

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

September 30th. 2026

REF: - Application Y/80/25/S73 Land West of Bilsham Rd. Ref. recent additions to Layout and Drainage.

OBJECTION

Disclaimer: As I have no legal qualifications, I cannot give legal advice. The content contains my views and concerns. All details must be checked for independent verification.

Introduction

The enclosed emails content is taken from the second EIR request. Response received 24th September 2026, following on from the EIR response of 24th August 2026, and the Objection entry of 28th September 2026. **-last timetable entry 10th September 4.25pm. 2026, -** continues as follows: -

1).14th September 2026 16.20 pm. From: Blanked out name, to Blanked out name. Recipient: *arun.gov.uk*. Correspondence assumed to be between, ADC Principal Planning Officer Director of Growth, and Associate Technical Director RSK Geosciences.

The following details relate to a request from RSK Geosciences to the ADC Principal Planning Officer, for assistance with their **Hydrogeological Assessment**, for Barratt Redrow Southern Counties, (no Ltd. included), as follows: -

1a) 'Good afternoon. *We are working with Barratt Southern Counties on a site of theirs at Bilsham Rd. Yapton, and we understand that you have provided feedback to their development proposals with concerns over the impact of groundwater from proposed raising of site levels.*

One of the comments mentioned states: -

There is significant ground-raising proposed on the site. The FRA is not clear about the extent or details of the raising. Example wording of ‘at least 1.2m of raising’. The impact of this raising on flood risk and hydrogeology, has not been adequately assessed.

We would like to assess the concerns by way of a summary hydrogeological assessment and trust you can provide some guidance as to the exact requirements /expectations. Is the concern associated with the loading of the existing ground from placement of the fill material? Or is it more due to the potential impacts of a low permeable fill being place which could prevent infiltration of surfaces run-off into the underlying natural ground?

We understand that there were issues/concerns on a nearby site, following level raising but we are not sure what the nature of what these were. A clarification you can provide would be greatly appreciated so we can be sure we are addressing the concerns correctly. I am happy to speak over the phone or on Teams if that is preferable’. Signatory: Associate Technical Director, RSK Geosciences.

1b) Direct Objection. It is observed that: -

- Barratt Redrow Southern Counties, (no Ltd. included) submitted their application for Y/80/25/S73 on 22nd. December 2025 and have had approx. 9months and 5 EOTs, until the last, for 23rd. October 2026 to resolve drainage difficulties. So far, without notable success. It is not for ADC to resolve those difficulties on their behalf.

2).15th September 2026 12pm.From: Blanked out name, sent to Blanked out name. Correspondence understood to be a *response* between the ADC Principal Planning Officer Director of Growth to the Associate Technical Director RSK Geosciences. The exchange, in result of the request, by the latter of 14th September 2026 above, is as follows: -

2a) ‘*Dear (Blanked name), This came about following a comment by our Drainage Engineers. ((The actual text was also emboldened as follows))*: -

0.3. There is significant ground raising proposed on the site. The FRA is not clear on the extent or detail of the raising. Example wording, ‘of at

least 1.2m' of raising. The impact of this raising has on flood risk, and hydrogeology has not been adequately assessed. The planning officer may consider the visual impact of the elevated levels on the site. For example, plot 26 which is raised from 6.13mAOD to 7.6mAOD these increases are replicated elsewhere on the site.

It was then repeated at a Teams Meeting in August that I was not able to be at. I understand that the point was made by our Engineers that elsewhere in the district land levels had been raised and impacted on neighbouring sites. The Engineer said it was a Redrow site but did not give the address. A question was asked what impact the ground-raising would have on ground water flows and whether these would be displaced causing off site flooding. The risk in this case was highlighted to Bilsham Rd.

I have assessed the proposed levels changes on the site concentrating on the plots to the northern and eastern edges (to assess visual amenity) and it appears to me the biggest rises are as follows: -

- Plot 26 with be raised from an existing ground level of 6.13m to an FFL of 7.16m (1.47m).*
- Plot25 will be raised from 6.1m to 7.1m (1m).*
- Plot28 will be raised from 5.77m.to7.5m (1.7m)*

The rises along the eastern edge to Bilsham Rd. appear to be in the range of 0.4m and0.95m. I will forward to our Principal Engineer (Blanked out name) and ask (Blanked out name) to respond to you also.

Kind Regards'

Signatory: ADC Principal Planning Officer Director of Growth.

2b) Direct Objection.

- Although pre-application advice can be given by external sources, it is understood *unlawful* for planning or other officers to give advice for an applicant/application, once an application is **'live'**, as now.
- Agents are anticipated to submit details **to** the council on behalf of client. Not to request and receive assistance and technical expertise and guidance from ADC Departmental staff instead.

- ADC departmental staff are not paid to support applicants to resolve their planning difficulties, using 'public funds' to do so. Nor as unofficial employees of the applicant or their consultees. In this instance, regarding drainage difficulties, currently unresolved.
- The details from these exchanges have been withheld from the planning portal for public comment and review. (Only now uploaded to the portal because EIR details have been submitted by an objector).
- The email above including Plot heights, ground raising and flood issues comments/ concerns by the ADC own Engineers submitted, indicated above, has not been added in total the portal by way of report, as of today's date, (30th September 2026), for review and comment, before the advised closing date for Rep. objections, on 8th October 2026.
- 'Behind closed doors' meetings content and discussions have only been brought to public attention through Environmental Information Regulations requests now. Without, the public would remain in the dark.
- This outcome allegedly raises concerns regarding exclusion of public involvement- bias, predisposition, procedural deficiency, maladministration, conflict of interest and allegedly unlawful.
- The ADC Drainage Engineers last submitted an objection report to the planning portal for Y/80/25/S73 on 15/7/2026, (actual document dated 10/7/2026). Time is now pressing, for them to release any update report for public review and comment, which has allegedly stalled, in the light of 'meetings' and discussions.
- However good the intentions- 'public money' being used to 'support' other businesses, allegedly raises concern about ethics, and allegedly 'crosses the line' regarding 'predisposition,' 'pre-determination' and 'conflict of interest'.

- The report from RSK Geosciences was uploaded onto the portal on 29th September 2026 under 'Groundwater Impact Assessment'. (9days before the 8th October Consultation closing date, not, 14 as advised).
- **Unlawful use of the (Finney Anchor).** Resolving structural engineering-level drainage conflicts in 'behind closed doors' meetings, while using an S73 vehicle, to avoid a comprehensive public-facing Flood Risk Assessment update- is allegedly entirely unlawful, [Y/80/25/S73]. Major alterations to the site's capacity to handle floodwater, fundamentally change the development's impact, allegedly meaning an S73 cannot legally be used [Y/80/25/S73].

3).15th September 2026.12.05 pm. From: Blanked named sender but from *arun.gov.uk*. Blanked named recipient. Correspondence understood to be from the Principal Planning Officer Director of Growth to the ADC Principal Drainage Engineer Coastal Engineers and Flood Protection as follows: -

3a) 'I've had a request below, from the company Barratt Redrow have appointed for the hydrogeological assessment, as he is asking me questions, I can't really comment on. (I've sent a response, but I think some of the things need a drainage answer). Can you either reply direct or respond to me so I can pass on?

Signatory: Principal Planning Officer Director of Growth.

3b) Direct Objection.

- Confirmation again that an ADC officer is engaging to assist Barratt Redrow through ADC own resources, (and with an ADC Drainage Engineer), the outcome of which was only able to be assessed from the EIR request details. Full text above, apart from salutations.

4).15th September 2026 12.48pm. From: Blank named sender but from *arun.gov.uk* to ADC Drainage Engineer. Correspondence understood to be between the Principal Planning Officer Director of Growth, to the Principal Drainage Engineer Coastal Engineers and Flood Protection: -

4a) *'Any chance of providing a draft response to them since you are familiar with their application I can add anything to it regarding the Redrow site in Barnham'.* Signatory: ADC Principal Drainage Engineer, Coastal Engineers and Flood Protection.

4b) Direct Objection.

- As stated, planning applicants are anticipated to do their own investigations to avoid a conflict of interest and any hint of predisposition or pre-determination in decision- making for an application.
- The above email allegedly also exposes that the Planning Officer's primary anxiety is not protecting the local environment from flooding, it is hitting an arbitrary deadline for the developer.
- By indicating on 15th September 2026, that the Planning Officer still lacks the basic readable **side elevation levels (separate line drawings)**, to assess the 1.2m. ground- raising, allegedly proves that the application currently out for public consultation, is structurally empty. To consult on invisible engineering works, is considered, may also allegedly be unlawful.

5). 15th Sept 2026, 14.01pm. From: Emma Ringshall, (ADC Principal Drainage Engineer Coastal Engineers and Flooding). Her name was emboldened at the top of the header. **Hydrogeological Assessment,** (Draft) to the Principal Planning Officer, as follows: -

5a) *'It is encouraging to hear that Barratt Redrow Southern Counties ((no Ltd. advised)), have engaged a consultant to assess the site levels on groundwater. I would hope that you have access to all the ground investigations that have been undertaken on the site. The assessment will need to be informed by site specific monitoring and surveys. Furthermore, you should have access to the surface water drainage design which includes lined open drainage features. The critical thing the ADC will be assessing is whether the groundwater is flow paths, surface water run- off, ground water levels, or groundwater emergence on adjacent land/ highways, and/or affect water features (proposed or existing). The*

hydrogeological assessment should explicitly demonstrate that the effects have been investigated and quantified.

It is suggested that the report includes: -

Baseline Hydrogeology

1. Conditions.

2. Ground investigations and monitoring.

3. Characterisation of ground- water regime including seasonal range, groundwater flow directions connecting with the nearby water course, hydraulic gradients illustrated with plans and cross-sections.

4. Qualitative assessment of the proposed ground-raising, does it alter the recharge rates? Reduce infiltration? Create a barrier to groundwater laterally? change groundwater gradients? Increase emergence of groundwater at site boundaries/ change interaction with adjacent drainage systems? (both during and post construction?).

5. Assessment of proposed fill material. Considering thickness of fill, permeability of fill comparability between fill and existing ground, degree of compaction, presence of low permeability layers. Will the introduction of fill act as a drain, a storage medium, or a barrier to groundwater flow.

*6. The Offsite Risk Assessment. **Could the groundwater rise on the neighbouring land because groundwater is displaced by the raised development platform?** ((NB. It is not just Bilsham Rd. The Thakeham Wildbridge site with 250 houses is directly above the North of the proposed site. There is another development opposite in Bilsham Rd. at the northern most 1/4 part of the site, too. Continuing Southeast, a field with livestock. Going further South, Hobbs Court immediately below to the Southeast of Bilsham Rd. too))..... text continues....*

Consider adjacent properties, agricultural land. foundations, existing drainage systems /water courses and ecological receptors. Consider climate change.

7. Surface water and groundwater interaction. Will the raised site change overland flow routes or increase run-off? Will groundwater locations move?

Will drainage ditches or streams become more reliant on groundwater discharge? Will groundwater flood risk change?

8. Any Suggested Mitigation Measures?

9. Clear Conclusion. The final report should explicitly answer what are current groundwater levels and seasonal fluctuations.

How will raising the site by up to 1.7m alter ground flow?

Will groundwater be displaced on to neighbouring ground?

Will groundwater rise or fall on neighbouring sites?

Will rates quantities of surface water run-off onto lower lying adjacent land be increased?

Is groundwater mounding likely?

How certain are the conclusions?

What monitoring and mitigation are required.

With regards to the neighbouring site. the example used anecdotally ((at the meeting)) was the Redrow site in Lake Lane Barnham, whereby site ground levels were raised significantly to facilitate the development. This appeared to have directly impacted groundwater levels in an existing low-lying neighbouring development/property garden, where a very shallow water table already existed and appears to have been elevated in result.

Essentially the property owners suffer from saturated gardens during the winter which they did not experience before Redrow's development, also resulted in overland flows running off the site onto the lower-lying development impacting those closest to the site boundary, forcing some homeowners to implement their own measures to protect their properties.

To this day, the issues on the development have not been resolved (despite approaches to Redrow at the time) and has resulted in numerous complaints from residents. No hydrological assessment has been carried out. Issues like this, have prompted us to consider how the impacts of ground- raising are better addressed.

Regards Emma Ringshall Principal Drainage Engineer Coastal Engineers and Flood Preventions'.

5b) Direct Objection:

- The 'Extra Consult Conflict': -The above sequence allegedly provides direct evidence of the council violating its negative role. By actively feeding internal engineering concerns to RSK Geosciences, to help them troubleshoot their own application mid- stream, the planning department is acting as an extension of Barratt Redrow's development team rather than an objective regulatory body. [Y/80/25/S73].
- Subverting the Independent Consultee Process: - internal drainage and flood prevention officers are statutory protectors for the existing community. By allegedly managing and softening the Principal Drainage Engineers technical objections through private, work-around with RSK Geosciences, the Planning Officer is allegedly actively neutering the councils own flood safety checks, to seek to ensure that the S73 does not collapse publicly. [Y/80/25/S73].

6). 15th September 2026 14.41pm. From: Blanked out names for sender and recipient. Correspondence understood to be content provided by ADC Principal Drainage Engineer Coastal Engineers and Flood Prevention and forwarded by the ADC Principal Planning Officer Director of Growth. Correspondence destination understood to be to RSK Associate Technical Director Geological Sciences.

6a) Stated as 'Draft' by the ADC Principal Planning Officer. A much-reduced version of the earlier offering above on 15th September 2026 from Emma Ringshall was sent. It advised the measurements again also specifically mentions difficulties through ground- raising at Lake Lane in Barnham at another Redrow development.

7).15th September 2026 15.34. From: Blanked names for email sender and recipient but Emma Ringshall name strap emboldened across as main heading. Correspondence assumed to be sent from her to the ADC Principal Planning Officer Director of Growth.

7a) *'Thank you, 'blanked out name' and 'blanked out,' presuming there is 'blanked out' input too. The outcome with be interesting.....'*

Signatory: Blanked out, but confirmed from the strap, heading as from the ADC Principal Drainage Engineer Coastal Engineers and Flood Prevention.

7b) Direct Objection.

- The is no definitive response/outcome to this questioning comment in the email trails provided.

8).16th September 2026 10.23 am. Blanked named sender, to-
arun.gov.uk. Ref.2193i.

- Section plans advised as being prepared to be sent in updated pack 'next week'. Confirmation of 21st October 2026 Committee Meeting and submission of details 30th September 2026'
- From the earlier meeting advice confirmation, that ADC drainage would be reviewing details as priority, because of 'work done already'.
- The hydrology report advised being prepared and sent end of week or beginning of next. ((Week commencing 21st.Sept.2026)).
Signatory: Associate Planner ECE.

8a) Direct Objection:

- The16th September 2026 correspondence allegedly exposed a disturbing narrative that allegedly undermines the integrity of this live application. ECE explicitly refer to 'work done' already, and with reference to the '9th September meeting'. An upcoming hydrology report is being prepared and due to be sent on 'next week' or following. There is no indication as to origins. It is assumed to be from 'Pegasus.
'Dated 17/9/2026 uploaded on 23rd September 2026.
- Evaluating a live S73 application based on details form un-minuted agreements and promised unseen structural reports in association, allegedly constitutes a breach of the council's statutory duty, to remain neutral and transparent.
- It is noted that these details were sent before the complete shut down to the ADC IT system from 18th September 2026 until late 20th

September 2026. They were not uploaded until 23rd/24th September 2026. As stated, the above details from that time in text above are only on the portal now, because they were received through an EIR request and responses pursuant in Objection.

- **From the actual planning portal:** It is noted that ‘**Site Boundary Sections 1171**’ were uploaded on 23rd. September 2026. These drawings may be helpful to satisfy the planning officer’s request, but they do not properly illustrate a proper house street scene and the proper environments to the North and East.
- Barratt Redrow will have the IT graphics package to show their house styles already..... at minimum now with a street scene, so that the elevations can be seen for comparison in a road between ground level and raised, not a bare minimum ‘indication’.

9).18th September 2026 15.06 pm. Ref. P2193i. Y/80/25/S73 From: Simon Davis, ADC Planning Officer, Paul Carnell, agent for Barratt Redrow. Email Details on the planning portal dated 24th September 2026.

9a) *‘Hi, I just have a query in drafting the report- did the amount of POS reduce or stay the same as the changes made in June? I can’t find anything to say what the POS area currently is’.* As follows: -

Signatory: ADC Principal Planning Officer Director of Growth.

9b) Direct Objection:

- The comment above is indicative that the report is already in process of being compiled indicated by the planning officer as- ‘in drafting the report’. The Consultation commenced on 23rd. September 2026. But no actual start or end date is stated on the planning portal. (8th October 2026 only advised to those who had previously objected, in email. Other residents were denied direct knowledge.
- **Update Details:** On 24th September 2026, in an email on the planning porta, Simon Davis, (ADC Principal Planning Officer Director of Growth), in email to the agent for Barratt Redrow Paul Carnell ECE states as follows: - An apology that consultation details were sent to the

consultees as recipients, as not his intention. He advised; *'I don't need a response from them, and... consultation advice could not be prevented from the public as already undertaken'*.

- That consultees were advised in that way, allegedly bypasses any comment regarding recent additions to the site particularly for Neap, Leap and Lap changes, submitted by the applicant on 23/9/2026, Ecology, and Environmental Health. House changes and to site layout, which has dramatically changed from earlier consultations..... The ADC Drainage Engineers report is still awaited.
- If the public and consultees are discouraged or prevented from commenting it is difficult to see that imposed constraints on consultee comments are fair and transparent and not overburdened by predisposition and predetermination.

10. Summary of Evidence

10a) The word for word correspondence, exposed in sections throughout, allegedly conclusively demonstrates that the Local Planning Authority abandoned its role as an independent objective regulator. By allegedly covertly hand-holding the applicant's private consultants ghost-writing technical responses, and suppressing known lateral flooding risks, from the public portal, the council has alleged committed a profound breach of procedural fairness and transparency. [Y/80/25/S73].

10b) The Section 73 application is allegedly fundamentally and legally flawed, structurally deficient, and cannot allegedly be used to bypass the rigorous scrutiny required for a major 1.2m. topographical alteration within the site, [Y/80/25/S73]. This objection will be followed by further critical pieces of procural evidence imminently.

10c) The upcoming supplementary submission will explicitly document the administrative and technical disaster that occurred in the immediate run up to, from Friday, 18th September 2026- late Sunday, 20th September 2026. The total collapse and blackout of the council's planning portal during this critical window, which completely severed the public statutory right, to access information, or submit objections.

10c) This digital blackout occurring in association with an upcoming compressed consultation period (14 days), presented a fatal procedural failure that allegedly questions the validity of the consultation period and withheld details to the public.

10d) URGENT POSTSCRIPT: LATE-STAGE EVIDENCE DUMP AND PROCEDURAL BAD FAITH (Submitted 30th September 2026).

As of today's date, 30th September 2026, a new, heavily biased, RSK Geosciences report of 29th September 2026, was suddenly slipped onto the public portal. A cursory review indicates a very interesting admission, that recognisable SuDS features appear to have been abandoned in favour of aggressive ground -raising and uncertain off- site drainage into the neighbouring ditches to displace water.

This late in the day addition coupled with a totally deficient unsatisfactory 'levels drawing' showing little more than an 'outline house with a dotted line under it' - alleged indicates beyond doubt that the council is conducting a live consultation on a fundamentally, mutating, incomplete consultation [Y/80/25/S73].

This also appears an attempt to bypass the public and statutory scrutiny, I reserve the absolute right to submit a comprehensive, forensically detailed, counter analysis of the RSK Geosciences report alongside my upcoming evidence regarding the 18th September 2026 weekend IT ADC planning portal blackout.

Yours sincerely,

Dilys Lownsborough

[REDACTED]

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

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<https://www1.arun.gov.uk/planning-application-finder>



[REDACTED]

Sent: 30 September 2026 21:15

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

Cc: Simon Davis <Simon.Davis@arun.gov.uk>

Subject: Objection to Y/80/25/ S73 changes to layout and drainage difficulties Land West of Bilsham RD.
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 further objection to Y/80/25/S73,ref meetings and procedural flaws and internal intervention to assist the applicant away from scrutiny.
Thanking you for your kind attention.

Kind Regards
Dilys Lownsborough