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**From:** Daun Johnson <Daun.Johnson@arun.gov.uk> **On Behalf Of** Planning.Responses  
**Sent:** 29 September 2026 15:33  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Subject:** FW: WA/89/26/NMA – Supplementary representation: approved baseline, garage clarification and cumulative assessment

Please upload email to WA/89/26/DOC, planning, representation

**Daun Johnson**  
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**From:** Amber Willard <Amber.Willard@arun.gov.uk>  
**Sent:** 29 September 2026 13:29  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Subject:** FW: WA/89/26/NMA – Supplementary representation: approved baseline, garage clarification and cumulative assessment

Please upload as rep letter for WA/89/26/NMA

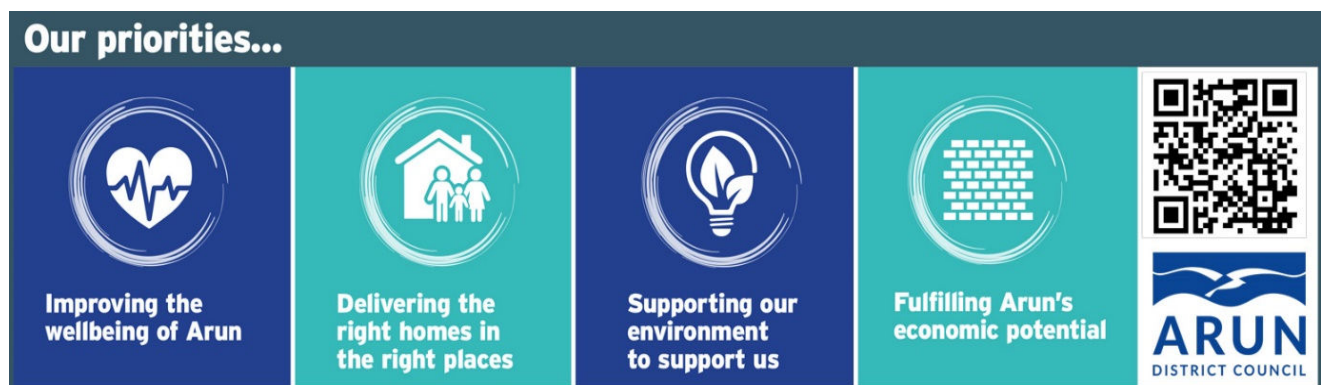
**Amber Willard MRTPI**  
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**From:** Residents of Walberton - RoW [REDACTED]

**Sent:** 29 September 2026 13:21

**To:** Amber Willard <[Amber.Willard@arun.gov.uk](mailto:Amber.Willard@arun.gov.uk)>; Cllr. Mel Penycate <[Cllr.Mel.Penycate@arun.gov.uk](mailto:Cllr.Mel.Penycate@arun.gov.uk)>;  
Cllr. Sue Wallsgrove <[Cllr.Sue.Wallsgrove@arun.gov.uk](mailto:Cllr.Sue.Wallsgrove@arun.gov.uk)>

**Subject:** WA/89/26/NMA – Supplementary representation: approved baseline, garage clarification and cumulative assessment

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Dear Officer Willard,

Further to my objection of 18th September concerning WA/89/26/NMA, I have continued to reconcile the submitted amendment package against the final drawings and documents approved under WA/52/24/RES.

I do not propose to repeat the detailed matters already raised. However, further comparison with the final approved reserved-matters package has identified one numerical point which I wish to correct, and has reinforced my concern regarding the approved baseline and the cumulative assessment required before the NMA is determined.

## **Garage provision – clarification of my earlier representation**

My representation of 18th September referred to at least 17 garage omissions. Having now undertaken a further direct comparison against the final approved hard-landscape drawings, I wish to correct that figure.

The final WA/52/24/RES decision identifies Hard Landscape Proposals Sheets 1–4, drawing ELVS24539 12 Revision B, together with the approved single- and double-garage drawings, as part of the approved reserved-matters scheme.

My comparison of that approved package with the proposed NMA layout identifies **14 garage structures comprising 16 garage bays** which appear to be removed: **11 standalone single garages, one single garage forming part of/attached to a dwelling, and two double garages.**

I would therefore be grateful if the earlier reference to 17 garages, and the associated illustrative calculation based upon that figure, could be treated as superseded by this clarification.

The correction does not alter the underlying issue raised in my objection. Rather, it reinforces the need for a clear plot-by-plot reconciliation identifying precisely which approved garages are being removed, how each was treated within the approved parking calculation, and what replacement parking and cycle-storage provision is now relied upon.

The approved Transport Statement identifies qualifying 3m x 6m garages as contributing 0.5 parking spaces. On a purely illustrative basis, if each of the 16 garage bays now apparently removed attracted that 0.5-space credit, the resulting difference would be 8 credited spaces. I do **not** suggest that this is necessarily the final revised parking figure: that requires verification against the approved garage dimensions, individual plot allocations and any replacement provision.

I therefore request that the applicant provide a reconciled plot-by-plot parking schedule before WA/89/26/NMA is determined.

This appears particularly relevant in light of the Council's recent decision in **A/107/26/NMA, Land North of Water Lane, Angmering**. In that case the Council concluded that the design and amenity effects of converting three carports to garages were not material, but nevertheless refused the NMA because the resulting reduction of 1.5 credited parking spaces had material planning implications requiring Highway Authority assessment. The Council concluded that the amendment could not therefore be dealt with under section 96A.

I appreciate that each NMA is scheme-specific and do not suggest that A/107/26/NMA constitutes a precedent. However, it illustrates why the parking consequences of the present garage omissions should be positively established rather than assumed before materiality is determined.

## **Approved baseline and supersession**

My wider concern remains that WA/89/26/NMA cannot properly be assessed without first identifying the exact final WA/52/24/RES scheme against which the amendments are being compared.

The reserved-matters decision expressly approves the final landscape drawings, including Hard Landscape Proposals Sheets 1–4 Revision B and Soft Landscaping Proposals Sheets 1–4 Revision C.

There were multiple substituted drawings during the reserved-matters process, and some of the material now submitted under WA/89/26/NMA appears difficult to reconcile with that final approved package.

Could the officer assessment therefore please identify:

1. the final WA/52/24/RES drawings and revisions comprising the comparison baseline;
2. which approved drawing is superseded by each proposed NMA drawing;
3. whether consequential approved drawings containing the same buildings, boundaries, parking, landscaping or infrastructure have also been checked and, where necessary, updated; and
4. where a proposed NMA drawing is said already to reflect an approved arrangement, the precise approved drawing number and revision relied upon.

This is not simply a document-management issue. A reliable assessment of whether a change is non-material necessarily requires the approved scheme from which that change is being measured to be identified correctly.

### **Estate railings and post-and-rail fencing**

The boundary-treatment amendment particularly illustrates this point.

The approved RES officer report records that a **1.1m high estate railing fence** was to be provided along the southern elevation specifically so that the boundary would not appear enclosed and would retain views across the adjoining field. The report separately identifies **1.1m post-and-rail fencing behind Plots 17–21 adjoining the Conservation Area**. The two treatments therefore performed distinct roles within the approved landscape design.

WA/89/26/NMA expressly proposes replacing estate railings with post-and-rail fencing, and the proposed site-layout legend now identifies **“TIMBER POST AND RAIL FENCE”** where the approved site-layout legend identified **“ESTATE RAILINGS.”**

The proposed site layout does not itself establish the height, rail arrangement, detailed construction or whether stock mesh, hedging or another associated treatment forms part of that replacement.

That is significant because post-and-rail fencing is not itself a single uniform treatment within the approved landscape documentation. The approved soft-landscape specification, for example, also describes 1.2m rounded post-and-rail fencing with three cross rails and stock fencing for native planting areas.

This appears particularly relevant to the Council's decision in **A/165/23/NMA**, also at Land North of Water Lane. There, the Council was unable to conclude that a fencing amendment was non-material where adequate information regarding height, colour and style had not been supplied, submitted plans conflicted, the superseded plans were not clearly identified and consequential approved hard-landscape details had not been updated.

The decision expressly required any future submission to identify the appearance and location of the proposed fence, the plans being superseded and any other approved plans requiring amendment to ensure consistency.

Again, I recognise that A/165/23/NMA is scheme-specific and not a precedent. However, I would be grateful if the officer assessment of WA/89/26/NMA could identify precisely which approved lengths of estate railing are being replaced, the proposed post-and-rail specification, and the consequential drawings which demonstrate the resulting boundary treatment and its effect upon the openness and views which the approved estate railings were expressly intended to preserve.

A further representation now recorded on the application file also raises a specific local-character and heritage concern regarding the railings.

Christine Cooper states that the railings she understands to be affected are historic, remain in situ and form part of the visual approach towards the Conservation Area. I recognise that a resident representation does not by itself establish their age or heritage significance. However, it does raise an additional factual question which should be resolved before determination: namely, whether the NMA affects any existing historic railing fabric, or only the approved proposed estate-railing treatment shown within the WA/52/24/RES landscape scheme.

If existing historic railings are affected, their significance and contribution to local character should be identified and assessed; if they are not, the Council should make that distinction clear in the officer assessment.

### **Cumulative effect of the amended scheme**

My central objection remains the cumulative one.

WA/89/26/NMA is not confined to garage and boundary changes. The package also contains amendments to dwelling floor areas and house types/elevations, alterations to built form and roofscape, revised landscaping, PV panels and ASHP equipment, and relocation of the pumping station.

I appreciate that individual amendments may potentially be capable of being non-material when considered alone. I also recognise, as stated in my original representation, that the number of replacement drawings does not itself determine materiality.

The relevant question is whether the **resulting development as a whole**, when compared with WA/52/24/RES as finally approved, remains non-material.

I would therefore be grateful if the officer assessment expressly considers the combined effect upon:

- the approved built form and street scene;
- the balance between buildings, garages, gardens and parking;
- boundary treatment and landscape character;
- the approved planting and screening strategy;
- drainage and pumping-station infrastructure;
- servicing and circulation;

- the conservation-area setting; and
- the coordination of the amended buildings with the proposed energy and acoustic measures.

### **Pumping-station relocation**

Please also confirm how the relocation of the pumping station has been assessed within that cumulative exercise.

The approved arrangement provided a distinct infrastructure location and servicing arrangement. The NMA places the station within the surgery parking/circulation area.

I would be grateful if the assessment identifies the proposed chamber and compound arrangement, maintenance-vehicle approach and standing position, any effect upon surgery parking and accessible circulation, and any consequential hardstanding, landscape, noise or boundary changes required to make the relocated station operational.

If those consequential works are required, they should form part of the scheme being assessed for materiality rather than being deferred from the NMA comparison.

### **Relationship with WA/85/26/DOC**

The relationship with WA/85/26/DOC also makes identification of the correct baseline particularly important.

WA/85/26/DOC was submitted seeking full discharge of a number of conditions, while elements of the supporting information have already required reconciliation with the amended design.

If approval of WA/89/26/NMA is intended to establish the amended scheme against which those conditions will subsequently be considered for full discharge, it seems essential that the Council first establishes:

- exactly which amended scheme has been approved;
- that the resulting drawing package is internally consistent; and
- that the DOC information corresponds with that scheme rather than an earlier reserved-matters iteration.

The NMA and DOC should not inadvertently result in different versions of the development being treated as the operative scheme for different technical disciplines.

### **Conclusion**

I appreciate that section 96A involves planning judgment.

My concern is therefore not that every individual amendment must necessarily be material. It is that the Council needs sufficient and internally consistent information to make the required judgment

against the **correct approved baseline**, and to assess the **combined planning consequences** of the resulting amended scheme.

The recent A/107/26/NMA and A/165/23/NMA decisions demonstrate that the Council has itself required proper assessment of parking consequences and proper reconciliation of boundary treatments and superseded drawings before being satisfied that the amendments could properly be treated as non-material.

I would therefore be grateful if the matters above could be addressed expressly in the officer assessment before WA/89/26/NMA is determined.

Please place this email on the portal as a supplementary to my objection of 18th September, and please treat the garage-number clarification above as superseding the earlier numerical references in that representation.

Kind regards,

Martin Downes