

6th January 2026

JORGE M. DE SILVA
Manor Cottage
Bilsham Lane
Yapton
Arundel
BN18 0JX

Case Officer: Mr S Davis
Telephone: 01903 737874
Email: Simon.Davis@arun.gov.uk

Dear Sir/Madam,

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application No: Y/80/25/S73
Site Address: Land West of Bilsham Road Yapton BN18 0LA
Description of works: Variation of conditions 2, 14, 15, 22 and 23 imposed under Y/52/23/PL relating to approved plans condition, proposed boundary treatments, proposed cycle storage, proposed ecological mitigation/enhancement measures and proposed energy/sustainability measures.

Thank you for your internet representation made on 5th January 2026 which has been recorded as an objection with the comments as follows:

OWPC80524

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

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. The website is updated once a day in the evening so it may take up to 24 hours for it appear on there. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to planning@arun.gov.uk and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at :<https://www.arun.gov.uk/what-happens-next>.

Some applications will be determined by the Planning Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/planning-application-search>

Any comments that are received after the agenda has been finalised will be separately reported to the members of the Planning Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



Neil Crowther
Group Head of Planning

For details of how the Council will deal with your data please refer to our privacy notices on the website
<https://www.arun.gov.uk/privacy-policy/>

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.

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