

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

June 21st 2026

Ref. Proposal of Variation of Conditions 2,14,15,22 and 23 etc.,
for Barratt Redrow Southern Counties planning application
Y/80/25/S73, for 170 houses for Land West of Bilsham Rd. BN18
OLA.

OBJECTION

Introduction

I object to the application for 170 homes under Y/80/25/S73, containing items for proposed amendment to conditions. This objection relates particularly to '*Condition 22, Ecological Mitigation and Enhancement*' as referenced in the Cover letter submitted by the agent on December 12th 2025.

On the grounds of public safety, flawed environmental deliverability and un- addressed long- term outcomes in relation to bio- diversity (BNG details submitted with the application) in association.

1.The Tetra Tech Report Biodiversity Net Gain Assessment Content (Version E) 2/6/2026

- a) The Tetra Tech report was undertaken for Barratt Redrow Southern Counties (not a Ltd. Company). Barratt Redrow (PLC) are understood the owners of the site alternatively.
- b) The report was to undertake a Biodiversity Net Gain Assessment (BNG) for 'The Land West of Bilsham Rd. Yapton

BN18 0LA'. An incorrect postcode for the site as being approx. 1/3 a mile away and to the East. Easting and Northing Grid/0S references in the Application are also given for Grevatts Lane West. An error which has continued unchanged in all applications for the site, including the Boklok application Y/52/23/PL submitted on 24/5/2023, as subject matter for condition amendments.

c). Under 1.2.1, the Tetra Tech view on Biodiversity in relation to development states: - *'Development which leaves biodiversity in a better place than before'* (Baker 2019).

d) Details supplied are allegedly to the contrary. In the applicant Location Plan1000 (2/12/25), a ditch, (watercourse) is shown as running alongside the 'proposed site' to the West.

e) The Tetra Tech report refers to the presence there of '**Hemlock water-dropwort**, (also known as 'Dead Man's Fingers'), in the ditch. In the report under item h2.50 'The Ditch', 3.1.14 page 3, continues:- '**The ditch supports an *abundance* of Hemlock water- dropwort**. There is no indication included as to its toxicity and serious potential harm/death to humans and some animals, which is also considered a serious omission in reportage.

f) **That plant type is allegedly the most toxic in the UK**, and its proximity to footpaths, play areas or residential streams/watercourses, poses severe risks to the public, curious children and pets, and should not be allowed to grow near accessible housing areas.

g) **Hemlock water- dropwort** is a Serious Risk to Public Health and as such, is considered a Material Consideration in planning review.

h) **Toxicity:** All parts of the plant, especially the roots contain deadly toxins that attack the central nervous system.

i) **Misidentification:** The roots resemble parsnips and the leaves to celery or flat-leaved parsley. Ingestion has historically led to fatal human poisonings, when foraged by mistake.

j) **Contact dermatitis:** Simply touching the plant's sap can cause rashes and blisters. (*Environmental Controls*).

k) Although specialists are required to remove it, terminal removal of the plants is not considered possible, because the smallest root part remainder can regrow, and seeds are born by water and wind. It is acknowledged as an 'ongoing matter' of long-term vigilance. The watercourse going Southwards off site also enters the large pond of a private dwelling in Bilsham Lane.

l) 170 houses if developed will bring hundreds of individuals including children and pets into this area and bring them into contact with **Hemlock water-dropwort** and its inherent toxicity. If the LPA are minded approval of this application, who is to take responsibility for this, or if a death or deaths occur in result?

m) It is understood that the LPA cannot grant planning permission in such situations without a **Site Safety Liability Assessment**. This matter cannot allegedly be dismissed as a minor issue when public lives are at risk, (*My Council.org. uk.*)

2. The Technical Impossibility of Eradication of Hemlock water-dropwort, Due to Shared Ownership

a) The Tetra Tech report for Barratt Redrow Southern Counties confirmed that the plant in question is present as stated. On the Layout Plan of the site submitted, the watercourse allegedly appears to be shared by third party ownership, because the red

boundary line is indicated in the middle of the watercourse. Riparian ownership and responsibility by 2 parties in result.

b) **Hemlock water-dropwort** reproduces through water-born seeds and root fragments travelling downstream. (*Environmental Control*). In the report under 'Wetland Meadow Mix' it refers to proposed water areas (attenuated ponds), and bog-loving plants in rain gardens proposed by 'Pegasus' as remedial measures intended for run-off drainage from houses on the site. A haven environment for the plant too.

c) It has been advised additionally that some surface water is to be channelled into the watercourse from 170 houses, but the BNG does not appear to acknowledge any additional water into it, nor any aspect of potential flooding in outcome.

d) Under 4.1.30 it refers to the Ditch, (watercourse) and its clear water quality. It makes no reference to the effect of the proposed run-off from 170 houses and any biodiversity detriment in result.

e) Glyphosate weed killer is often used to discourage the plant growth of Hemlock water-dropwort, but its use can also be damaging to the ecology of the watercourse and regarding invertebrates and other plant life. Mechanical removal of the plants can also damage the bank.

f) Even if the developer clears their side of the watercourse, the plant will consistently re-infest the site from the co-owner's land.

g) To obviate this, it is suggested that a joint, legally binding, Cross-boundary Environmental Management Agreement is made, before any planning approval is considered. Without, such a mitigation plan as indicated is allegedly completely undeliverable. (*Environmental Control*).

3. Failure to Achieve Biodiversity Net Gain

- a) It appears from the details submitted regarding BNG percentages in the Tetra Tech Report, there is no negative percentage ref BNG shown, regarding the Hemlock water - dropwort.
- b) It is understood that under planning laws, new developments must *improve* local nature. Because the plant is highly invasive in public spaces, its unchecked spread will allegedly degrade the watercourse habitat by 'taking over' other plant life. A degradation is not an improvement.
- c) BNG is not apparently a minor consideration in decision making and in association. It is advised that counter biodiversity measures have already formed part of recent Planning Appeal decision by Gov. Inspector L. Hughes regarding biodiversity matters of concern under APP/W4325/W/25/3373358 Land West of The Ridgeway CH4 9SA as of Feb.27th 2026, where the appeal was refused on the basis of unacceptable ecological disturbance.
- d) I also draw attention to the ADC Byelaws with reference to Land Drainage and in particular, to sections 8,16,22,24,25,26, 27 and the Penalty Notice section, which relates to what may be done to watercourses and by whom, and under what circumstance any legal requirements in association are to be implemented in outcome.
- e) It is hoped that the LPA would require the developer to submit a realistic Biodiversity Net Gain Strategy that also accounts for the permanent cyclical cost of managing this toxic plant species, without destroying the other wetland wildlife.

4.Future- Proofing Conditions Suggested in Remediation for Hemlock water-dropwort Control/Removal

a) It is understood that this is not a matter for the LPA ‘to look into later’. If the LPA is minded to approve the application, the following pre-commencement planning conditions are suggested: -

- * No development shall commence until a multi-seasonal eradication, and mechanical excavation plan is submitted and approved in writing by the LPA (*Environmental Control*).

- * Perpetual Monitoring Conditions with a legally binding 10-20 year Ecological Monitoring and Appraisal Scheme, to be instigated by the developer but continued by any subsequent Management Company for the site. This outcome would guarantee constant appraisal of the watercourse to catch re-infestation. (*Environmental control*).

- *Management Company Accountability: The future long- term maintenance and legal liability of the watercourse buffer zone should be assigned to a designated Company, ensuring that it never becomes the financial safety burden of the new homeowners or local taxpayers.

- * The site requires permanent appraisal (*Environmental Control*)
The LPA also has a duty of care.

- * It is requested that the application be refused until a cross-boundary safety strategy is legally secured with the third party, and that strict permanent monitoring and liability conditions are hard-coded into any future approval. (*Charette Law*) .

5. Potential Outcomes

a) As the presence of **Hemlock water- dropwort**, has been made public from the Tetra Tech report on the website, it is considered impossible to keep such allegedly concerning and potentially life threatening details from the public domain; as it cannot be confirmed that even after temporary 'removal,' is the end of its growth and it can return at any time.

b) Such environmental knowledge would not be conducive to house sales, as would also be required to be disclosed in the TA6 by the developer, and where ongoing vigilance regarding the offending plant would be required. Also, in relation to obtaining a mortgage, as lenders are allegedly wary of any detriments.

c) Such knowledge would also be a discouragement for house purchases by families with children and pets, and who would require knowing how such a factor would need to be monitored and controlled, ongoing cost, responsibility and insurance. Also, how insurance would need to be added to any management charge in case of accident.

e) Concerns already raised about Drainage, Flooding and Sewerage have yet to be resolved in this application. Exposure to one of the most poisonous plants in the UK additionally, on the doorstep of the proposed new houses cannot be dismissed.

f) It is hoped that this aspect will also be reviewed by Environmental Health, Environment Agency the ADC Byelaws/ other appropriate Consultees and the ADC Planning Committee in due course, who maintain a wider view of an area than just planning specifics. Also, that all appropriate safeguards are included with any condition amendments to item 22.

Yours sincerely,

Dilys Lownsborough

[REDACTED]

From: Daun Johnson on behalf of Planning.Responses
Sent: 23 June 2026 13:09
To: Planning Scanning
Subject: FW: Contamination of water course, planning application Y/80/25/S73 Land West of Bilsham Rd. Yapton Objection
Attachments: Contamination to Water Course on the site for y 80 25 S73.doc

Please upload attachment to Y/80/25/S73, planning, rep

Daun Johnson
Technical Support Unit Assistant
Planning Services

T: 01903 737762 Ext 37762
E: Daun.Johnson@arun.gov.uk



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

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



From: Daun Johnson <Daun.Johnson@arun.gov.uk>
Sent: 23 June 2026 13:06
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Contamination of water course, planning application Y/80/25/S73 Land West of Bilsham Rd. Yapton Objection

Daun Johnson
Technical Support Unit Assistant
Planning Services

T: 01903 737762 Ext 37762
E: Daun.Johnson@arun.gov.uk



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

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



From: Daun Johnson **On Behalf Of** Planning.Responses
Sent: 23 June 2026 11:49
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: FW: Contamination of water course, planning application Y/80/25/S73 Land West of Bilsham Rd. Yapton Objection

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Daun Johnson
Technical Support Unit Assistant
Planning Services

T: 01903 737762 Ext 37762
E: Daun.Johnson@arun.gov.uk



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

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



From: Elaine Walby <Elaine.Walby@arun.gov.uk> **On Behalf Of** Planning
Sent: 22 June 2026 09:40
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Contamination of water course, planning application Y/80/25/S73 Land West of Bilsham Rd. Yapton Objection

Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

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

To register to receive notification 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



Our core foundations




Connect with us: [Facebook](#) | [X](#) | [Instagram](#)

From: [REDACTED]
Sent: 21 June 2026 11:56
To: Planning <Planning@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Contamination of water course, planning application Y/80/25/S73 Land West of Bilsham Rd. Yaptan Objection

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 see attachment ref. Y/80/25/S73. Ref contamination of the water course.
Kind Regards
Dilys Lownsborough