the entire position, and also forms part of my objection in outcome now.

b) The initial 'holding' objection by the Drainage Engineers, was on the website as of 9/11/2023, which identified that there were allegedly insufficient details supplied by the applicant in the Odyssey report of 24/10/2023 for them to be supported.

c) In alleged contradiction to part of the planning department comments at the meeting, the Drainage Engineers submitted clarifying reports of their position, on the website on Nov. 16th, *after* the ADC Planning Committee meeting, but dated Nov.15th, (the day of the planning meeting), and again on Nov.21st 2023. They confirmed that the Drainage Engineers had removed their holding objection, but did *not* fully support the Odyssey details submitted, as follows:-

d) Para 1 stated: *'I hereby confirm that the additional information supplied in a Technical Note from Odyssey dated Nov.2023 is sufficient to remove the holding objection. This does not constitute a full approval of the submitted details and further information will be required if you are minded to approve the application.*

And continued in emboldened text, **'Please do not include the FRA or Drainage Strategy or any of the Appendices, or Technical Notes as an approved Plan'**.

e) The Drainage Engineers response also included substantial recommendations of *pre-commencement conditions* if the planning application was approved, also requiring submissions and approvals by ADC before any building works on the site. References

were also given particularly under PCENGD2, PCENGD3 and PCENGD4 in the response report.

Also stated as concern, reason regarding the drainage of the site
'To ensure that the proposed development is satisfactorily drained, in accordance with policies W SP1, W DM1, W DM2, and W DM3 of the Arun Local Plan'.

f) Since the ADC Planning Meeting on Nov.15th 2023, no additional information has allegedly been supplied on the website to date by the Drainage Engineers, to counteract, act upon, or countermand those details of concern. That is why they are referred to now, for inclusion into deliberations, and as part of my objection response for consideration.

g) Nor was anything allegedly publicly added on the website by the Drainage Engineers, at the time of the Gov. Inspector Consultation, or at the Appeal Review on Dec.10th 2024.

h) An FRA representative was present at the appeal hearing, but no one from the Drainage Engineers Dept. The Inspector's report referred to the FRA contributions, but not the specific Drainage Engineer concerns above.

3.Details of Concern from the Drainage Engineers ref the Odyssey Report 2023.

a) The first query listed by the Drainage Engineers in their response to details from Odyssey on Nov. 16th 2023, stated: -

(1) 'It was agreed prior to when the planning application was made that due to the ground water levels the use of infiltration methods would not be appropriate. The proposed method of dispersal to a watercourse at a restricted rate is therefore acceptable in principle'

((That does not mean acceptance otherwise)). NB. 'DE' refers to Drainage Engineers as follows.

(2) The 'DE' also indicated that the green field run-off had only been assessed for a drained area as approx. a third of the site, not the whole.

(3) The 'DE' report advised that OWC/permits had not been supplied. The Odyssey response advised that they would only be submitted after any approval. No indication has been given, that these have been supplied by Redrow to the DE at this time.

(4) Also stated; *'That the base of the attenuated basin and cellular tank is located **below** the top of the level of the adjacent watercourse. There is a potential for the watercourse to back up into the basin. Please demonstrate how this will be done'* No satisfactory explanation was allegedly given by Odyssey in response.

(5) Also stated: *'The base of basin S is located below the predicated flood level. Please demonstrate that the basin will remain effective during a flood event'.*

Odyssey allegedly answer 'alternatively' to (4) and (5).

'The surface drainage outfalls are positioned as such to be above the modelled 1 in 5 year or 1 in 10 year flood water level in the water course'.

They also refer to *modelled* flooding possibilities in the area, not allegedly acknowledging the reason for the response request, was the raised level of the Rife to the rest of the site, and that the Rife

regularly overflows its banks into the Lamb's Field annually, not 1 in 5/10.

Currently, surface water drains into the site field, any rise in water table largely keeping pace with *major* flooding. In that way the field site is its own 'natural' flood protection 'basin'. Its removal and intended replacement with a major development and water displacement in outcome allegedly appears to be recognised by the ADC Drainage Engineers but not by Odyssey similarly.

(6) The former also stated '*Groundwater is noted as high. This could result in hydrostatic uplift of the liners that are to be installed to protect them from the ingress of groundwater.*'

They also caution that it may not be possible to excavate to necessary depth to install liners and ballast without adversely affecting other local water factors. They request hydrostatic uplift calculations for SUDS (basins and tank) and countering measures.

In response, Odyssey refer to aspects in the construction process of the basins, not day to day outcomes due to hydrostatic uplift.

(7) The 'DE' report also refers that the freeboard is 300mm, (approx. a foot), has been provided as required by ADC, but that the DCG requirements are more extensive. Odyssey advised that the basins are to be in private maintenance. However, as no RP has been designated to purchase affordable housing to the site, or any other form of 'management' to take it over, and no s106 yet presented by Redrow Homes Ltd., that outcome cannot be confirmed.

(8) The 'DE' report advised of the plans details, indicating overflow routes concerns, over-topping of the basins and requested to know

remediation. Odyssey responded to state that outflows would fall to the topography to the *West* towards the watercourse.

As already confirmed by the 'DE', that the Rife, (watercourse) had already been identified as being higher than the basins, not 'falling to the West', the Odyssey response is allegedly at odds with the statements by the 'DE'.

(9). The DE report queries the Odyssey calculations and requests correct ones for FEH22. The Odyssey response stated that Paul Cann (DE) had accepted the details for FEH13. (but now wished to have later details of reference instead, as allegedly feasible regarding changes over time).

Further details were provided by Odyssey, but do not appear to have been included into other calculations of relevance in association in report now, at time of writing.

(10) The 'DE' referenced Carrier Drains in the Odyssey report, and questioned about permeable areas. The Odyssey response advised that these were intended to be addressed but there were allegedly no specific accompanying drawings submitted in evidence to counter the Engineers concerns at that time.

As an observation comment: Permeable surfaces for roads and pavements may direct run-off water from domestic areas, but at the same time *add* to the water table level below ground, and other attendant excess water difficulties in association.

There is no indication submitted with reference to water *displacement* made by the proposed development itself with regard to flooding.

The Archimedes Principle of Displacement States: ' *That the upwards buoyant force that is exerted on a body immersed in a fluid, whether fully or partially, is equal to the weight of the fluid that the body displaces*'. i.e., the Development, roads, pavements driveways and patios in relation to the water table/levels.

The introduction of a whole development including 'foundations,' (that may also include concrete piles), do not appear to be considered in terms of water displacement effects.

The weight of the displaced fluid can also be assessed mathematically. A simplified calculation indicates the mass of the displaced fluid can be expressed in the density of its volume $m = \rho V$. The fluid displaced has a weight, $W = mg$, where g is acceleration due to gravity. Therefore, the weight of the displaced fluid can be expressed as $W = \rho Vg$. (Yahoo Tech.)

(11 to end). Further enquiries from the 'DE' ref the Odyssey report continue in the same vein of concern.

All the queries of concern by the Drainage Engineers as indicated in their reports submitted on Nov16th and Nov.21st 2023 are included in my objection, and allegedly support the necessity for pre-conditions requirements contained, for any planning application if an approval is to go forward.

I obviously cannot comment on any updated references yet to be submitted by the 'DE', or the applicant with regard to flooding/further Odyssey report, unless there is time to do so within the consultation period.

4. Ecology Note and Preliminary Ecological Appraisal RPS Group

a) Ref. email between Simon Davis and Paul Carnell relating to 'offsite ponds', May 16th 2025 which stated, '*We need these prior to determination*'. Please be advised that there is a vernal pond as part of the natural drainage ditch system on my property from fields adjacent but has never been assessed. (objection).

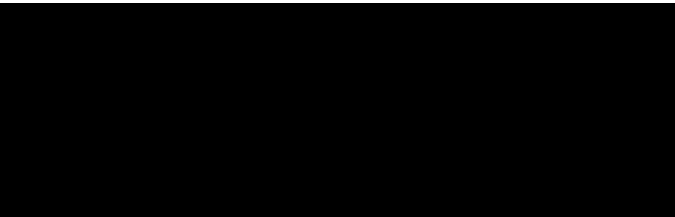
b) In the past there were water voles. Ducks and moorhens have already nested. The pond was full of water in April, and as also indicative of the water table, as well as the pond being within the 500m specified area.

c) Where is the designated local Bat Survey from ADC, not just a generalisation?

Yours sincerely,

Dilys Lownsborough

REP



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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<https://www1.arun.gov.uk/planning-application-finder>



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From: Simon Davis <Simon.Davis@arun.gov.uk>
Sent: 27 May 2025 09:54
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Objection to Y/32/25/PL Redrow application for Land West of Bilsham Rd.

Objection

From: [Redacted]
Sent: 25 May 2025 17:23
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Objection to Y/32/25/PL Redrow application for Land West of Bilsham Rd.

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Dear Mr. Davis,

Pease find enclosed as attachment, my objection ref Drains and Drainage ref Y/32/25/PL Redrow planning application.

Yours sincerely,

Dilys Lownsborough