

The Potting Barn
No. 5 Hobbs Court
Bilsham Rd.
Yapton

West Sussex BN18 OJY

July 23rd. 2026

**Planning Application Ref. Y/80/25/S73 for Variation of
Conditions 2,14,15, 22 and 23 as imposed under Y/52/23/PL
etc., for Land West of Bilsham Rd. BN18 OLA**

OBJECTION

Disclaimer:

I am unable to give legal advice as not qualified to do so, so the enclosed are personal opinions and details, also provided from sources of reference, the applicant and others. Aspects contained as 'Opinions' and 'Objections' are for further query, reference, and investigation.

**Objection: The Planning Application Content Location by
Barratt Redrow Southern Counties Uploaded on 22/12/2025
and in Association with the S73 for Y/80/25/S73**

Dear Planning,

Introduction

a) I have submitted several Objections regarding the Planning Application for Y/80/25/S73 and outcomes since Jan. 2026. It is regretted that despite highlighting the incorrect site postcode and address and outcomes, nothing has been undertaken to correct it, by the agent for 'Barratt Redrow,' /Barratt Redrow Southern Counties or the LPA, or before 'validation'.

Any alleged incorrect action by the above, or unresolved inconsistencies, have become more acute with the advent of the

proposed Planning Committee Meeting or for ‘decision day’ stated as July24th 2026.

b) On 3/6/2026, the agent for Barratt Redrow PLC/Barratt Redrow Southern Counties (‘Ltd’. not shown or indicated), submitted a response to the Planning Officer concerning the earlier Rep. Objections for Y/80/25/S73. The last Rep. Objection on the website prior, was 27/4/2026 at the close of the earlier Consultation.

c) Anyone may express an opinion, but evidential facts submitted by Objectors cannot allegedly be discounted, because they do not perhaps find favour. A response is required to the latest agent comments by the public to ensure fair play.

1. Validation of the Application Form for Y/80/25/S73

a) I refer again to the Rep. Objections of 23/1/ 2026 and 27/1/2026, ref. the **Planning Application Form** details. Also, in association with the S73, for application Y/80/25/S73, with proposed amendments to conditions in Y/52/23/PL. (The application approved on Appeal by the Gov. Inspector, Dec.10th 2024, confirmed on Jan. 24th 2025).

b) The Site Location Section on the Planning Application Form for Y/80/25/S73 states: -

‘If you cannot provide a postcode, the description of site location must be completed. Please provide the most accurate site description you can, to help locate the site – for example, ‘field to the North of the Post Office’.

And- ‘A Description of site location must be completed if the postcode is unknown’.

c) **The agent inclusion on the Planning Application Form description states: - 'Land West of Bilsham Rd. Yapton, BN18 0LA'. And- 'Easting 497545, and Northing 102448'.**

d) This is incorrect in outcome, as restated from earlier Objection and now: -

The postcode reference on the Application Form, BN18 0LA, is for Grevatts Lane West approx. 1/3 mile from the 'proposed site'. It is a domestic road (not a field) and to the EAST of Bilsham Rd.

e) The Easting and Northing references for BN18 0LA are: - Easting 497363 and Northing 101937, and in contradiction to those on the Application Form.

f) Residents would not routinely be aware of Grid references, and those presented in the application, would be assumed to be for Grevatts Lane West as submitted with the postcode. Postcodes quoted, need to confirm location sites accurately, without any discrepancy or differential.

g) **The detailing submitted is considered a major administrative error because: - The incorrect postcode, BN18 0LA for Grevatts Lane West, was also in the applications for Y/52/23/PL, Boklok,- (24/5/23), Y/15/24/MA,-(9/2/24), Y/32/25/PL,-(1/5/2025), and Y/80/25/PL,- (22/12/25).**

gi) **That this factor has not been corrected over approx.2 years, raises serious questions as to why, and how this relates to the S73 and alleged legalities in connection. See Item 4 below.**

h) Although there is no direct postcode for a field, nearer and more appropriate postcodes were available as reference locations: -

i) Bilsham Rd. is the only road named on the Location Plan1000, as relevant, with an arrow indicating North. Absent, is reference to Bittern Avenue BN18 0BW on the Thakeham site for 250 houses immediately above the ‘proposed site’. Also not referenced, is Taylors Close, BN18 0FN opposite the ‘proposed site’. ‘

j) Grevatts Lane West corresponding with the stated postcode BN18 OLA is not shown on the Location Plan. (it is round the corner to the EAST). Another field of similar size to the 'site' *is* opposite Grevatts Lane West, (West of Bilsham Rd.) for further confusion.

k) 'Bilsham Rd'. is approx. one and a half miles long. From the A 259 at Comet Corner to the B2233 in Yapton centre. There are other fields to the West and East adjacent to Bilsham Rd. in its length. 'Land West of Bilsham Rd.' otherwise, is allegedly insufficient detail because of this. Without more clarity in description, the details provided are allegedly confusing.

l) The planning officer responded to me in email ref. postcodes query on 6/3/2026:-

‘It is my understanding that postcodes are not fixed, rather they are dynamic. New codes are created for new development, and existing postcodes may expand or contract depending on changes to an area. On this basis it may be that the postcode quoted was originally the correct one but has since reduced in size. I have no way of knowing this but in any case, whether or not the postcode is wrong is immaterial and not a planning issue. The site location was clearly described by the location plan and met our requirements’.

I was also advised that the red outline matched the Grid reference and that the details in query would not be changed.

li) This response is in Objection because there is no ‘dynamic’ expansion or contraction regarding postcodes in that area. The LPA may decide that some concerns are ‘not a planning issue’, but such decisions are not exclusive or definitively made by them and cannot rule out the public view in decision-making or any alleged legal requirements otherwise.

lii) Also, the final arbiters for this application are understood normally to be the ADC Planning Committee, who assess all matters in review, not just those of ‘planning considerations’.

liii) **Any errors put out on the Application Form, Location Plan, and in the heading on the Website, may also have an adverse bearing on the S73, which is a planning matter. See also Item 4 below.**

m) The email comment by the planning officer is unable to be sustained, because historical records state that original development in Grevatts Lane West was between 1950 and 1970s again in 1980s. (*British History online*).

mi) Postcodes in the area were commenced between 1954 and 1970. Hobbs Farmhouse, (further on from Grevatts Lane West), which dates from the 18th century and before any houses at Grevatts Lane West were built, has the same postcode as for Hobbs Court, as BN18 0JY. There was no ‘spread’ from Grevatts Lane West postcode, because it could not have been made *before* that of Hobbs Farmhouse existence round the corner in Bilsham Rd.

n) High Court judgements from Judicial Review have quashed approvals, if incorrect details such as street names or ‘mistakes of fact’ have been incorrectly made. (*Landmark Chambers*).

ni) Any alleged assumption by the LPA that 'everyone knows' the 'land' is owned by Barratt Redrow from the Location Plan 1000, (22/12/2025) and the red outline as 'conclusive,' is perhaps misplaced. The Application Form is the first information supplied. The red boundary line details are not on the Application Form.

nii) The Location Plan 1000, (22/12/2025) on the website with the red line outline boundary of the site, is item 10. The LPA may be aware of the 'site' 'routinely', but it is the public that need to be notified in an unambiguous way and in relation to any legal requirements and in a public Consultation.

niii) The site Location Plan 1000 denotes 'Redrow' and the Application Form states 'Barratt Redrow Southern Counties'. A name in a planning application is understood does not have to be the owner of the site or ultimate developer. But Land Registry Title docs. in confirmation are understood can take up to a year to be made public regarding certainty of land ownership.

niv) Planning Application Forms are allegedly vetted for accuracy before validation can occur. As known to be incorrect in content, it is questioned why this was not rectified for Y/52/23/PL and Y/80/25/S73 particularly, before 'validation'. **See Item 4 below in connection with the S73 application for Y/80/25/S73.**

2. The Yellow Notices for Y/80/25/S73 also referred to Previously. But Also Allegedly Ignored in Outcome by way of Remediation.

a) Yellow notices advertising planning application sites, routinely contain postcodes. When questioned, the planning officer allegedly advised that the postcode had *not* been included in the yellow notice for Y/80/25/S73.

b) If that is so, then the stated address on the Application Form and the heading on the website description were not published correctly in the yellow notice, or in line with legal requirements.

c) The Town and Country Planning (Development Management and Procedure) (England) Order 2015 states, ‘That the correct site address is clearly displayed on the site notice’. (Planning portal).

d) Accurate Address and Postcode: ‘It must state the exact official address of the property or land, *mirroring* what is on the formal application form’. (Gov legislation).

e) Either the incorrect postcode address was submitted on the notices, or it was excluded. Either action would allegedly raise the possibility of de -validation in a Gov. Inspector or Judicial Review, allegedly in terms of legal aspects for public review regarding 2 completely different locations for the same development. The development ‘approved’ with the incorrect postcode for Y/52/23/PL cannot allegedly be undertaken in Grevatts Lane West.

f) The regulations ref. yellow notices are to ensure that details are displayed for all those in the area to have correct information, not to remain unaltered in correction for approximately 2 years. If any new yellow notices are put up now it remains to be seen as to content.

g) Any alternative advice from the LPA that does not allegedly echo statutory details ref yellow notices is in Objection because: -

‘It is understood that the LPA has a legal obligation to ensure the public register is accurate and that local consultation is based on the correct property’.

‘If the main heading on the website also indicates an incorrect location and postcode, it renders the consultation unlawful and invalid.’ (Planning Portal Blog’).

h) What the LPA may feel is sufficient for their purposes either for Application Forms, Website headings and Yellow Notices does not allegedly outweigh legal requirements in connection.

3. ‘Y73’ as stated in Response to the Rep Objection Letters by the Agent, 3/6/2026

a) The Agent refers to the Objection comment that the Planning Objections for the refusal of Y/32/23/Pl as allegedly would be assumed the same for Y/80/25/S73.

b) The agent response continues, mischaracterising details by referring to ‘Y73’ instead of S73. If now advised as a ‘typo’, it is not excused.

bi) Such referencing is in ‘Objection,’ as another alleged error submitted by the agent, regarding details presented.

c) **‘Y73’ is not part of this application**, but as referred by the agent, can be commented upon. It is allegedly part reference to an application submitted through the same agency, for Hobbs Farmhouse, Y/73/24/HH (Planning Officer Aishwarya Reddy), nearer to the site from Grevatts Lane West by approx. 50yds. A property not shown otherwise on plans or referenced for Y/80/25/S73.

d) The details submitted for Y/73/24/HH were submitted incorrectly in the Location/Site Plans, ref. land, and property ownerships. They were required to be corrected by the LPA as under its Rev A.

e) The agent letter comment to the planning officer then, in response to an Objection, put out on the public website, indicating incorrectly that the Rep Objector did not apparently know the ownership of part of their land. It referenced an earlier Land Registry document as if current, but it was from before the objector property was purchased instead.

f) It is noted that 'Y73' is an error now included with details by the agent, seeking to correct Objector details for Y/80/25/S73. 'Corrections' to Rep. Objections by the agent need to be accurate, especially when in the same 'area' of an application.

4. Incorrect Details regarding the Heading /Address/ Postcode and in relation to the S73

a) Independent details (AI) as follows: -

'In an S73, if the LPA formally changes the postcode later, they risk creating an irreconcilable conflict between the original 'operative description' of the development, and a new permission, which could invalidate the entire chain ((as in the applications from Y/52/23PL onwards)). While the LPA may claim a red line boundary is sufficient, a postcode error which allegedly misleads the public by 1/3 mile, severely breaches statutory publicity and statutory laws' (#Planoraks).

b) Also referred in earlier Objection, the Landmark Ruling by Lord Justice Holgate who observed that that although amendments can be made to conditions from an approved application, other details of description cannot be changed without allegedly rendering the process unlawful.

c) That no change was made to the incorrect postcode and attendant address initially for Y/52/23/PL when it was easy to do, is not explained nor why it continued subsequently.

ci) Leaving an error which should have been corrected long ago, is because to remove the details would allegedly nullify the judge's ruling ref. the S73 and in association. Also ref. another ruling....

d) Finney v Welsh ministers is another Landmark ruling, by Judge Lewison LJ: -

'A Section 73 application cannot alter the 'operative description' of the location of the development as established in Finney v Welsh Ministers (Nov. 5th 2019). The S73 expressly requires the planning authority to consider only the question of conditions' (Howes Percival solicitors, Lichfield blog).

Lewison LJ ruling: -

'The Court of Appeal Judgement has found that the natural inference from that imperative is that the planning authority cannot use section S73 to change the description of a development'.

e) Because the Postcode and associated Address explicitly denote a domestic Rd. 1/3mile way from 'The Site' and not the field intended incorrectly, irrespective of a red line boundary, those details required change and correction from the start for Y/52/23/PL and onwards.

ei) However, if the application postcode/address is changed now, it cannot allegedly legally be approved under Section 73. (A1). The judge also suggested a completely new application should be considered if description details require change, whereby all such impediments could be eradicated.

f) If the incorrect postcode/site details remain in error, but at the same time advised by the LPA as not considered important, why have they remained?

fi) Perhaps because of the outcomes from the above ruling, which does not resolve the difficulty of the incorrect detailing.

fii) That the Northing and Eastings are indicated as for Grevatts Lane West, but in fact for a field in Bilsham Road, is a further complication. Correcting the address would also allegedly create an inherent conflict to the original Planning Permission, allegedly rendering the S73 invalid.

g) It appears that the LPA allegedly have 3 choices.

-(1) To leave the details as they are, and risk De-validation or a Judicial Review which may be costly in time and outcome. Also regarding any Gov. Inspector Review for Y/52/23/PL and ref. the proposed conditions amendments submitted for Y/80/25/S73.

gi)- (2) To change the details in the postcode and accompanying address in association, but by so doing would be against the legal requirements for an S73 and nullify it.

gii)-(3) To make the applicant start afresh and put in an entirely new and 'un- compromised application'.

h) As stated, I cannot give legal advice myself, but I can request that all the legal matters in association are looked into, to ensure that the LPA and developer outcome decisions are lawful, and not in conflict with any Landmark court rulings or other legalities regarding details put out to the public.

5. Other Considerations

a) It is considered right to question alleged repeat errors in the Planning Application Form/s/details, and to question why the LPA have declined to ensure that the correct details were supplied instead, in an equality of approach for all.

b) This situation has allegedly created a 'material inaccuracy' (subject to review by legal experts).

c) The agent's reference of 3/6/2026 regarding the Rep Objections response has brought the alleged errors in application content to the fore again for attention, and with aspects which can be raised in a legal challenge.

Thanking you for your kind attention.

Yours sincerely,

Dilys Lownsborough

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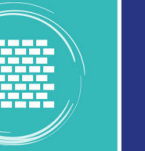
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From: Breezie Allwright <Breezie.Allwright@arun.gov.uk>
Sent: 24 July 2026 15:11
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Fw: Incorrect site location and legalities in relation to the S73 for Y/80/25/S73 Land West of Bilsham Rd.

Breezie Allwright
Planner Degree Apprentice, Planning Department
T: 01903737889
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Please note my working days are Monday, Tuesday, Wednesday and Friday.

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From: Breezie Allwright <Breezie.Allwright@arun.gov.uk> on behalf of Planning <Planning@arun.gov.uk>
Sent: Friday, July 24, 2026 15:02
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Fw: Incorrect site location and legalities in relation to the S73 for Y/80/25/S73 Land West of Bilsham Rd.

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From: [REDACTED]
Sent: 23 July 2026 20:14
To: Planning <Planning@arun.gov.uk>
Subject: Incorrect site location and legalities in relation to the S73 for Y/80/25/S73 Land West of Bilsham Rd.

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Dilys Lownsborough