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From: Jorge De Silva [REDACTED]
Sent: 05 January 2026 10:23
To: Planning <Planning@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Objection to Planning Application S/80/25/S73 - Surface Water Discharge Rate and Downstream Flood Risk

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Dear Sir or Madam,

Re: Planning Application Y/80/25/S73 – Proposed Residential Development at Land West of Bilsham Lane, Yapton BN18 0LA

I wish to lodge a formal objection to the above application on flood risk and drainage grounds, specifically in relation to the proposed surface water discharge rate to the receiving watercourse.

The submitted Flood Risk Assessment and Drainage Strategy states a greenfield runoff rate (QBAR) of 12.73 litres per second, with a proposed restricted discharge rate of 12 l/s. While this is marginally below the stated QBAR, the reduction is de minimis and does not, in my view, provide meaningful betterment or adequately demonstrate that the development will not increase flood risk downstream.

QBAR values are derived from hydrological models and assumptions that are subject to inherent uncertainty. A reduction of only 0.73 l/s falls well within the recognised margin of error of such calculations and therefore cannot reasonably be relied upon as evidence of flood risk neutrality. Compliance with QBAR in numerical terms alone does not satisfy the policy requirement to ensure that development does not increase flood risk elsewhere.

Furthermore, QBAR represents an average annual peak flow and is not a flood-safe threshold. Discharging at or near QBAR during extreme rainfall events, particularly under climate change conditions, risks prolonging elevated downstream water levels and increasing the duration and severity of flooding, even where peak levels may not immediately exceed channel capacity.

Of particular concern is the absence of any robust assessment of the downstream capacity of the receiving watercourse, including any culverts, bridges, or other hydraulic constraints, and the lack of a cumulative impact assessment taking account of other existing developments already discharging into the same system. In the absence of this information, it has not been demonstrated that the proposed discharge rate can be accommodated without increasing flood risk to downstream receptors.

Paragraphs 167 and 173 of the National Planning Policy Framework require that development should not increase flood risk elsewhere and that sustainable drainage systems should be designed to control runoff at source. In my view, reliance on a discharge rate effectively equivalent to QBAR, without evidence of downstream capacity or meaningful betterment over greenfield conditions, conflicts with these requirements.

I therefore request that the Local Planning Authority either:

- refuses the application on the grounds that downstream flood risk has not been adequately addressed; or
- requires a revised drainage strategy incorporating a lower discharge rate that provides clear betterment below QBAR, together with a downstream hydraulic capacity and cumulative impact assessment, secured by an appropriate planning condition.

I trust these concerns will be given due consideration in the determination of the application.

Yours faithfully,

Jorge M. De Silva
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