

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

Oct. 8th 2025

Planning reference: Y/32/25/PL, Redrow application for 170 houses for Land West of Bilsham Rd.

Objection

Objections to the latest 'Additions', 'Substituted Plans' and 'Revisions' and in Association, on the following grounds: -

1.Ref The Original and Subsequent Submissions and Extended Timelines Given.

a) The original Redrow application was validated on May 1st 2025. The Consultation was to cease at the beginning of June 2025.

b) Since then, 2 further extensions of time as 'Consultations' have been given to the applicant. The last 2 would be mainly unknown to the public for comment, because it is a general assumption, that the end date for a consultation is the prelude to the ADC Planning Committee Meeting to review the application submitted.

c) An objection was already made regarding extensions of time for the applicant, but timelines have been extended further. Approx. an additional 4 months has allegedly been given in total to the applicant, to 'ready' the submission to be presented to the ADC Planning Committee. Originally mooted prior, to be for August, September and October, now 'targeted' for November 19th 2025.

d) Also currently, approx. 8 months for Redrow to prepare since it was announced that they were taking over the proposed development of the site on Jan. 24th 2025, and 9 before the newly

proposed 'Committee date'.

It is in objection that such apparent 'leeway' has been given to the applicant rather than insistence on an entirely new application to be presented.

e) A pre -app was not applied for, where the 'additions' submitted now could have been discussed earlier. Arun Planning Policies, Design Guide, and a multitude of other reference points and requirements details, are all available on websites to consult, regarding any planning application, as well as any independent and legal requirements elsewhere.

e i) There was also the option to withdraw the application, as it would be within the 12months timeline for a 'free go' to resubmit.

f) It is understood that it may be necessary to submit *some* Revisions, Substitute Plans, and Additional Documents, but the noticeably excessive volume of changes, questions the necessity to do so at all.

fi) Over 90 'changes' of one sort or another from the original application proposal were submitted on either 28/7/2025, 9/9/2025 or 10/9/2025. The original housing plans were submitted from 23/4/2025- 25/4/2025. Changes were added on 28/7/2025, and further changes on 9/9/2025.

g) 170 dwellings were approved by the Gov. Inspector on appeal, on Jan. 9th 2025, but Boklok were unable to fulfil it because the pre-fab modules were no longer available.

h) The approval was only for the application submitted for Y/52/23/PL *not* for an alternative..... hence, the need for an entirely new application for Y/32/25/PL.

i) It is not an automatic assumption of approval for the application, as allegedly indicated in the Yapton News, May Edition No.131, as the application has yet to go to Committee.

j) The original Layout Plan1100, was submitted on 23/4/2025. In it, some properties were shown *side on* to Bilsham Rd. This aspect is not allegedly compliant with the Arun Policy/Design Guide. All properties fronting the development in Bilsham Rd. must be front on.

k) The properties allegedly non-compliant according to the original Layout Plan1100, (although the plan is difficult to assess when enlarged for review as blurring), appeared to be plots 5,129,139,151, 162 and 170. I draw attention to the Planning Officer comment on **8/8/2025** with apparent reference to the original Layout Plan1100, indicating an alleged need for correction, which stated:

ki) *'This does not go far enough to overcome our concerns with the *Southern part of the Bilsham Rd. Street Scene where 5 of the 7 homes are side on. The Boklok scheme had all plots side on to the road, so Active Frontage can clearly be achieved on this site'.
The frontage is to the East of the plan.

kii) And continues: *' I note that there remain several rear gardens that are not in accordance with the Design Guide and there remain uncompliant interface distances between homes'. (They are then listed).*

kiii) And continues: - *'We have a Design Guide, and we expect and require developers to adhere to the principles within that. We consider you need to comply with the requirements of the Design Guide in order for us to make a recommendation of approval*

because the current proposals cannot be supported and will be refused’.

kiv) And continues: - **‘As you have already had one opportunity to sort out this issue, we can give you until the 26th of August to submit amendments, otherwise we will refuse at the end of the month’.**

kv) It is of concern that the Rev B 1100, was submitted on 9/9/2025, approx. 14 days after advised the cut-off date for alterations to be achieved as above. (Aug. 26th 2025).

l) **Rev B 1100 Layout Plan submitted on 9/9/2025**, is also difficult to assess when enlarged, as blurs too. It appears that only property 162 has allegedly been changed through concerns expressed additionally and earlier by the Planning Officer on record. Plot 129 is not only apparently side on, but with what appears to be a side on garage and an unidentifiable ‘square’ construction in front. Very conspicuous in a street scene.

li) It is noted from planning correspondence on **1/3/2025**, that the Planning Officer acknowledges that allegedly 9 garden sizes and 3 interfaces have **not** been resolved. No mention is allegedly made in that correspondence, regarding the side on element to Bilsham Rd. being corrected in Rev B as earlier advised as requirement.

lii) There are still properties allegedly side on to Bilsham Rd. as remaining in the substituted plan but not approved. It is in objection that the Planning Officer has allegedly changed his stance from refusal to approval, for garden lengths and interfaces, although currently unresolved, (subject to the Drainage Engineers response).

liii) It is in objection that in 4 months of extra time, the applicant has allegedly failed in part to achieve all the recommended changes as advised above. If a Policy/Design Guide is not to be upheld, it would allegedly appear to render it meaningless.

m) As there have also been so many changes to house types since, it is allegedly considered impossible from submitted plans on the website to ascertain whether they are all compliant now in every way too.

n) At the time the Planning Officer details were sent the agent on 1/3/ 2025, stating that requirements had not yet been achieved, the Highways Consultation response had not yet been uploaded for 3/1/2025. It advised no objection, allegedly stating that the earlier aspects of concerns; gardens lengths, interspaces and side on properties to Bilsham Rd. had all been resolved.

o) It is in objection that the Highways approval appears to be at variance with the Planning Officer details of 1/3/2025, when not resolved, as advised in red to the agent, 2 days prior to the Highways response. Also, allegedly at variance with the proposed status of the development by so doing.

p) '**Material Changes**'. An objection to material changes from the Boklok application were also raised on 27/8/2025. There have been further changes since then on 9/9/2025. All the properties are entirely changed from those submitted by Boklok: -

pi) House style/ replacements/additions, materials, roof heights, footprints, floorplans, front and rear elevations, garden sizes, affordable housing mix, layout and designs. 'Material changes' are allegedly many but apparently ignored for consideration.

3. CIL Payments Form Details Submitted on 23/4/25 and 21/5/2025.

- a) They refer to payments which allegedly rely on square footage of 'footprint' of the *original* plans submitted.
- b) It is objected that the figures do not appear to reflect the changes in house types which are allegedly unlikely to be an identical footprint to the originals.
- c) The reference to play areas was submitted on 9/9/2025 approx. 4 months after the original details were submitted for the CIL calculations. An updated response to all later property submissions would appear to require investigation now, before being put to Committee, as allegedly appearing 'unsafe' without.

4.The s106 for Y/52/23/PL and Y/32/25/PL

- a) The Gov. Inspector approval for the Boklok application for 170 houses was contingent with an S106 signed agreement. This was understood to include 51 affordable homes as 30% of the total of 170.
- b) No general agreement was found between parties regarding part of the s106 content during the Gov. Inspector meeting and parties were given 7 days to resolve outstanding matters.
- c) A Dov was signed thereafter regarding said document, on Dec.14th 2024.It alluded to changes from the (Boklok) document. It is of note, that the Dov was not presented to the meeting in draft, nor added to the website for public review and comment before signing.
- d) The Gov. Inspector approved the application on Jan 9th 2025 without public reference to this aspect. The lack of advising of content in an s106 to the public (before signing) as previously

advised, has allegedly been cause for an application to be refused (thrown out) from an appeal in the High Court.

e) As there are allegedly no 'Bids' indicated from Housing Organisations or RPs advised, it can mean that allegedly *none* of the affordable houses (51) will be undertaken, in the way advised in the proposal. In the absence of 'bids,' any developer can return to the LA for a further Dov to re-allocate the affordable housing to 'market housing' through the 'Cascade Mechanism'. This method has allegedly already been deployed in Yapton, to allegedly allow for 90 'affordable houses,' to be returned to 'market housing' instead.

f) I object if details are being stated as included in an s106 to indicate that local people would be able to be offered affordable housing , when allegedly there is a good chance none will be built because of a 'mechanism' to allegedly prevent it.

g) The Gov. Inspector approved the Boklok application on the understanding that 170 houses, with 51 affordable houses to go forward. He did not agree to a Cascade Mechanism being introduced by a Dov to allegedly change it in that way later.

h) The developer should show that they have tried for bids and proof that this aspect has failed, (if so), and make clear to all including the ADC Planning Committee, before the Committee Meeting in relation to the s106.

4A) Arun Housing and Development Officer Response from the Consultation, 7/7/2025.

a) No update has been included on the website since, to indicate that the **Housing Development Officer** has withdrawn his

comment to *refuse* approval for the application in association with the details of concern above.

(This would appear to be at variance with the comment from the Case Officer to refuse the application on 8/8/2025. Items as above in connection under 1, j-m.(but now accept it).

b) As there have been so many changes and additions submitted by the applicant, it is impossible to know whether those concerns ref. affordable housing have been addressed and resolved to satisfaction, either all or in part, as not published.

c) Ref the s106 the Housing and Development Officer stated: ‘ *All the necessary affordable housing requirements would need to be included in s106 planning obligation, not secured by planning condition.*’

The requirements were then listed as indicated from various sources in confirmation.

d) That officer response also referred to the Arun ‘Affordable Housing Agreement,’ which allegedly also highlighted local policies for adherence. Underscoring that the details submitted to that point by the applicant, had not been met.

e) There does not appear to be any definitive direction that the appropriate mix and outcomes from affordable housing had allegedly been entirely resolved either.

f) The Housing and Development Officer response also allegedly anticipated that the affordable housing should take place in outcome, and be part of any approval as a reality, and according to recognised documents and polices, (not to become ‘market housing’ later).

5. Drains and Drainage

a) Although an objection was raised as a resident on 2/9/2025, there have been new 'additions' and 'revisions' submitted by the applicant on which to comment since, regarding that aspect.

b) The ADC Drainage Engineers have already said that infiltration units on the development site were unsuitable because of the high water table.

bi) See their response of 20/8/2025 uploaded to website on 26/8/2025. In which they state, '*That infiltration is ruled out due to high water table*'. They also advise that, '*Adequate winter filtration testing must be supplied to justify the proposed discharge method and design infiltration rates*'. A further explanation expands on this in detail thereafter.

c) Interception and permeable paving Designer Comments on Drainage Consult Response 9/9/2025 as of 20/8/2025 to comments by Drainage Engineers.

i) The applicant has now allegedly conceded that infiltration is not acceptable because of the high water table. Proposed 'alternatives' submitted, with numerous plans for the structures of permeable paving/roads and dispersal routes that were added in plans. Allegedly to seek to 'resolve' drainage issues on site.

ii) It is a requirement that any infiltration structure or similar must be with a minimum of 1m at its base, above the water table at its highest recorded level through the WINTER MONTHS, (not just November). Drainage 'routes' are also shown in plans. To what depth are they to be dug? Also, the blue 'tank' storage areas?

iii) Although the permeable paving level strata and structures are apparently compliant with British standards, they have a depth.

They do not allegedly resolve the highwater table levels in association.

iv) From plans submitted these would appear to be as examples from drawings of 'Preliminary External Works' 9/9/2025. The calculations of layer depths are able to be calculated from updates from those plans to include: -

Non- Infiltrating (Tanked), Permeable Block Paving, Road/shared Parking, Permeable Paving, the total of layers depth in related plan is: - **1.85m**

Acceptable Carriageway Construction, total of layers in plan is: **0.718m.**

v) As can be seen both those depths would conflict with the 0.27m as highest level quoted by Ibex for Odyssey for the water table, over 6 months (not just Nov. 2024). A level of 0.27m repeated in both the original details and in revision now. The 'logging data' appears to relate to Nov. 2024 and is allegedly repeated in 'revision' too, and the 0.27m. high water level in text.

vi) The bottom of those 'permeable layers' would allegedly have insufficient clearance of 1m. above the water table highest recording, required for compliance, for any structure of filtration from the diagrams, shown for pavements and roads.

vii) 'Manholes' advised by the designers as typo from .27 to 3.27m may also be a difficulty ref. depth requirement as above.

viii) Plans of 'Levels' to indicate that flow into the field ditch would be the same as currently does not apparently take account of the 250 dwellings already draining into that ditch from the development above. 420, if the application is approved.

ix) It is also in objection that although copious details have now been submitted to suggest that all run-off difficulties can now be resolved by details supplied in 'revision' ref. drainage, they would allegedly be premature. Unfortunately, none of the suggestions can allegedly solve the highwater table as existing over time and in association. The suggested 'solutions' may now allegedly increase flooding. The NPPF states that if that is likely to be the case other sites should be found.

6.Conclusion

Although a large number of details have been added by the applicant, 'quantity' by itself does not equal resolution.

Yours sincerely,

Dilys Lownsborough

Nicola Oktay

From: Nicola Oktay on behalf of Planning
Sent: 09 October 2025 09:04
To: Planning.Responses
Subject: FW: Objection to Y/32/25/PL ref recent updates included by the applicant - Lownsborough
Attachments: Objection to y 32 25 PL Sept 2025.doc

REP

Nikki Oktay
Planning Receptionist, Planning Department









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

To register to receive notifications of planning applications in your area please go to <https://www1.arun.gov.uk/planning-application-finder>



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	 
--	---	---	--	--

From: [Redacted]
Sent: 08 October 2025 20:17
To: Planning <Planning@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Objection to Y/32/25/PL ref recent updates included by the applicant - Lownsborough

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Dear Planning,

Please find as attachment objection details to Y/32/25/PL ref updates included by the applicant Redrow.

Kind Regards
Dilys Lownsborough