

**From:** Nicola Oktay on behalf of Planning.Responses  
**Sent:** 30 May 2025 12:15  
**To:** Planning Scanning  
**Subject:** FW: Further Objection FRA and other ref. Y/32/25/PL Land West of Bilsham Rd. Yapton BN18 OLA (3) Lownsborough  
**Attachments:** Flooding Concerns Objection ref Y 32 25 PL Redrow Application 3 .doc

REP

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**From:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Sent:** 29 May 2025 15:52  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Subject:** FW: Further Objection FRA and other ref. Y/32/25/PL Land West of Bilsham Rd. Yapton BN18 OLA (3) Lownsborough

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**From:** [REDACTED]  
**Sent:** 29 May 2025 15:39  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Subject:** Further Objection FRA and other ref. Y/32/25/PL Land West of Bilsham Rd. Yapton BN18 OLA (3) Lownsborough

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Dear Simon Davis,  
Please find enclosed as attachment further objection (3), 4 in total regarding Redrow planning application Y/32/25/PL.

Yours sincerely,  
Dilys Lownsborough

The Potting Barn  
No 5 Hobbs Court  
Bilsham Rd.  
Yapton

West Sussex BN18 OJY

May 29<sup>th</sup> 2025

**Planning Reference: Y/32/25/PL Redrow Homes Ltd.  
Application for 170 dwellings for Land West of Bilsham Rd.  
Yapton West Sussex BN 18 0LA**

### **Further Objections to Y/32/25/PL (3)**

#### **1. FRA and Drainage Strategy Details and Reports by Odyssey for Redrow Homes Ltd. and Matters in Association**

a). The current FRA Assessments by Odyssey for Redrow, was uploaded onto the website on 24/4/2025. It included reference to an earlier report by 'Survey Solutions' in 2021, (no document was included for verification now).

b) It is questioned why Odyssey would include reference to details from 2021, when they had already presented another, more recent drainage/flooding report for the same site for Boklok, (Y/52/23/PL) which superseded it, and as already in the public domain, since 24 /10/2023.

c) I refer, as an example of an alleged discrepancy: -

On Nov.15/16<sup>th</sup>2023 the ADC Drainage Engineers queried part of the Odyssey report (Item 8). Their concerns were regarding the 'over topping' of the banks from the Rife, as *higher* than the attenuated basins.

d) The Odyssey response stated, '*The land falls to the West*', which would appear to *contradict* the Drainage Engineers statement.

e) The latest Odyssey report of April 2025 under 2.2, 'Topography' 2.2.1, referred to the earlier statement from 2021 differently :- ' A *topographical survey was undertaken by Survey Solutions in April 2021. The site survey shows that the land falls from the North East to the South West corner*'. It is questioned how the land as described by Odyssey can 'fall to the North East' and South West' in 2021 but 'falls to the West' in 2023.

f) The ADC Drainage Engineers comment that the Rife is higher than the attenuated basin would indicate that the land *rises* to the West instead.

g) Dedicated maps submitted for the area show flood indications *from* the Rife. Some aspects of the Rife in one, are allegedly 'hidden' under a red boundary line. Water flows in a downward direction from a higher source, not up. Also, allegedly in relation to any overflow from the attenuated basins.

h) Although all opinions should be recognised, it is understood that the ADC Drainage Engineers are the definitive source for reference in this scenario.

i) In the event of hydrostatic rise of the liner, any water excess in outcome, would also allegedly be likely to flow into Bilsham Rd. (to the East). My property in Hobbs Court is nearest to the lowest most South- Easterly portion of the site, containing the attenuated basin.

Also possibly affected in association, is the lowest point in that area of Bilsham Rd. Hobbs Corner, and the entrance to Hobbs Court, (and an additional 4 houses).

j) As flooding has never occurred onto my property in approx. 10 years of ownership, or known as occurring prior, any adverse

flooding outcomes because of actions undertaken regarding the development/attenuated basins, would allegedly reflect adversely on those making any decisions to precipitate it, and in terms of remediation.

## **2.Environment Agency Maps and ‘Modelling’ of the Area ref. Flooding.**

a) Such ‘National Data’ and ‘modelling’ maps, relate to ‘known’ areas of flooding in urbanised parts of Yapton, not in relation to annual flooding in farm fields, as not listed routinely.

b) Some maps submitted by the agent, show the urbanised area of the Thakeham site, directly above the proposed Redrow development site, (also containing the Rife and showing flood areas there in association).

c) Other maps submitted, show the same area as *open country* or in part, which is allegedly misrepresentational. The Thakeham site also has an attenuated basin, with the same or similar flooding considerations, that may also allegedly impact adversely on the proposed Redrow site below.

d) The Rife is not in isolation on the proposed Redrow site. It is part of many watercourses in the area, and ‘flows’ in a generally Southerly gradient in that location as flood maps confirm.

e) The Thakeham site is understood to have planning approval for run-off into the Rife, as also proposed for the Redrow site. 250 properties with run- off already as above, and the proposed site for another 170. Any external aspects allegedly also directly affecting a planning proposal site should be considered.

## **3. Window Sampling Log (Ibex)) Undertaken on Behalf of Odyssey for Redrow Homes Ltd.**

a) This involved a series of borehole tests on site, to establish soil types and water levels. It was undertaken between Oct 7<sup>th</sup>-Oct 11<sup>th</sup> 2024 as indicated on their data sheets.

b) **Alternative Expert Advice, advised that water levels should be tested in early Spring (Feb/March),** to obtain an accurate picture of the highest water levels during the winter period, when flooding would be most likely to occur.

c) It is questioned why borehole testing was commissioned for October in any year, when it would already allegedly be known that results would only relate to that specific timeline and would not be representational of accumulative water levels over the winter months.

d) In proof of a reason to take note of the time of highest water levels: The Dambuster raid to bomb the dams in the Ruhr valley in Germany on May 16<sup>th</sup> 1943, waited until the dam water was at its highest levels, to inflict maximum flood damage in outcome.

#### **4.The Odyssey Report FRA and Drainage Strategy,24/4/25**

a) **2.3.2** refers to a BCS access in review, which describes a '*highly productive aquifer.*' This is a historic underground natural water supply of drinking water, to a large area of West Sussex.

b) I was unable to locate any reference as to how the development depths of proposed digging on the Redrow site may affect this, nor how any development run-off water into the Rife may leach into that supply.

c) **2.3.3** Advised in text, of a geotechnical appraisal by 'Ibex' as being in NOVEMBER 2024. However, the Ibex water logging assessment is shown on their tables as being between 7/10/2024- 11/10/24, in OCTOBER 2024.

d) The details supplied in the Ibex own data sheets on record, should take precedence in acceptance of timelines. Also confirming, that the appraisal was undertaken a month *earlier* than as referenced in the Odyssey report, where water table depths would be notably even less than after the winter period.

e) **2.3.7** of the Odyssey report advised that groundwater levels were noted at depths of 2m and 4m, (by Ibex), in *Nov. 2024* again, in contradiction of the latter's actual data report documents of Oct. 2024.

f) Reportage of groundwater levels are anticipated to be a major factor in deliberations regarding the application. If the above details under 2.2.3 and 2.3.7 above, are assumed as conclusive for Odyssey rather than Ibex, it would allegedly be based on a false premise.

g) As the details submitted by Ibex are allegedly at variance with those of Odyssey, who allegedly commissioned their actions and report, any inconsistency in outcome is of obvious concern. It also allegedly questions the relevance of the details in that section, if they do not relate to *actual* winter water table levels affecting the site. ( ie., October 2024, through to Spring 2025).

h) The Redrow Homes application was added to the website on 1/5/2025, allegedly allowing plenty of time to test and submit up-to- date water levels prior in 2025. As there has been a notably dry spell from April to May this year, it would also not align to winter levels if tested again then, or now.

i) **2.3.5** Odyssey details indicated in text their alleged interpretation from the Environment Agency maps, that the nearest 'Main river' is a tributary of the 'River Ryebank Rife'. (The latter is not listed as an existing river).

The 'Main River' is the river Arun (Littlehampton) into which Rifes in the area feed. There is a distinction between outcomes from run-off water from fields into watercourse (ditches) as opposed to the 'flow' of tidal influences.

j) **2.3.8** Groundwater levels were reported as undertaken by Leap Environmental, between Oct. 2022 and April 2023 advised as being under Appendix D in the Odyssey report. I was unable to locate spread sheets from the earlier time in that section, only indicative written response references to 'low ' or 'higher' water levels in general regarding the site. Also, additional test data sheets by Ibex, from October 2024.

## **5. Existing Drainage Regime 2.4 Onwards**

a) **2.4.1 and 2.4.2** Indicated that Southern Water advised that there are no public sewers on the proposed site and that it is located to the North of Bilsham Rd.

b) The aspect of water, sewerage, and attendant matters will be addressed in a separate response.

## **6.Planning Policy and Planning Policy Framework 4.1 Onwards**

a) **4.2.1** Indicated the NPPF recommendations favour sustainable SUDS systems. Unfortunately, the introduction of infiltration units to dwellings, has already been advised against by the Drainage Engineers because of the high water table levels.

b) The narrow Rife ditch, (full of vegetation) and attenuated basins are apparently intended to obviate this, rather than as an extension to anticipated infiltration units as alleged previously anticipated for the site. The effect of this reduction to manage runoff water allegedly needs to be assessed more closely, because the Rife is not a River.

c) The Rife 'flows' downhill to Bilsham Lane by gradient, which is already a recognised flood area. Impassable at times in the winter except by SUVs.

**d) 4.2.2 Para 170 of the NPPF states: 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk ( either existing or future). Where development is necessary in such areas, the flood risk should be made safe for its lifetime without increasing risk elsewhere'**

e) There is an existing flood risk, and for the future, as indicated from submitted reports and maps from the applicant as above. They also allegedly indicate in outcome, that development should be avoided in the location under such circumstances.

The NPPF is quoted as guidance, but LAs are advised to adhere where appropriate. It appears that such advice should be followed in this instance. It is unclear from details presented by the applicant, how the above aspect of the NPPF caution is intended to be resolved otherwise.

f) What 'safety precautions' are advised regarding overflow from the Rife, and how is any increased risk of flooding to the area to be addressed?

g) If culverting was introduced, any flow rate towards Bilsham Lane would allegedly be increased (no vegetation then to impede it). If not, and the Rife remains open it has already been advised of potential flooding due to the higher level of the Rife to the site by the ADC Drainage Engineers.

**7. The WSCC Lead Local Flood Water Drainage Response  
21/5/2025**

a) It is observed that the LFFA advise in response to the Consultation that they would have no objection to the application if conditions were agreed. If not, they would object.

b) In main para. 1, they advise that they have reviewed submitted documents and have concluded that they meet the NPPF and other requirements.

c) In view of any alleged discrepancies presented in Odyssey report and in relation to the earlier Drainage Engineers concerns for Y/53/23/PL, and as indicated above in my response, (1, a-e), and ref.6(d) above ref, the NPPF para 170, it is allegedly impossible to know to which specific part in agreement they are referring.

c) The LFFA include conditions 1,2, and 3, which are both pre-commencement conditions and pre- occupation conditions required to be agreed by the LA, before any approval to the application would be given.

## **8.Conclusion**

As it appears that there are allegedly unanswered, contradictory or inconclusive details submitted on behalf of the applicant, in aspects of drainage and flooding, it is felt necessary to register an *objection* to the Redrow Homes submission for planning approval.

Yours sincerely,

Dilys Lownsborough