

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

Aug. 4th 2025

**Alterations/Revisions Substituted plans by Redrow for the
Planning Application for Y/32/25/PL for 170 Houses for Land
West of Bilsham Rd.**

Objection

Dear Sir,

1.Introduction

a) In seeking to check on some earlier details submitted by the agent for the Redrow application Y/32/25/PL (validated on 1/5/2025, for a Consultation of 21 days), I discovered that over 50 substitute plans, revisions and other documents had been added to the website by Redrow/agent on 28/7/2025. They also allegedly included aspects of change, as *material considerations*. These additions were uploaded onto the website only 3 days before the stated 'Decision Day Notice', advised for 31/7/2025,

b) Permitting an applicant to submit such extensive details so long after a Consultation cut- off date also raises concerns about alleged predisposition and bias in favour of the applicant, to the detriment of others.

bi) The submitting of additional details was also allegedly at variance with the details on the (ADC) Local Validation Requirement List for applicants. Para. 4 and onwards which states: - ***'Do not make your application until you have finalised***

***all the details of your project and all the details needed. -
Once validated it is unlikely that the case officer will enter into
negotiations.'***

c) The necessity of a Pre- App is to discuss the main aspects of any proposed development with planning officers, *before* an application is submitted, so that any potential difficulties can be ironed out first. In this instance, extensive changes, 'Rev' documents, 'Substitute Details/Plans, and Additional Documents' were submitted approx. 2 months *after* the end of the Consultation, which was at the beginning of June 2025.

d) As so many aspects allegedly needed alteration, it is fair to ask why they were not submitted 'correctly' in the earlier submission. No indication of an s106 obligation agreement for affordable housing has been included earlier or now, in support of 30% affordable housing otherwise advised with the application.

e) That a 'Consultation' period, has now been extended to Aug. 17th 2025, may be necessary in view of 'changes', but not considered fair and transparent to the public/ Consultees and Cllrs. who may not necessarily be aware of ANY changes to the application on the website at this time, unless specifically advised. An outcome recognised as an allegedly effective way to stifle further comment and debate.

f) July and August are traditional holiday times, when application websites would be less likely to be viewed again. Especially since the application was initially anticipated to go to Committee in August, only now indicated as September.

2. Further Comment in Objection

- a) It is understood that some minor adjustments may be needed to any application, before going before the Planning Committee, but the new changes are allegedly of such magnitude as to represent those of an entirely new application instead, but under an alternative guise.
- b) Such extensive alterations are also considered a 're-writing' of the original, and 'moving the goalposts' to the advantage of the applicant and to disadvantage and possible confusion to others in review. Developers should not be given the opportunity for extended timelines to include major changes to *material considerations or the addition of significant details* not included in their original applications.
- c) Such late action also allegedly casts doubt on the applicant's understanding of the site, design, layout and affordable housing sizes and requirements ref. the Arun Affordable Housing Policy.
- d) It is understood that a Consultation for planning applications is so that the public and Consultees can submit objections or approvals to the application as *originally* submitted in good faith, within the timeframe specified. Not to consider late submissions.
- e) There were approx. 80 resident Rep objections in response to the original application for Y/32/25/PL. Consultees also contributed, in response. The changes made by the applicant now, can indicate that those objecting earlier, gave incorrect information, because they were only able to comment on details supplied by the applicant from the earlier time.
- f) Records confirm that Redrow have had considerable time to prepare their application proposal over the past 6 months. They

were also reviewing the same site additionally during the Boklok application for Y/52/23/PL in 2024. The former announced that they were taking over the site from Boklok on Jan. 24th 2025.

g) Although it may be assumed by some that this application will be approved, but if it is under present circumstances, it may trigger a subsequent Judicial Review in objection.

This would not only examine the original application proposal, but also the actions of all those involved, and how they also relate to the public/Consultees and the Consultation/s as a whole.

gi) A recent High Court case 'Greenfields IOW Ltd. versus IOW Council' (Singh and Lewis LJJ) was 'won' on Appeal on April 25th 2025, which ruled that the approach to the public was unlawful because some of the details had not been made available to them correctly, and the planning approval should be quashed in consequence.

gii) In response to the Court's invitation on relief, the Council argued that the judgement should remain as unlawful regarding details to the public, but the proposal application should remain. The judge ruled on April 29th 2025 that the judgement would remain in total, and the planning proposal should be quashed. Greenfields IOW Ltd.' won' again and were awarded 75% of their costs.

h) If the application for Y/32/25/PL is refused and an Appeal is lodged by the applicant, the Gov. Inspector investigates the whole process, to see if it was correctly undertaken, and the rules and requirements acceded to in association.

i) Local Government Association Guidance and PAS states: -
'Probity in Planning'. *'Probity in Planning is about ensuring that decisions on plan making and planning applications are*

undertaken on behalf of communities in a fair impartial and transparent way’.

3. The Substantial and Multiplicity of Aspect Changes Submitted by the Applicant on 28/7/2025, Including Material Considerations are in part examples as follows:-

a) House Style and Plans, Travel Plans, Flood Risk Assessment and Drainage Strategy, Transport Assessments, and BNG Metric. Planning Layout, Materials Plan, Storey Heights Plan, Enclosures Plan, Affordable Housing Plan, Parking Plan, Waste Collection Plan, Compliance Plan, Accessibility Plan, Yapton Street Scenes, General Arrangement Plan (170 unit Replan), Details Soft Landscape Strategy 1 and 2, Landscape and Services Plan Sheet 1 and 2. Indicative Street Lighting Rev. A, BNG Metric (PDF and EXCEL) 17 05 25, House Types Drawing 4th July 2025, Travel Plan 24-217-010 Rev B (June) 2025 parts 1 and 2, Flood Risk and Drainage Strategy 217-24 Rev B June 2024, Parts 1,2, and 3, Transport Assessment 24- 217 Rev 09B June 2025 parts 1-7, BNG Metric 794-ENV-ECO-21633 Rev C. July 2025.

b) A letter from the planning officer to the agent, (*after* the first Consultation had closed), was added on 18/6/2025. It included a composite list of observations; site layout, spaces between houses, rear garden size, changes to BNG, and outlining proposed changes regarding bedroom numbers. Also quoting extracts (items 15 and 16) from the Inspector Appeal Review details for Y/52/23/PL for the same site as Y/32/25/PL.

c) The applicant responded with reference to other details from the Inspector Review, on 4/7/2025 which appeared at variance with 15 and 16, but did not appear to consider all the Arun Affordable Housing Policy in association. Also, referring to

matters in the Inspector report, which related to a different style of housing design and bed numbers, footprint, mix and layout, for Y/52/23/PL, which allegedly cannot be used as a direct comparison with an entirely new application for Y/32/25/PL.

d) The agent response now, did not apparently consider, that although planning approval was given on Appeal for 170 Boklok houses, the application was proved to be non-viable, (as also advised to the Inspector at the Appeal review in Dec 2024), because the suppliers of modules for Boklok had ceased trading approx. 2 weeks beforehand in Nov. 2024, as there was no alternative supplier advised.

e) Allegedly, to seek clarity on the discrepancy with reference to bed numbers for houses and other aspects relating to affordable housing, the Planning Officer contacted the ADC Economic Development Officer on 3/7/2025, whose response was uploaded on 7/7/ 2025.

f) His response referred to Arun Housing Policies, which were not allegedly in accordance as supplied by the applicant, in their proposal or updated response. The Housing Development Officer stated in conclusion in response: *'We are unable to support a recommendation for approval of this application'*.

g) As this response was *after* the details were submitted for requested comment by the planning officer as indicated above, with no further update, it is understood the position of the Development Officer has not changed.

h) Although that response gives some clarity, it is allegedly a discussion which should either have been undertaken during a pre- app or during the Consultation, not approx. 2 months after it ceased.

4.Alterations to House Types, Plans and Elevations and 'Material Considerations' also added on 28/7/2025

a) New house types allegedly submitted, elevation drawings and apparent changes to some existing houses in plans and layout from those originally proposed, gave a change in appearance to the site for Y/32/25/PL in general. Changes included, as 'Substitute Document, Substitute Plan, and Additional Documents,' including 'Revisions', 'alterations' and 'additions'. As above and also as relating to houses specifically as follows:-

ai) House Types Drawing, July 4th 2025, Amberley -plan and elevation. The same for, Cambridge, Harrogate, Marlow, Warwick *Stour and *Trent .

b) Approx. 1/3 of alleged change to house types to those submitted in the original application, and * apparently changes within those house styles/footprint/internal layout.

c) The applicant has allegedly changed their details at will, allegedly ignoring specified timelines for a presentation, to their advantage, and to the alleged disadvantage of others. At the same time apparently being given the opportunity to correct any alleged failings in their original application with impunity.

d) Whereas it is understood that 'material considerations' are perhaps in some cases a 'movable feast', there must come a time when there are so many changes that a new application is the only answer in fairness to all?

Yours sincerely,

Dilys Lownsborough

[Redacted]

[Redacted]

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[Redacted]

Sent: 04 August 2025 13:04
To: Planning <Planning@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Nicola Oktay <Nicola.Oktay@arun.gov.uk>
Subject: Objection details to recent submissions by Redrow Homes Ltd. Y/32/25/PL for Land West of Bilsham Rd. Yapton

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Dear Recipients,

Please find enclosed as attachment, my objection to the additional submissions to the planning proposal for Y/32/25/PL for Land West of Bilsham Rd. Yapton West Sussex.

Yours sincerely,
Dilys Lownsborough