

**The Potting Barn  
No5 Hobbs Court  
Bilsham Rd.  
Yapton , West Sussex  
BN18 OJY**

**Planning reference. Y/32/25/PL, Redrow Homes Ltd.  
Application for 170 dwellings for Land West of Bilsham  
Rd.BN18 0LA**

**May19th 2025**

**Further Objection to the Redrow Homes Ltd. application (1).**

Dear Sir,

### **1.Introduction**

a) Objections to major development in Yapton have been made many times over recent years, in contrast to the developer's stated alleged virtues of their proposed sites in the area. Those on the receiving end of development outcomes, have seen and experienced first- hand, the alleged adverse and disadvantaging impacts on their lives and neighbourhood in result.

b) Objections to local development are not raised for the sake of it, the problems are real, but apparently those making decisions regarding them do not allegedly always take them on board. They 'hear the words,' but are not apparently 'listening' to concerns.

c) To reiterate: -

In Yapton, the sole GP surgery is not taking any more patients, there is no dentist, schools are over- subscribed, no facilities for young people, no caffes or restaurants, minimal shops, roads

gridlocked, biodiversity ignored, and agricultural fields extinguished. Flooding and sewerage problems are ignored too.

d) NPPF guidelines appear to be followed slavishly in decision-making, although not legal statutes. They are open for opportunities to reject applications, but there is allegedly a fear that developers will appeal and the LA would have to expend valuable resources to defend a case.

e) Build quotas are intended to be spread between all of Arun not concentrated in Yapton. Signing off on developments without infrastructure in support, is a recipe for disaster, which is also confirmed daily with increased crime and social disturbance.

f) Vigilant resident objections have borne fruit over time. For example, investigations into the side issues of Top Hat for Boklok,(on the same site as now), discovered that the former were a failing company, which terminated in Nov.2024.

g) Although the application was passed by the Gov. Inspector on Appeal, it was a pyrrhic victory for Boklok, because the development was non- viable in outcome. But inherent and unresolved difficulties remain, concerning the same proposed site.

## **2. Recent History**

a) Redrow Homes Ltd. took over the Boklok site on Jan.24th 2025.

**b) An Article 13 Notice is registered as a requirement on the website.** It advised that owners /tenants of a property, must be informed of any proposed development.

c) I object that the details to identify the owners of the site have allegedly been redacted from the appropriate form. The owner of

a property is not privileged information, because the information is eventually available from Land Registry Title documents.

d) All objector's names and addresses are published regarding the planning application Consultation. ADC proclaim 'transparency', but withholding land ownership details does not chime with that advice in this instance.

### **3. CIL and S106 Payments**

#### **CIL**

a) A CIL contribution is required as part of any major planning application approval, as a developer financial contribution towards the Arun area in general. (Not for Yapton specifically).

b) The amount is allegedly calculated on the proposed square meterage of the total footprint of proposed dwellings.

c) Website details advised that Simon Davis asked the agent for this detail, to calculate the CIL amount, on May14th 2025. I object that no financial CIL details have allegedly been provided/published in response from the agent in result. Residents should know of developer contributions, for the privilege of building in our village?

d) It is noted that the *planning application costs*, (submitted on May 2nd 2025), worked out on *site size*, were quoted as £54,065. So why not the CIL payment on the website? Which is worked out on the collective meterage *footprint scale* of dwellings in addition, which is requested now, to be supplied during the Consultation.

#### **3.1. s106. None Is Known To Have Been Confirmed For The Present Application.**

a) The previous s106 was signed as a 'Deed of Variation' on 19/12/24 between Boklok Housing Ltd. and WSCC. *After* the Gov.

Inspector Appeal Review, on Dec.10th 2024.

The original s106 agreement has apparently been removed from the Y/52/23/PL website, (also between Boklok and WSCC), so it is impossible to see to what the Deed of Variation refers. I object on that basis, and request that it is reinstated.

b) It is understood that an existing s106 continues with any new owner/developer, but the current owner of the site has been redacted from details as stated.

c) The earlier s106 version contained aspects relating to school-children travel payments. That matter was not resolved at the Inspector Appeal meeting, which is why it is considered imperative that the earlier s106 signed agreement is made available now for comparison, continuity, and comment.

d) Part of earlier alleged dissent between WSCC and Boklok regarding the travel payments, was whether calculations should be based on a 30 dwelling 'uplift' from an earlier application, or for 170 dwellings in total.

e) 'Economic Regeneration' were contacted for comment by Simon Davis, on May 2nd 2025, with reference to anticipated s106 'Affordable Housing' requirements, when responding to his request. No substantive response is on the website at time of writing either.

f) It is understood that a signed s106 is required before a planning approval can be given. 'Supporting documents' are also understood to be made available to the public.

g) I object that there has been no indication of any current s106, regarding the Redrow Homes Ltd. planning application, in relation

to 'Affordable Housing' and travel payments for schoolchildren in association.

#### **4. Housing Development in the Area**

a) I object to more housing in the area because there is no 'need' for it. Because of this, there is also no requirement to build outside the BUAB which is defined in the YNP2.

b) The NPPF indicates reasons in favour of build as -

*'A sustainable pattern of development that meets the development needs of the area, aligns growth with infrastructure, improves the environment and addresses climate change'*

c) I object that this much quoted mantra, as a reason for development approval by developers, as it is allegedly at variance with outcomes for Yapton.

d) The proposed development does not show that it meets a 'need' for further homes, when existing and part build developments remain unsold for months/years. Approx. 200 houses currently on estate agent's sites for Yapton, mostly new build.

d) 'Growth' as caused by increased development, is not aligned with infrastructure in Yapton, it has declined.

e) A housing estate in an existing rural area does not 'improve the environment', it destroys it, by eliminating existing biodiversity. The removal of swathes of the natural environment affects climate change adversely too.

f) The NPPF also states that it is a requirement that any new development, *'Emphasises the importance of making effective*

*use of land in meeting development needs, while safeguarding the environment and living conditions’.*

g) Trees /bushes, have a vital role in cleaning the air from carbon dioxide. They also help to control water in mitigation, (against flooding and soil erosion). The proposed development allegedly aims to destroy/remove most of the existing trees and bushes surrounding the site. The ‘artificially created’ environment replacement is no substitute as a ‘gain’ for natural verdure established already.

h) There is no certainty that the alleged biodiversity ‘gain’ advised, would ever become a reality. Planning approvals only state inclusions approved *if* undertaken, not that they must. There are no certain safeguards for the environment in the application. Possibilities of intention are not safeguards.

i) Grade 1 and 2 agricultural land lost for food and any other agricultural activity is not an advantage, it is another detriment. The CPRE report 2022 advised that:- *‘In the last 12 years we have lost over 14,000 hectares of prime agricultural land to development, including 287,864 houses-equivalent, to the productive loss of 250,000 tonnes of vegetables, and enough to provide nearly 2 million people with their 5 a day for an entire year’.* It is apparent that this concerning trend for lost land has continued apace since 2022 especially in Yapton, on record.

j) The increase in local flooding and sewerage problems are allegedly ‘exacerbated’ by increased development in the area, in part, because of water displacement and ‘overload’ to older existing pipework, also contributing adversely and detrimentally to the local environment and every-day living.

k) I also object as in items referred in b-k, that the real and present issues, are being ignored in planning decision-making in favour of further development to meet other criteria. Problems through development are allegedly set to continue, rather than necessary solutions sought and resolved.

## **5. Housing Quotas- 'Affordable Housing'**

a) Housing Quotas will never be fulfilled while planning applications are approved, but developers do not 'build out' continuously. Until a property is sold, it is not on any housing supply list. Thus, always showing a deficit as a reason for developers to make more and more requests for planning development approvals.

I object because planning approval housing numbers in major development, substantially exceed build out, but this is not considered in quota assessment, giving an allegedly false impression of 'need' inappropriately.

b) I also object to a developer requesting planning permission for an additional site, until they have completed selling those on their existing ones in the area. They cannot evidence a further need if there is a surplus. (NB. Daily Mail 29th March 2025, '*Barratt Redrow have about 100,000 plots*').

c) The 30% 'Affordable Homes' advised in the application are as compliance levels required and appear favourable in planning terms.

d) Unfortunately, even with an s106 legal agreement, there is no certainty of execution, as developers and planners are already aware.

e) A DoV. (Deed of Variation) can be applied for by developers, to vary the s106 obligation regarding 'Affordable Housing'.

i) I.E., If the developer can show that the development has not made 20% profit, they can return to the LA to reduce 'affordable' housing, even to extinction. At present, this is a legal loophole. There are other considerations for a DoV to reduce numbers for 'Affordable Housing'.

ii) Housing Associations/ Registered Providers (RPs) can bid for 'affordable housing' on sites.

iii) Currently, this process has slowed, as RPs are choosing to go down other routes. This can mean that the definition of a house type can be 'reassessed' (Dov) for 'first time buyers' or other more marketable categories. 'Affordable Housing' is a very broad brush stroke covering many aspects, which is allegedly meaningless unless specified particularly in a planning application.

iv) In short, there is allegedly no certainty, that any percentage of 'affordable' properties will materialise in a development as originally advised in the planning application.

## **6. ADC report, 'Affordable Housing Delivery' March 2025, (Prepared by 'Three Dragons').**

a) The report, (47pages), highlights the difficulties in delivery outlined above and in relation to other concerning factors.

b) Details in the report advised in the section -

**'ADC Homeless and Rough Sleeping Strategy':** - *' For 2020/21 and to the end of 2023/24, the Council had accepted 3,093 homeless applications. In relation, the housing waiting list stood at 2,274 averaging 1,774 per annum. Delivery has not been keeping pace with demand for affordable housing. From 2021-24*

*the average annual build for such housing to completion was 181 per annum and is falling well below the Local Plan requirement to provide a minimum of 30% affordable homes....It appears that Developers are choosing to ask ADC to accept an alternative type of housing that does not involve RP in its delivery’.*

b) Such details sadly exposes that the difficulty is not a housing shortage crisis, but that the right sort of affordable housing ‘need’ is allegedly being compromised instead.

c) I believe that anyone with a degree of compassion will be appalled by the figures above and desire some resolution. But it is also apparent that it is unlikely, where development planning applications continue to be approved unabated; and when the root causes are not addressed by way of satisfactory outcome, to ensure the right sort of ‘affordable housing’ is available to those who need it most.

d)The Three Dragons Report content also states: *‘In the past year, ADC received four DoV applications which directly impact on how affordable homes are delivered, with informal approaches made by developers for another 4 schemes, indicating the developers’ wish to vary the terms of the current S106’.*

It also highlighted, that developers can apply for a DoV up to 5 years after the completion of the obligation.

e) Also indicating that Registered Providers, (RPs) have shown an increased reluctance to make bids on affordable housing as in s106 agreements, and were reducing this approach to little, and working towards none. Preferring to move towards ‘land led’ housing development, to contain 100% ‘affordable housing’, attracting public subsidy with grants from Homes England instead.

f) Many suggested alternatives were explored to address this difficulty in the report too. Including to change designations to 'First Homes' to allegedly 'get round' some of the other category difficulties in an s106 by 'avoidance', and because RPs have moved away from supporting such categories in relation to s106s.

g) Also in the report, *'The reluctance of RPs to take up affordable housing units delivered through s106 agreements is emerging as a national issue, with local authorities facing similar issues to those in Arun.'* *'They have also ceased because developers are asking more than RPs are prepared to pay'*.

Switching 'affordable homes' to 'first homes,' may assist with selling prospects, or switching from some or all shared ownerships, to avoid an RP, but not allegedly for those requiring the specific type of homes.

h) In the light of the present situation and as highlighted in the Three Dragons Report for ADC, to suggest 30% 'Affordable Homes' will come to fruition, if the Redrow planning application is approved is guesswork. No one can possibly know what form an s106 form is to take, whether RPs will be involved, or whether a DoV will be applied after any approval later; to allegedly deny those most in need, in favour of more marketable categories of property for sale instead.

l) As the whole issue is allegedly in a state of flux I object to any planning decision being reached on this application, until a secured plan of action is decided regarding assistance for the most pressing demand for housing types, not market forces.

m) The ADC Planning Department are predisposed to pass all planning applications. ADC Cllrs. on the ADC Planning Committee are not. The main thrust of Three Dragon Report is a

Nationwide problem, yet to be resolved locally and nationally, but are Cllrs. going to continue approving developments that deprive those most in need without necessary resolution to this Gordian Knot??

May I respectfully request that this application is refused until a definitive regarding the certainty of delivery of all aspects of 'Affordable Housing' are addressed and resolved? Thank you.

Yours sincerely,






Dilys lownsborough

Arun District Council, Civic Centre, Maltravers Rd  
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**Our priorities...**

 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 
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**From:** Simon Davis <Simon.Davis@arun.gov.uk>

**Sent:** 19 May 2025 17:33

**To:** Planning.Responses <Planning.Responses@arun.gov.uk>

**Subject:** FW: Further objection to Redrow application Y/32/25/PL Land West of Bilsham Rd. BN18 OLA (1)

Kind Regards

Simon

**Simon Davis MRTPI**  
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[Redacted]

**Sent:** 19 May 2025 16:21

**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>

**Subject:** Further objection to Redrow application Y/32/25/PL Land West of Bilsham Rd. BN18 OLA (1)

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Dear Mr. Davis,

Please find enclosed as attachment, additional objection to Redrow Homes planning application Y/32/25/PL (1)

Yours sincerely,  
Dilys Lownsborough