



D&M PLANNING ^{Ltd}

Chartered Town Planners

1A High Street, Godalming Surrey GU7 1AZ

www.dm-planning.co.uk

PLANNING STATEMENT INCORPORATING FLOOD RISK ASSESSMENT AND FIRE SAFETY STATEMENT

FULL PLANNING PERMISSION FOR THE ERECTION OF 19 DWELLINGS

BROADLEES, DAPPERS LANE, ANGMERING, BN16 4EN

D&M REF: 120/24/CF

MARCH 2026

DIRECTOR - ANDREW BANDOSZ BA (Hons) MSc Dip UPI MRTPI

SENIOR ASSOCIATE - MATT SMITH BA (Hons) MA MRTPI **ASSOCIATE** - CHRIS FRENCH BSc (Hons) MSc MRTPI

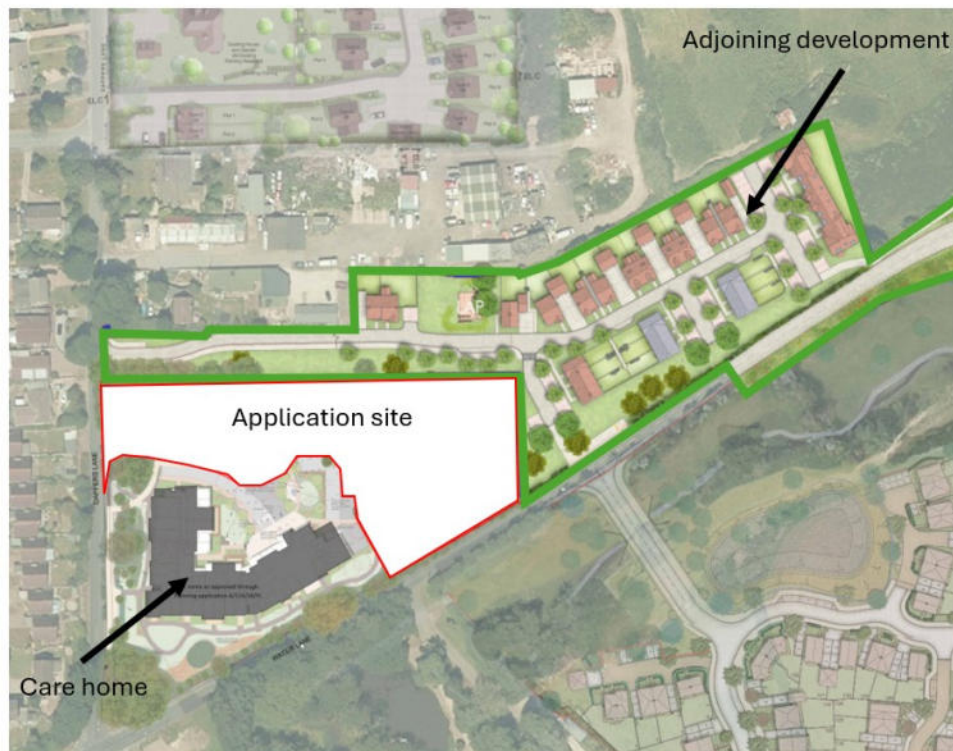
PLANNER - PAUL HARDWICK BSc (Hons) MRTPI

CONTENTS:

1. Introduction
2. EIA Statement
3. Site and Context
4. Planning History
5. Proposal
6. Differences between current application and withdrawn application A/1261/23/RES
7. Planning Policy and Guidance Background
8. Planning Considerations
9. Flood Risk Assessment
10. Fire Safety Statement
11. Conclusion

1.0 INTRODUCTION

- 1.1 D&M Planning Ltd has been instructed on behalf our client, the applicant, to submit this full planning application for the erection of 19 residential units.
- 1.2 This application was originally submitted as a reserved matters pursuant to application A/153/22/OUT, however as the Council have refused to allow a further reserved matters to be determined the applicant has sought to positively resolve this through the submission of a new full planning application.
- 1.3 The submission follows pre application meetings with the Council and positively addresses the matters raised in the refusal of application Ref A/133/24/RES and subsequent appeal dismissal. The Planning Inspector dismissed the appeal under Ref A/133/24/RES on the grounds of the quantity of open space and what was considered a cramped form of development that had a degree of car domination.
- 1.4 The applicants have considered the comments made by the Inspector and worked with the Council sharing a range of options for overcoming the concern. Following a meeting with the Council on 2nd July 2025 a range of layouts were presented, and agreement was reached that the current proposal was the best option for the site. It should be noted that the revised proposals now seek a 19-unit scheme which has opened up more open space and reduced the pressure for parking provision. A further meeting was held in advance of this re submission on 3rd March 2026.
- 1.5 The site (as shown on the plan below) consists of 0.6 ha of land which previously benefited from outline permission for up to 20 homes. The site is surrounded by other development sites with land to the northeast forming part of the Cala housing development at Land North of Water Lane (A/40/18/OUT). A 70 bed Care Home consented under A/114/18/PL has now been completed to the south of the site. Access for this site off Dappers Lane is shared with the Care Home.



Application site shown outlined in red

- 1.6 The application site forms part of the Council's 5-year supply, with the trajectory showing that they anticipate the contribution of **20 units** being delivered within the next 3 years. The Council's most up to date supply position was issued in November 2025. The April 2025 supply position shows the Council were not able to demonstrate a full 5-year supply with the supply at **3.23 years**, and that the past delivery has been below the target set in the NPPF. The 'tilted balance' set out in paragraph 11d of the NPPF is therefore engaged. We maintain that there is no harm from the proposal, however any harms in the 'tilted balance' would need to significantly and demonstrably outweigh the benefits to warrant refusal.
- 1.7 This current scheme is the outcome of detailed discussions with the Council and has fully addressed the matters that were previously reasons for refusal. On this basis we are confident that the application can now be supported by the Council.

SCOPE OF SUBMISSION

- 1.8 The Outline permission A/153/22/OUT established principle of development of up to 20 homes, access was also approved, this remains a material consideration. In order to deliver this scheme at speed, it is imperative that a decision is received on this within the statutory timeframe, we are also seeking to ensure that there are no outstanding pre commencement matters and would welcome the Councils positive engagement to help with the delivery of this site.
- 1.9 In order to present a scheme that overcomes the Council's concerns this full permission has been reduced to 19 units, providing a greater amount of open space than was previously considered by the Council. Access was agreed as part of the Outline consent A/153/22/OUT and there have been no material changes in what is proposed in that regard.
- 1.10 This statement should be read in conjunction with the following documents which are submitted for formal approval:
- Application Form (including ownership certificates)
 - Design and Access Statement
 - Site Location Plan
 - Plans and Elevations
 - Landscape Management Plan and Maintenance Plan
 - Ecological Assessment including Biodiversity Net Gain Assessment
 - Arboricultural Impact Assessment
 - Drainage Strategy

STRUCTURE OF PLANNING STATEMENT

- 1.11 The purpose of this statement is to set out the planning justification for the proposed development in further detail and provide an assessment of the proposals against the relevant national and local planning policies and other material considerations.
- 1.12 This statement will also demonstrate how this scheme has positively addressed the refusal and appeal dismissal of application A/133/24/RES.

2.0 ENVIRONMENTAL IMPACT ASSESSMENT STATEMENT

2.1 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 No. 571) Part 2 4(3), the development scheme has been ‘self-screened’ to ascertain whether the proposed development comprises a project subject to EIA Regulations 2017.

2.2 The proposed development does not comprise of development within Schedule 1 of the EIA Regulations 2017. The development could be considered to comprise of development contained within Schedule 2 Column 1 10B development contained namely Infrastructure Projects and “Urban Development Projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas”. However, the development does not meet the applicable thresholds and criteria within Column 2 of Schedule 2 as amended within The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 No. 571):

(i) The development includes more than 1 hectare of urban development which is not dwelling house development; or

(ii) The development includes more than 150 dwellings; or

(iii) The overall area of the development exceeds 5 hectares.

2.3 The application would represent a small-scale major development of 19 homes. The proposal would therefore fall well below the above thresholds. The proposal is considered not to result in a significant effect upon the environment and does not meet criteria contained within Schedule 3 of the EIA Regulations 2017 or result in a variation/amendment to a previous EIA development nor taken in conjunction with other development is it likely to have a significant environmental effect.

2.4 On this basis, the proposal would not represent EIA development in accordance with the Regulations 2017. The original outline consent was also not treated as EIA development and there has been no material change in circumstances.

3.0 SITE AND CONTEXT

- 3.1 The application site is located on land that formerly comprised of a two-storey detached dwelling named Broadlees along with an area of scrub land associated the dwelling. The site is bound by Water Lane to the south and Dappers Lane to the west.
- 3.2 Notably the site now forms the only undeveloped parcel of land surrounded by other development sites that have been completed. New dwellings that have been constructed on land to the north have been set off the boundary with the application site ensuring an appropriate buffer.
- 3.3 The site is located approximately 500 metres east of Angmering Village which benefits from a range of services, public houses, cafes and some shops. A footpath is located just outside of the site on Water Lane runs into the Village Centre.



Source: Google maps

- 3.4 The photograph below shows the shared access with the Care Home that was completed in accordance with the approved details.



Completed access

- 3.5 The site is therefore surrounded by residential development, and the proposal represents a conforming land use.

4.0 PLANNING HISTORY

4.1 The table below shows the most relevant planning history for the site:

Reference	Description	Decision
A/147/25/RES	Approval of reserved matters following outline consent A/153/22/OUT for the erection of 19 No dwellings (resubmission following A /133/24/RES). This application is in CIL Zone 2 and is CIL Liable as new dwellings.	Undecided
A/133/24/RES	Approval of reserved matters following outline consent A/153/22/OUT for up to 20 dwellings.	Refused Appeal Dismissed 27/05/2025
A/261/23/RES	Approval of reserved matters following outline consent A/153/22/OUT for up to 20 dwellings. This application is in CIL Zone 2 and is CIL Liable as new dwellings.	Withdrawn 15/04/2024
A/153/22/OUT	Outline application for development of the site to provide up to 20 dwellings with all matters reserved (except for access).	Approved 07/03/2023
A/129/19/CLP	Lawful development certificate for the proposed development at Broadlees, Dappers Lane, Angmering as shown on drawing reference number 1877-HIA-ZZ-XXDR-A-01002 Rev P5 comprising buildings 1 - 3 as authorised by permission A/27/16/PL (dated 7th February 2017) and the care home authorised by permission	Refused 20/11/19

	A/114/18/PL (dated 28th May 2019 as a replacement for building 4 authorised by permission A/27/16/PL.	
A/114/18/PL	Demolition & erection of 70 bed care home within Use Class C2 (replacing building 4 approved by A/27/16/PL), access, parking, landscaping and other associated works	Approved 28/05/19
A/151/18/CLE	Application for a lawful development certificate following grant of planning permission A/27/16/PL for an existing development - confirmation that permission has been lawfully commenced	Approve 15/02/19

Adjoining land

A/256/21/RES	Approval of reserved matters following outline consent A/248/21/PL for the erection of 525 No residential dwellings with associated parking, landscape, play areas & public open space	Approved
A/40/18/OUT	Outline application with some matters reserved for the development of up to 525 residential dwellings (Class C3), 3 ha (gross) of employment land (Class B1), public open space, play areas, access, associated infrastructure and landscaping)	Approved

- 4.2 This application therefore follows the grant of outline consent A/153/22/OUT and addresses the matters raised under the withdrawn reserved matters application A/261/23/RES. The submission is identical to the reserved matters that remains undecided under reference A/147/25/RES but is provided in the form of a full application and includes updated ecology information including a BNG assessment.
- 4.3 A comparison between the refused reserved matters scheme and the current proposal is also set out below addressing the comments of the Council and Inspector.

5.0 PROPOSAL

- 5.1 This application seeks Full Planning Permission for 19 units. The dwellings proposed remain of a traditional form and design and would be in keeping with the character of the area. The Layout ensures that 19 units would be provided in a cul-de-sac layout that corresponds to the surrounding developments. With the proposed layout a direct response to the comments of the Planning Inspector and the Council on the earlier application A/261/23/RES:



Site layout A/261/23/RES



Current proposed layout

- 5.2 A section 106 agreement would need to be secured prior to determination, based on the previous 20 unit scheme 6 affordable units were secured. Under the 19 unit proposal,

30% would equate to 5.7 units, therefore 5 units are proposed with a contribution for the 0.7 of a unit. The proposed mix is as set out below:

- 3 affordable rent – 2 x 1 bed flats (plots 1 & 4), 1 x 2 bed house (plot 15)
- 2 intermediate – 1 x 2 bed house (plots 14), and 1 x 3 bed house (plot 13)

6.0 DIFFERENCES BETWEEN CURRENT APPLICATION AND APPLICATION A/133/24/RES

6.1 Application A/133/24/RES was refused for the following reasons:

- 1 *The development of 20 dwellings is unacceptable in that insufficient provision is made in the layout for open space for the number of dwellings proposed, resulting in a cramped form of development and harm to the amenities of future occupiers. Significant harm is identified to the character of the area and quality of the environment and the proposal conflicts with policies OSR DM1, D DM1 and QE SP1 of the Arun Local Plan, and policies HD5 and HD6 of the Angmering Neighbourhood Plan and the relevant section of the Arun Design Guide.*
2. *The development of 20 dwellings would result in a poorly designed scheme, which does not demonstrate high quality design. The hard landscaping provided for the parking of cars on entry to site is excessive and has created a car dominated environment, which results in a cramped and unattractive layout with inappropriate landscaping. The parking layout has not considered the needs of persons with disabilities, which in turn would be expected to increase the amount of hardstanding further. The development is in conflict with policies D DM1, QE SP1, and T SP1 of the Arun Local Plan, TM2, HD5 and HD6 of the Angmering Neighbourhood Plan, Part I of the Arun Design Guide, and the NPPF*

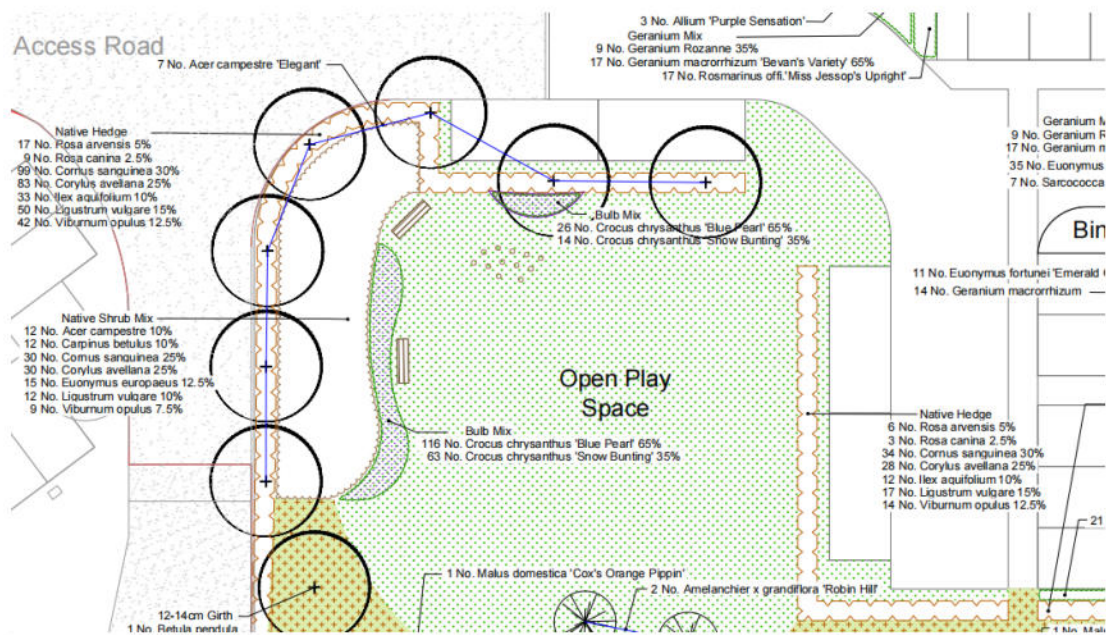
6.2 Application A/133/24/RES was considered acceptable on all other grounds therefore this part of the statement focuses on the changes made to address the refusal reasons.

Reason 1: Insufficient open space and cramped form of layout

6.3 The removal of one unit (reducing the scheme to 19 units) and changing the type of housing by replacing the detached units with semi-detached and terrace properties has freed up space within the development, as can be seen from the plan below:



- 6.4 Not only is the quantum of open space now fully aligned with policy OSR DM1, with a total of 1,705 square metres now provided (approximately 1,000 square metres more than the previous submission), furthermore the open space is positioned at key vistas within the site, including close to the entrance, and is well integrated into the development, enhancing the contribution of soft landscaping. Additional landscaping has been provided to ensure that the 10% Biodiversity Net Gain is delivered on site.
- 6.5 The application is accompanied by a hard and soft landscaping scheme that demonstrates how the planting and hard landscaping maximises the opportunity for a high-quality public realm. As can be seen from the plan below, a native hedge would be positioned along the boundary of the open space and all garden boundaries that face the public realm would be finished with brick rather than closed board fencing.

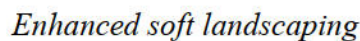


Planting around the public open space



High quality hard landscaping

6.6 In terms of visual improvements, it should also be noted that the car park has now been set further back into the site and spaces that were previously accumulated along the spine road have now been removed from the scheme, this was one of the major concerns raised by the Council. The revised scheme has provided more opportunity for soft landscaping and tree planting.



Reason 2 dominance of parking and lack of space for disabled parking

18



- 6.9 There is significant overlap between reasons 1 and 2, in terms of character impacts as will be set out below the changes made to the scheme address both reasons from a visual and amenity perspective.

7.0 PLANNING POLICY AND GUIDANCE BACKGROUND

- 7.1 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 38(3) states that the Development Plan includes the Regional Spatial Strategy and any other Development Plan documents.
- 7.2 The approved Development Plan for this site comprises the Arun District Council Local Plan 2018 and the Angmering Neighbourhood Plan 2015. An update to the Neighbourhood Plan has been put on hold pending the outcome of the Local Plan.
- 7.3 The site is subject to the following planning constraints/opportunities:
- Within the Built-up Area Boundary
 - Subject to outline consent A/153/22/OUT
 - TPO/A/1/14 and TPO/A/16

Central Government Planning Policy Guidance

- 7.4 The National Planning Policy Framework (NPPF) was first introduced in March 2012. The NPPF has recently been updated with the latest revised version being published in December 2024. National Planning Practice Guidance can also be found in the (PPG) first published in 2016. The National Design Guide (NDG) 2021 is also a material consideration.
- 7.5 There continues to be a strong presumption in favour of sustainable development and at paragraph 3 it advises the Framework should be read as a whole. Paragraph 7 states the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually

supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). However, paragraph 9 states these are not criteria against which every decision can or should be judged. Decisions should also take local circumstances into account, to reflect the character, needs and opportunities of each area.

7.6 Paragraph 12 states the following:

‘The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan...permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.’

7.7 The most relevant sections of the NPPF in relation to this proposal are 2 (Achieving sustainable development); 4 (Decision-making); 5 (Delivering a sufficient supply of homes); 8 (Promoting healthy and safe communities); 9 (Promoting Sustainable Transport); 11 (Making effective use of land); 12 (Achieving well-designed places) and 14 (Meeting the Challenge of Climate Change and Flooding).

7.8 Chapter 2 deals with how sustainable development can be achieved based on economic, social and environmental objectives. Crucially paragraph 11 identifies that for decision making that:

‘Plans and decisions should apply a presumption in favour of sustainable development...

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date⁸, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed⁷; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination.*

7.9 There are two footnotes of importance as part of this, being footnotes 7 and 8.

7.10 Footnote 7 lists areas of importance, which if they provide a strong reason for refusal would disengage the tilted balance. None of these are relevant to this proposal.

7.11 Footnote 8 relates to when a plan can be considered out of date which explicitly states: *"This includes, for applications involving the provision of housing, situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years."*

7.12 as set out in the following section it is our contention that based on the absence of a five-year housing land supply, and the delivery falling below the threshold in the NPPF, the tilted balance as set out in paragraph 11d) is applicable to the determination of this scheme.

- 7.13 Chapter 5 deals with the Government's objective of significantly boosting the supply of homes. It requires Council's to establish and deliver housing for various needs including size, and tenure of properties. Paragraphs 75 through to 81 set out the requirements for Council's to maintain a five-year housing land supply. It is understood that the last published position of the Council was for one equivalent to **3.23** years, which has dropped significantly from this time last year.
- 7.14 The NPPF advises that decisions should be responsive to local circumstances and support housing that reflects local needs. The scheme responds to the prevailing character particularly set against the development of the adjoining land. The proposed housing mix responds to the local need.
- 7.15 Chapter 9 deals with the impact of development on the transport infrastructure encouraging development to make opportunities to reduce the need to travel by car and to ensure that they do not prejudice the safety of the highway network. The junction with Dappers Lane and most of the internal access road have already been delivered as part of the consent for the adjoining care home, along with the Section 278 works to provide a footpath link connecting the access road to the main footpath network on Water Lane.
- 7.16 Chapter 12 deals with the requirement for high quality and beautiful design, which it notes is a key aspect of sustainable development. The proposed development has been carefully considered to respect the context of the immediate setting. The surrounding area consists of a varied mix of architectural design and detailing. Whilst the development may increase the density of housing on the plot it does so in a manner sensitive to its location and surrounding built form.

Local Development Plan

- 7.17 The main planning policy document background comprises the National Planning Policy Framework issued in 2021 (revised since the original Framework in 2012), Arun Local Plan 2011-2031 (2018) and the Angmering Neighbourhood Plan (2015).

Arun Local Plan (2018)

7.18 The relevant local plan policies are considered to be:

- AH SP2: Affordable Housing
- DDM1: Aspects of form and design quality
- OSR DM1: Open space, sport and recreation
- DDM2: Internal space standards
- DSP1: Design
- ECCSP2: Energy and climate change
- ENVDM4: Protection of trees
- ENVDM5: Development and biodiversity
- DM1: Housing mix
- INF SP1: Infrastructure provision and implementation
- LANDM1: Protection of landscape character
- QESP1: Quality of the Environment
- TSP1: Transport and Development
- WDM1: Water supply and quality
- WDM2 Flood Risk
- WDM3 Sustainable Urban Drainage Systems

7.19 The following policies of the Angmering Neighbourhood Plan are considered to be applicable:

- HD3: Housing Mix Angmering
- HD4: Materials
- HD5: Built Form
- HD6: Housing Layout & Design
- HD7: Housing Density
- HD8: Parking for New Developments

7.20 The following documents are also of relevance to this application:

- The Arun District Council Public Open Space, Playing Pitches and Built Facilities January 2020 SPD
- The Arun District Design Guide SPD 2024
- The Arun District Council Parking Standards January 2020 SPD

8.0 PLANNING CONSIDERATIONS

8.1 The main issues are considered to be as follows:

- Principle
- Housing Land Supply
- Making an Effective Use of Land
- Housing Mix
- Nationally Described Space Standards
- Reserved Matter: Layout (including parking, amenities and open space provision)
- Reserved Matter: Scale
- Reserved Matter: Appearance
- Reserved Matter: Landscaping (Including tree impacts)
- Other Matters (Conditions, Biodiversity, SuDS and compatibility with the outline permission)

Principle and Location of Development

8.2 It is a material consideration that the principle of achieving a comprehensive residential scheme for 20 units was established under outline consent A/153/22/OUT. This site sits within the built-up area boundary within the Arun Local Plan 2018, and therefore the principle of housing is acceptable in principle.

Housing Land Supply and Delivery

8.3 Paragraphs 75 to 81 of the NPPF set out the requirement for Local Planning Authorities to identify and maintain a five-year housing land supply. Paragraph 11 sets out that if the Council is unable to provide sufficient housing land supply the relevant policies should be determined out-of-date (subject to the relevant footnotes and paragraph 14), and a tilted balance in favour of development should be applied. It was clarified at

appeal that the tilted balance applies equally to reserved matters as it would do an outline consent.

- 8.4 The latest 5 year supply position issued by the Council shows that they can only demonstrate **3.23 years'** worth of supply, significantly below the 5-year requirement.
- 8.5 Accordingly, the basket of policies in relation to housing must be considered out of date and paragraph 11 (and notably 11d) of the NPPF applies.
- 8.6 Meanwhile, footnote 7 lists areas of importance, which if they provide a clear reason for refusal would disengage the tilted balance. None of these are relevant to this proposal.
- 8.7 The relevant policies in the plan are out of date and therefore permission should be granted unless the adverse impacts of doing so **'significantly and demonstrably outweigh the benefits'**.
- 8.8 Regard must, of course, also be given to paragraph 14 of the NPPF. Paragraph 14 states that:

In situations where the presumption at (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and*
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirements*

- 8.9 The Angmering Neighbourhood Plan is more than 5 years old and therefore paragraph 14 does not apply.

- 8.10 As will be set out in this statement the proposal does not result in any adverse impacts, and therefore permission should be granted. Therefore, this scheme is not reliant on the tilted balance.

Making an Effective Use of Land

- 8.11 Paragraph 125 d) of the NPPF states that:

‘...planning policies and decisions should: promote and support the development of under-utilised land and buildings especially if this would help to meet identified needs for housing...’

- 8.12 As set out the Council is not meeting its identified housing need, and more so it is not meeting its identified affordable housing need. Accordingly, engagement with this paragraph is made as it would *help to meet identified needs for housing*.

- 8.13 The NPPF continues to state at paragraph 130 that:

‘Where there is an existing or anticipate shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.’

- 8.14 It is our contention therefore that the development makes an effective use of the land whilst respecting the character of the area.

Housing Mix

- 8.15 Policy H DM1 of the Arun Local Plan 2011-2031 seeks a mix of dwelling types and sizes based on the most up to date recommendations contained in the SHMA. The SHMA 2016 remains the most up to date. And suggests the following need:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Intermediate/Starter Homes	15-20%	50-55%	25-30%	0-5%
Affordable Rented	35-40%	35-40%	15-20%	5-10%

8.16 The is 19-unit scheme would provide a policy compliant amount of affordable housing as set out below:

- 3 affordable rent – 2 x 1 bed flats (plots 1 & 4), 1 x 2 bed house (plot 15)
- 2 intermediate – 1 x 2 bed house (plots 14), and 1 x 3 bed house (plot 13)
- Financial contribution equivalent to 0.7 of a unit

8.17 The distribution of the affordable units secured via the 106 agreement is shown under the layout considerations (see paragraphs 8.36 to 8.37 below)

8.18 The mix of remaining units is shown below:

1 bed	2 bed	3 bed	4 bed
0 0%	4 28%	8 57%	28 %

8.19 The mix shows a good level of consistency with the SHMA without following it rigidly, with the market mix weighed towards 2- and 3-bedroom dwellings. It should be noted that since the SHMA 2016 the shift to home working has led to the pressure for a higher number of bedrooms with more demand experience for 3-bedroom properties.

8.20 It should be noted that it remains a material consideration that no concerns were previously raised with a similar mix on the site.

Nationally Described Space Standards

8.21 Local Plan Policy D DM2 (Internal space standards) states: “*The planning authority will require internal spaces to be an appropriate size (having regard to the*

exceptions that may apply as referred to in paragraph 13.3.4) to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance.”

8.22 Paragraph 13.3.4 goes on to refer to guidance within the Council’s Design Guide. Design Guide Section J.08 (Internal Space Standards) provides additional helpful guidance in relation to internal space requirements. Notably J.08 references the benefits of meeting building regulations standards M4 standards. We can also confirm that 30% of the units will be provided to M4(2) standards (plots 1, 2, 7, 9, 10 and 12). The distribution of M4 (2) units is shown on the accommodation schedule.

8.23 The table below shows the floor space of the units proposed against the Nationally Described Space Standards:

Table 2:

Plot	Dwelling Type	Internal Space	Nationally Described Space Standard	Compliance
1	1 bed flat (M4(2))	50sqm	50sqm	Yes
2	2 bed flat (M4(2))	63sqm	61sqm	Yes
3	2 bed flat	63sqm	61sqm	Yes
4	1 bed flat	50sqm	50sqm	Yes
5	2 bed flat	63sqm	61sqm	Yes
6	2 bed flat	63sqm	61sqm	Yes
7	3 bed house (M4(2))	94sqm	84sqm	Yes
8	3 bed house	94sqm	84sqm	Yes
9	3 bed house (M4(2))	94sqm	84sqm	Yes
10	3 bed house (M4(2))	101sqm	95sqm	Yes

11	3 bed house	101sqm	95sqm	Yes
12	3 bed house (M4(2))	101sqm	95sqm	Yes
13	3 bed house	95sqm	95sqm	Yes
14	2 bed house	81sqm	70sqm	Yes
15	2 bed house	81sqm	70sqm	Yes
16	3 bed house	101sqm	95sqm	Yes
17	3 bed house	101sqm	95sqm	Yes
18	4 bed house	131sqm	121sqm	Yes
19	4 bed house	131sqm	121sqm	Yes

- 8.24 The floor plans demonstrate that the bedrooms and storage space requirements would also be met.

Layout and Character

- 8.25 The current layout follows detailed discussions with the Council and helpful feedback, confirming that this application is the Council's preferred option. Case officer comments are as below:

*'we agree with your assessment and concur that **Option 6** appears to offer the most balanced and positive solution. In particular, we welcome the following elements:*

- The **parking court serving the flats is screened from initial views**, helping to create a more attractive and welcoming entrance to the site.*
- The **maintenance of the front building line and the verdant frontage** are both strong features that contribute positively to the character of the development.*

- *As one moves through the site, the **central open green space** is visually dominant, accessible, and well-overlooked. This layout avoids the creation of hidden or poorly surveilled areas, reducing the potential for anti-social behaviour.’’*

8.26 Local Plan Policies D DM1 and SP1 set out the general design principles for development.

8.27 Policy D SP1 (Design) is provided in full below:

*‘‘All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their **layout**, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development. With major developments (as defined in the GDPO 1995 (as amended(41)) or allocated sites in the Development Plan. In addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required.’’*

8.28 Policy D DM1 (Aspects of form and design quality) covers a board range of matters, particularly in relation to layout it states that the Council will have regard to the following *‘‘...Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.’’* Policy D DM1 also covers the need to ensure development provides save environments through natural surveillance, is legible and protects amenities.

8.29 The Arun District Design Guide 2024 provides design guidance that relates to layout, including section G relating to Built Structure & Development Plots and H on designing

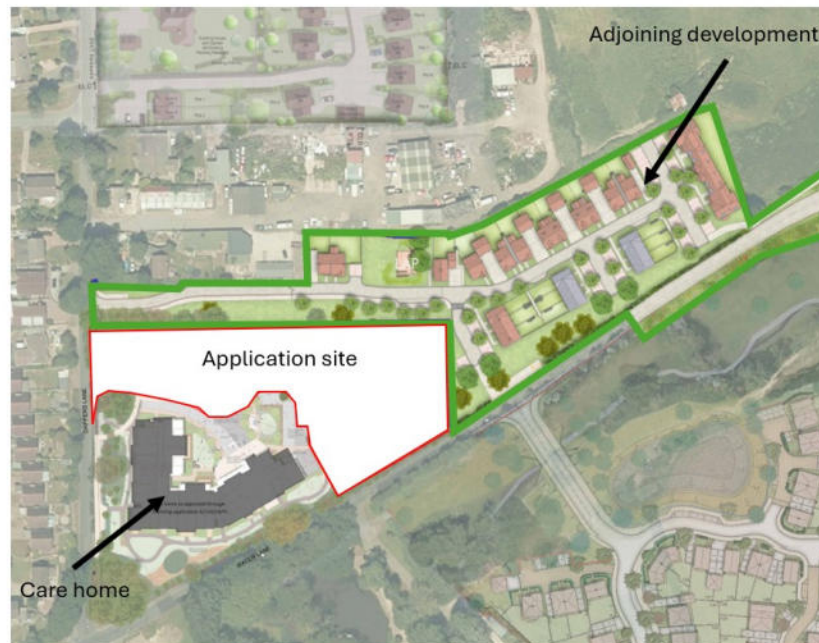
Welcoming Streets & Places. The design guidelines have been considered and incorporated into the development to create a well-designed sense of place.

8.30 The site layout plan is as set out below:



8.31 The layout comprises of a single spine road with two small cul-de-sac areas. This is the arrangement that responds best to the shape of the site and allows the open space to be the focal point of the development.

8.32 The proposed layout for this application fits neatly with that found on the neighbouring development whilst still retaining space around the care home building to the south. In term of legibility the layout is characteristic of that found in the surrounding and responds positively to the prevailing character.



- 8.33 The layout provides for a mixture of semi-detached houses, terrace properties and flats that appear as a terrace, therefore providing a variety across the site. The unit types are mixed across the layout so that the development would read cohesively as one.
- 8.34 Guidance contained in the Arun Design Guide 2024 (Part H 01) encourages the use of privacy strips providing a defensible zone in the form of front gardens. The guidance encourages a 2-metre strip so that footpaths do not run directly past front windows. Such privacy strips also provide visual relief benefiting the character of the development.
- 8.35 The layout positively addresses the need to provide defensible areas to the front of all units. These are highlighted on the plan below in blue:



Plan showing privacy strips in blue

Layout: Affordable Housing Secured Via 106 Agreement

- 8.36 The S106 agreement will secure a mixture of affordable housing compliant with the Council's requirements set out in Policy AH SP2 of the Local Plan. Policy AH SP2 seeks to permit affordable housing units in small clusters. The layout of this application has ensured that the units to be secured via the 106 agreement are mixed across the site, please see the plan below:



- 8.37 The proposal ensures that the affordable units to be secured via the 106 agreement are appropriately distributed around the site.

Layout: Parking

- 8.38 Arun District Council Parking Standards 2020, identify this site as being within parking behaviour zone 2 and therefore for a development of the mix provided requires a total of 44 spaces (this figure includes the 20% visitor space requirement).
- 8.39 Arun District Design Guide SPD 2024 I.01 provides guidance on car parking strategies and states that *‘car parking should be provided through a variety of solutions’* recognising that *‘on-street parking is often the most efficient use of space and land.’*
- 8.40 The layout provides 44 spaces and therefore provides sufficient parking to meet the guidelines. During the previous reserved application concerns were received relating to the parking dominating the development. Through discussions with the Council on this matter it has been agreed that the current scheme addresses those concerns. As can be seen from the plan below, the prominence of the courtyard parking is now significantly reduced, and parking has been removed from the spine road.



- 8.41 A variety of design solutions are proposed to ensure that parking is appropriately distributed without dominating the development. With the parking layout now fully addressing reason for refusal 2 of application A/133/24/RES.
- 8.42 As demonstrated above the proposal makes the best available use of a range of parking strategies to ensure that the layout is not dominated by parking. The proposal would comply with the requirement of the Arun District Council Parking Standards 2020 and Design Policy D DM1.

Layout: Bike and Bin Storage and Refuse Collection and Storage

- 8.43 As with the previous submission, within plots a clear and considered strategy for storage of bikes and bins has been provided. The flatted properties have been provided with communal storage areas; dwellings have been provided with easily accessible stores in their rear gardens.



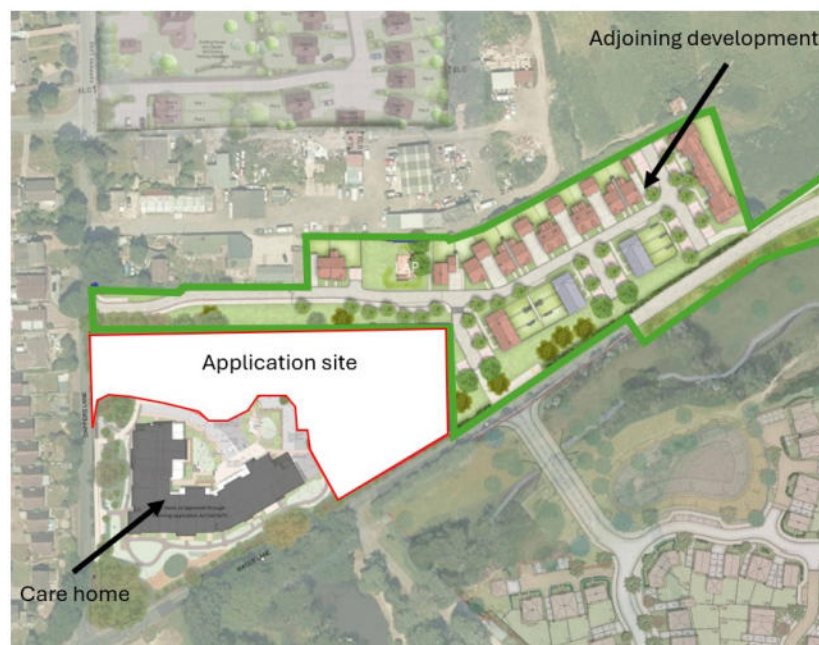
Examples of the bin and bike stores

Layout: Residential amenities

- 8.44 Policy D DM1 states that proposals should ‘ ‘ *Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.*’
- 8.45 Arun District Design Guide SPD 2024 H.04 provides guidelines for assessing impact on residential amenities, both in relation to existing occupiers of neighbouring land and

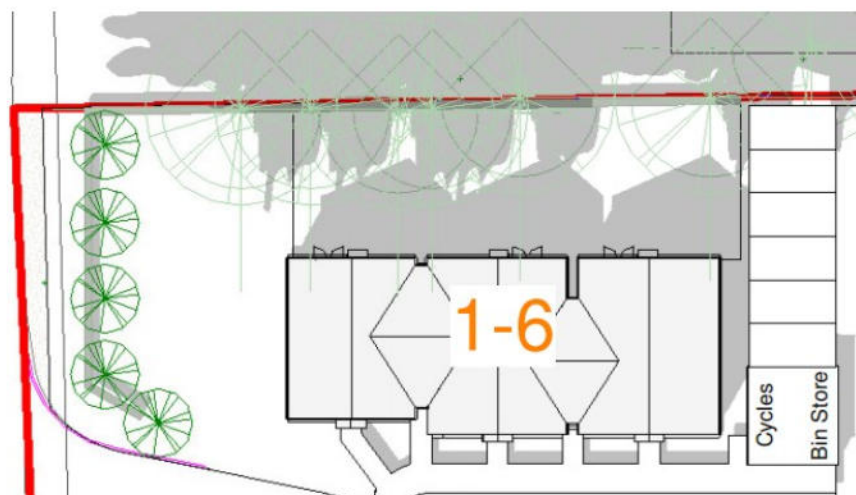
occupants of the new development. These guidelines relate to ensuring that the development is appropriate in terms of light, privacy and overbearing impacts, but also covers external amenity space standards. As a guideline only, the policy suggests the provision of rear garden depths of 10.5 metres and back-to-back garden separation of 21 metres.

- 8.46 As can be seen from the plan below, neighbouring properties in the recently completed development that surrounds the site to the north and east are set off the boundary with their access road between the site and the new houses, ensuring that no overlooking, loss of light or privacy would occur.



- 8.47 It should also be noted that within the development the spine road and open space ensures that sufficient separation would be retained between the development and the care home.
- 8.48 For the reasons described above the proposals would have no adverse impacts on neighbouring development and would comply with Policy D DM1 and guidance contained in the Arun District Design Guide in this regard.

- 8.49 With regards to on-site arrangements these have been carefully considered to ensure that the development itself provides for a high standard of amenity for future occupants.
- 8.50 The layout proposed ensures that there would be no direct overlooking between properties. Furthermore, the position of buildings has been carefully considered to ensure that there are no overbearing impacts or loss of light within the development.
- 8.51 In terms of outdoor space flats 1 - 6 all benefit form attractive outdoor amenity spaces having access to a shared communal area:

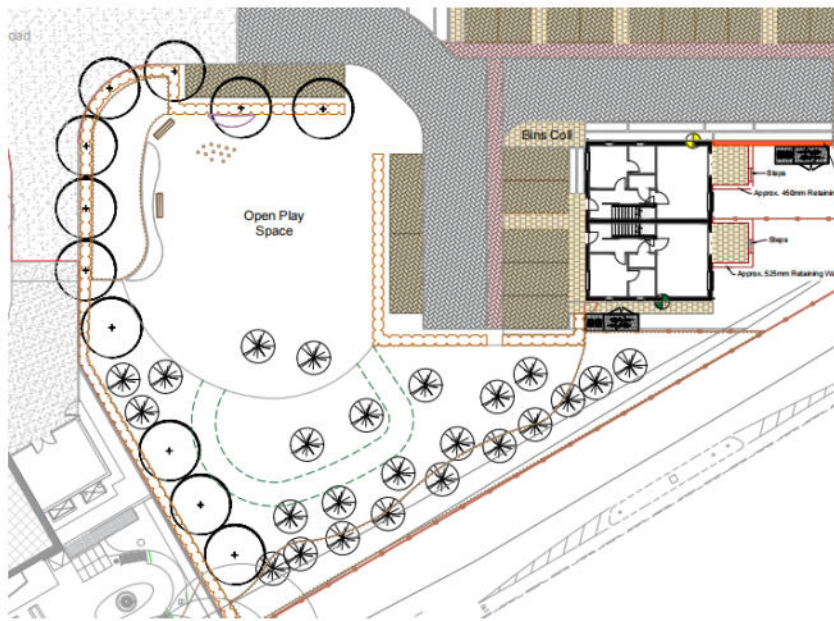


Layout showing amenity space provision for flats

- 8.52 Whilst garden depths for the dwelling houses range across the development they are all substantial in size ranging from 13 metres to 14 metres, all properties would be provided with a high quality of usable outdoor space. Privacy strips have also been incorporated to the front of properties.
- 8.53 The layout provides a high-quality environment in terms of the amenities of existing future occupants and would create an attractive living environment. The proposal complies with Policy D DM1, and guidance contained in the Arun District Design Guide in this regard.

Layout: Open Space and Play Space Provision

- 8.54 Open space and play space formed part of the reason for refusal of application A/133/24/RES. As set out above, in order to avoid a further issue on this matter this revised scheme has been designed with input from the Council and is a scheme that we believe officers support in terms of the open space provision. It should be noted from the outset that this scheme now exceeds the quantitative standards.
- 8.55 Local Plan Policy OSR DM1 (Open Space, Sport and Recreation) sets out that *“for larger developments, the quantity standards should be used to help determine the requirements for open space provision as part of that development”*.
- 8.56 Arun Design Guide 2024 Part H.03 provides guidance on open space setting out high level principles such as ensuring open space is provide with natural surveillance and well connected through the development. The SPD states that *“schemes should be designed to avoid ‘left over’ incidental spaces with no clear purpose”*.
- 8.57 Arun District Council Public Open Space, Playing Pitches and Built Facilities SPD (2020) sets guidelines for the quantity and type of space dependant on the number of units being proposed. Table 4.1.2 sets out that for a 20 unit scheme it is anticipated that public open space be provided on site along with a Local Area of Play (LAP), there is no requirement on site for a LEAP, NEAP or Allotment provision. As set out in the officer report a 20 unit scheme carried a total open space requirement of 1,408 sqm, this scheme with one less unit delivers 1,705 sqm of public open space.
- 8.58 The layout maximises the opportunity to provide play space balanced against providing a scheme that is in keeping with the character of the area. The plan below shows how the open space and play space provision has been enhanced under the current application:



Main area of outdoor space

- 8.59 The above space will incorporate a LAP, with the plans indicating informal play features such as stepping logs and would also allow for a large open space and benches. The amount of open space is more than double that which was previously refused by the Council and fully complies with both the quantity and quality standards set out in OSR DM1.

Scale and Character

- 8.60 Local Plan Policy D DM1 (Aspects of form and design quality), states the following with regards to scale:

"The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement."

- 8.61 The scale of surrounding locality is primarily of low to medium density housing in cul-de-sac formations. The height, bulk and massing of buildings is domestic in scale with the prevailing character being of traditional two storey dwellings. Recent residential

developments that have taken place to the north of the site and south of Water Lane have followed this scale of development.

- 8.62 The proposal is for buildings of a scale that would follow the prevailing character, two storey dwellings are proposed ranging in design, and even the flatted building providing flats 1-6 would be of the same scale as three dwellings, with the links between them recessed. The use of gable features and variations in materials ensure that the buildings are well articulated, and any bulk of the buildings is broken down.



Flats 1 – 6



Plots 7-9

- 8.63 No issues have been raised with regards to scale under the earlier submissions and this application follows similar scale parameters. The proposal would be of a scale that fits comfortably with the site and surroundings.

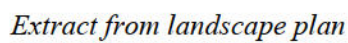
- 8.64 Local Plan Policy D DM1 (Aspects of form and design quality) states that the Council will have regard to appearance requiring development to *“Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.”*
- 8.65 Policy HD5 of the Angmering Neighbourhood Plan seeks to ensure all new development follows the character of the existing built form, creating a positive addition to the current style and mix of the area.
- 8.66 Whilst the scale of built form is fairly uniform in the surrounding area there is a degree of variance with regards to design features. Buildings are of a traditional form, however range in materials and designs features. This application is supported by a Design and Access Statement by TDC Architects which contains full details of materials, we therefore maintain that this can now be conditioned as compliance rather than a pre commencement requirement.
- 8.67 Brickwork, render and tile hanging are all found in the surroundings. Therefore, the application makes use of a variety of materials creating a good sense of place that responds to the surroundings.
- 8.68 Dwellings on this site are well articulated with traditional designs, a variety of gable features, differing roof forms and arrangements of windows ensure that the buildings are of a high-quality design and appearance.

Landscaping (Including tree impacts)

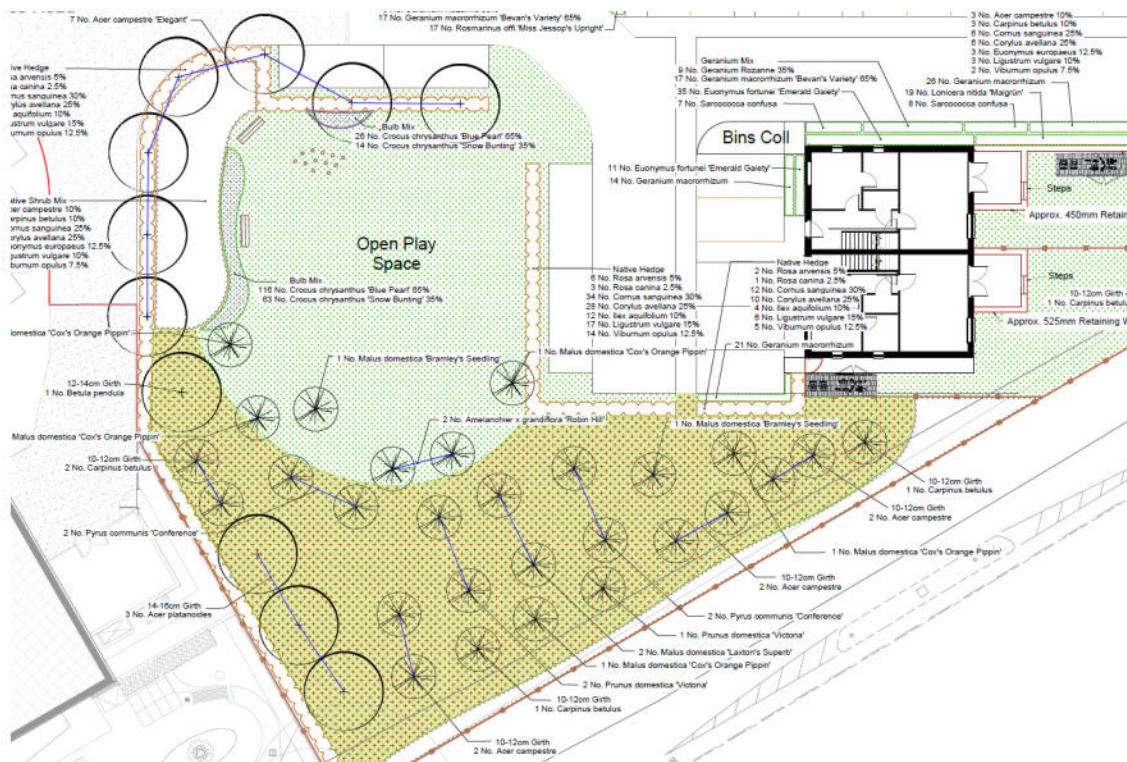
- 8.69 Local Plan Policy D DM1 (Aspects of form and design quality) states that “all new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.
- 8.70 Arun Design Guide 2024 Part E.02 (Landscape Structures & Trees) sets out that *“trees, hedgerows and planting are particularly important landscape features, having benefits*

in terms of ecology and biodiversity, air quality, carbon sequestration, reducing urban heat island effect and providing character to an area.’’

- 8.71 Local Plan Policy ENV DM4 (Protection of Trees) requires development to avoid damage to trees protected by Tree Preservation Orders unless the benefit of the development in a particular location outweigh the loss of the trees. The impact on existing trees has already been considered under outline application A/153/22/OUT and was found to be acceptable. An updated BS:5837 complaint Arboricultural Impact Assessment and Method Statement is submitted under this application. The Statement sets out that whilst there are a few lower value trees within the central part of the site their removal was agreed under A/161/21/DOC (reserved matters submission for the care home). All other trees are to be retained and protected during the development.
- 8.72 A comprehensive landscape strategy has been developed by The Landscape Partnership. A full suite of documents including the Landscape Management & Maintenance Plan along with hard and soft landscape drawings is provided with this submission.
- 8.73 The landscape strategy has been designed to ensure that all opportunities are taken to supplement existing planting and ensure that both hard and soft landscaping is undertaken in a way that softens the impact of development and ensures that the development fits well into the surrounding environment.
- 8.74 Notably the revised scheme has the added benefit of a more robust planting scheme around the open space and at the entrance to the site:



8.75 The Landscaping strategy significantly enhances the Local Area of Play (LAP) and the public open space area. Low parameter hedging acts as a means of enclosure with a new central cluster of trees being planted. Two park benches are shown at the far end of the space and play features will be dispersed around the space.



Local Area of Play and Public Open Space

- 8.76 A consistent and comprehensive landscape strategy is proposed across the whole site and ensures an enhancement of the environment and character of the development. The proposal complies with the objectives of Policy D DM1, and Guidance contained in the Council's Design Guidelines 2024.

BIODIVERSITY

- 8.77 Local Plan Policy ENV DM5 states that development schemes shall seek to achieve a net gain in biodiversity and protect habitats on site. An updated ecological survey accompanied by a Biodiversity Net Gain assessment is submitted with this application as it is a material change in circumstances since the grant of the previous outline consent that the requirements of the Environment Act 2021 came into force.
- 8.78 The proposals also show that buildings will be fitted with a range of bat tubes and swift boxes. A stag beetle loggery is also proposed at the entrance to the site within the landscaped buffer. In addition to this updated ecology report dated March 2026 proposes additional tree planting and ensures that the 10% Net Gain is requirement is exceeded on site, with a 12.62% uplift to be achieved. The proposal complies with Policy ENV DM5 and the requirements of the Environment Act 2021.

DRAINAGE

- 8.79 A high-level principles SuDS scheme was provided within the outline submission conditions placed on the outline consent (condition 15 and 17). A full package of drainage information has been submitted with this application addressing all outstanding drainage matters. We would be grateful if the Council could expediate the review of the drainage details as we have experience significant delay in resolving the matter when previously submitting under these conditions.

HEADS OF TERMS

8.80 As this is a new full planning application, the application would be subject to a new 106 agreement, whilst this would broadly follow the agreement secured for A/153/22/OUT it is worth setting out the broad heads of terms below:

- Securing 5 units of affordable housing as below

3 affordable rent – 2 x 1 bed flats (plots 1 & 4), 1 x 2 bed house (plot 15)

2 intermediate – 1 x 2 bed house (plots 14), and 1 x 3 bed house (plot 13)
- Secure affordable housing contribution equivalent to 0.7 of a unit

OTHER MATTERS

8.81 With regards to contamination condition 10 on the previous outline consent A/153/22/OUT required a remediation strategy and verification report to be agreed prior to occupation. It is anticipated that similar conditions would be imposed on approval of the full consent.

8.82 The scheme would still achieve the affordable housing requirement in line with that previously agreed in the 106 agreement for the outline consent.

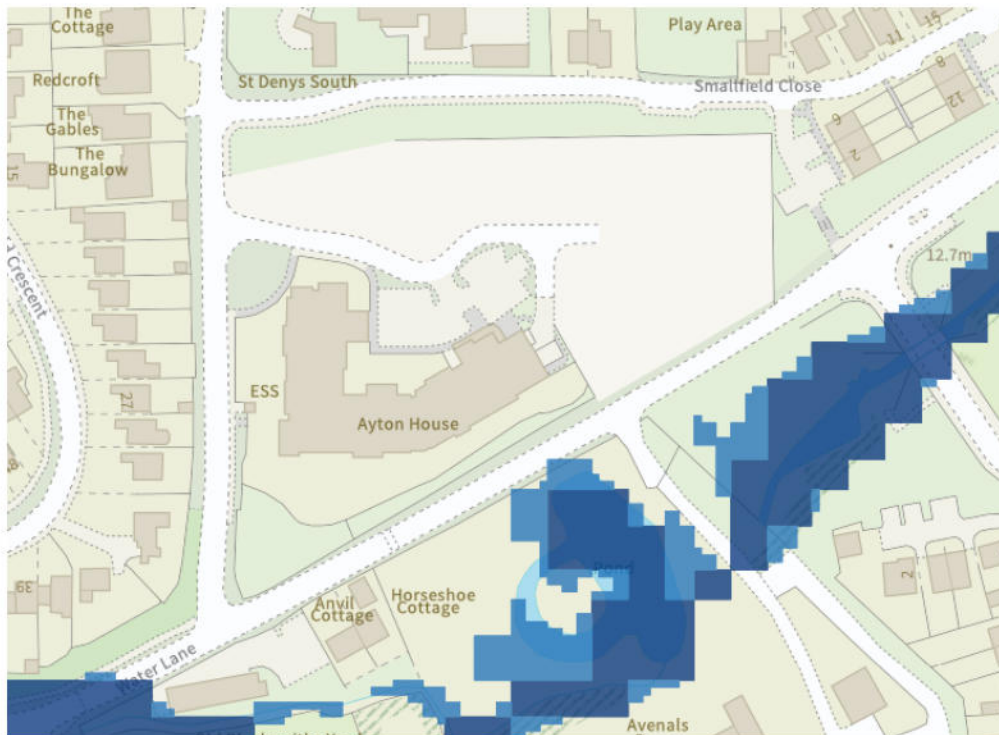
8.83 We had previously discharged conditions 4 (materials), 6 (visibility splays), 13 (construction management plan), 18 (Tree Protection), 24 (Water Hydrant), 25 (employment and skills plan). As the layout has been adjusted and we are seeking a new full consent for completeness, we are seeking agreement of these details upfront to speed up delivery.

8.84 A full materials schedule, detailed drawings of the visibility splays, construction management plan, drainage strategy, tree protection plan and hydrant location plan have been submitted with this application. Much of this detail was agreed in relation to

the earlier reserved matters submission of the same layout and design, however for completeness and to avoid the need for further pre commencement conditions we have provided a complete package of information.

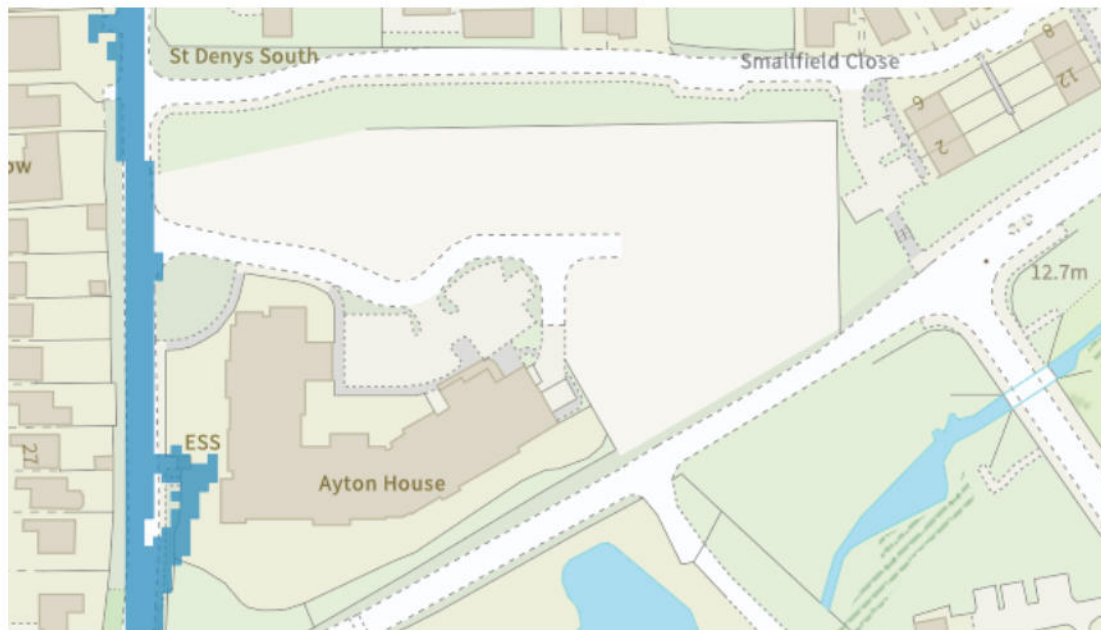
9.0 FLOOD RISK ASSESSMENT

- 9.1 The application is supported by a detailed drainage strategy by Arc Engineers updated in October 2025. This site is under 1ha in site area and located outside of flood zones 2 and 3 and is therefore at low risk of flooding (see mapping below).



Flood Zones 2 and 3 (source EA Mapping)

- 9.2 Surface water flooding is shown along Dappers Lane; however, it does not come into the site itself.



Surface water flood map (Source: EA Mapping)

- 9.3 This matter is covered within the Drainage Design Strategy submitted with this application. No change in flood risk has taken place since the 2022 outline submission, which was considered acceptable on flood risk grounds.
- 9.4 Detailed drainage strategies were submitted under the discharge of conditions for application A/153/22/OUT, with the only outstanding a few outstanding matters of detail that were waiting to be agreed. For ease of reference, we have submitted the previous drainage conditions tracker, and corresponding engineers technical note, along with the detailed drainage strategy containing the updates to address the final comments. For the reasons described above and within the Drainage Strategy the development would not be at risk of flooding.

10.0 FIRE SAFETY STATEMENT

- 10.1 Government guidance confirms that the level of detail and focus of information should not contain the breadth and depth of information on fire safety which will be submitted at building control application stage. Rather fire statements will support the consideration of information on fire safety issues relevant to land use planning matters e.g. where fire safety issues relate to site layout and access.
- 10.2 In this instance all buildings would be under the 18-metre height and therefore would not be subject to the additional requirements of the Building Safety Act 2022.
- 10.3 The servicing plan shows that the layout is arranged in a way that would allow all vehicles including fire tenders access to all properties (Please see servicing plan AL(9)902 P2):



- 10.4 Under the earlier outline consent, and subsequent reserved matters no concerns were raised on fire safety grounds. However, a condition was placed on the outline consent requiring details of the fire hydrants to be submitted and approved (condition 24), condition 24 was subsequently agreed, and under this application we have provided the

detail of the hydrant location taking into consideration the revised layout (see drawing AL(9)903 P2), this detail can therefore be agreed as part of the consent:



- 10.5 Relevant considerations have been given to the layout and design with regards to fire safety and further details would be supplied at the building regulations stage.

11.0 CONCLUSIONS

- 11.1 This full submission creates a well-designed and attractive environment for modern living. Fully embracing the principles at the heart of the NPPF, which seeks ‘creation of high quality, beautiful and sustainable buildings and places’.
- 11.2 This scheme has been revised to address the previously dismissed appeal and is the preferred layout following discussions with the Council. We are therefore not anticipating any adverse impacts, as we are confident that this is a scheme that now complies with all elements of the development plan including the quantity requirements of the Council’s open space policy. Notwithstanding that point, should any adverse impacts be identified, they would need to be considered in a ‘tilted balance’.
- 11.3 A timely positive decision is needed in order to aid delivery of this, which is within the Council’s 5-year supply. We would therefore greatly appreciate positive engagement dealing with any outstanding matters with regards to conditions, particularly given the previous delays we have experienced on the drainage conditions.
- 11.4 We therefore respectfully request that permission be granted.
- 11.5 We trust we have provided officers with sufficient information to determine the application, however, should further be required please do not hesitate to ask.

D & M Planning Ltd

Chartered Town Planners