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From: Amber Willard <Amber.Willard@arun.gov.uk>
Sent: 18 September 2026 09:11
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: WA/89/26/NMA — Objection: cumulative changes to the approved reserved-matters scheme

Please upload as objection for WA/89/26/NMA

Thanks

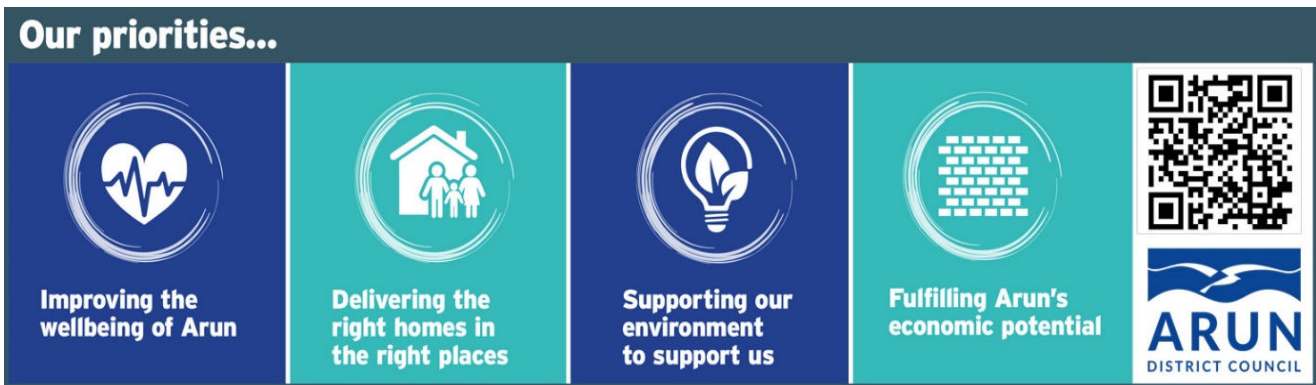
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From: Residents of Walberton - RoW <>

Sent: 18 September 2026 08:27

To: Amber Willard <Amber.Willard@arun.gov.uk>; Cllr. Mel Penycate <Cllr.Mel.Penycate@arun.gov.uk>; Cllr. Sue Wallsgrove <Cllr.Sue.Wallsgrove@arun.gov.uk>

Subject: WA/89/26/NMA — Objection: cumulative changes to the approved reserved-matters scheme

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Dear Officer Willard,

Thank you for your correspondence concerning the relationship between **WA/85/26/DOC** and the proposed amendments to the approved development.

Following validation of **WA/89/26/NMA** on 17th September, I have reviewed the published documents against the reserved-matters drawings and supporting information.

Please register this email and its attachments as an objection and consider them before determination.

My central concern is that the combined amendments materially alter the approved scheme's layout, scale, appearance and landscaping, exceeding the scope of section 96A.

1. Assessment of the complete amendment package

Planning Practice Guidance, "Flexible options for planning permissions", paragraph 002, explains that materiality depends upon the context of the overall scheme and that the authority must be satisfied that the amendment is non-material.

Paragraph 009 confirms that this procedure cannot be used for a material amendment.

I recognise that this involves planning judgment. **However, an assessment of individual changes should also address their combined effect.** Finding each alteration minor in isolation would not adequately answer whether the complete package is non-material.

My objection concerns the changes now proposed against the approved development, rather than reopening the principle of development established by the outline permission.

2. Extent and interrelationship of the redesign

The submitted package affects all four reserved matters:

- **Layout:** garage omissions across numerous plots; changed gardens and cycle-storage arrangements; handing of Plot 28 and alteration of its access path; and relocation of the pumping station from the western part of the site beside the SuDS feature to the surgery car park.
- **Scale:** reductions in scheduled dwelling floor areas, together with changes to building footprints and roof forms.
- **Appearance:** repeated fenestration changes, altered rear doors, removal of architectural features including front gables on identified drawings, introduction of PV panels and ASHPs, and replacement of estate railings with timber post-and-rail fencing.
- **Landscaping:** replacement of all four hard-landscape sheets, all four soft-landscape sheets and the landscape specification, accommodating the altered buildings, gardens, storage, boundaries and infrastructure.

The applicant's supersession schedule replaces the site layout, site sections and house-type drawings collectively covering all 48 dwellings, alongside the landscape package.

The number of replacement drawings does not itself establish materiality. However, their content and geographical coverage demonstrate why the application requires an assessment of the development as a whole.

The covering letter lists garage omissions for 16 plots. The revision history on drawing C9_26_03_PL_HTE_P4 for Plots 28 and 35 additionally records removal of Plot 28's garage, indicating at least 17 omissions. That drawing also records internal-layout revisions removing an en-suite, fenestration amendments and handing. These are linked alterations within a wider programme of changes.

3. Quantified reductions in residential accommodation

The attached accommodation schedules allow direct comparison between the RES layout schedule and the NMA schedule.

Summing their displayed square-metre figures gives:

- RES residential floorspace: **4,269.9 m²**;
- NMA residential floorspace: **4,126.3 m²**;
- net reduction: **143.6 m²**.

Using the tenure allocations recorded in the RES schedule, the open-market plots account for a reduction of **170.4 m²**, **approximately 5.1%**. This is partly offset by increases within the affordable accommodation.

Individual reductions include:

- Plots 19 and 43: **111.2 m² to 93.4 m²**, a reduction of approximately **16%** each;
- Plots 31, 42 and 48: **108.2 m² to 93.7 m²**, approximately **13.4%** each;
- Plots 29, 30 and 40: **96.4 m² to 87.2 m²**, approximately **9.5%** each;
- Plots 39 and 41: **131.5 m² to 123 m²**, approximately **6.5%** each.

The schedule comparison also indicates a reduction at Plot 9, although it is absent from the covering letter's list of 22 reduced dwellings. Please reconcile that discrepancy against the governing approved drawings.

Compliance with minimum space standards would not, by itself, establish that these reductions are non-material. Their effect should be considered alongside garage loss, altered footprints, internal layouts and architectural features.

The pattern is consistent with coordinated value engineering. I do not suggest that cost reduction is inherently objectionable or claim a particular loss in sale value. The relevant evidence is the physical reduction and simplification of the accommodation and its combined planning consequences.

The schedules also appear to change Plots 1 and 13 from 1B2P to 2B3P. Please clarify whether these represent actual accommodation changes or corrections to the earlier schedule.

Repeated architectural changes and the approved design response

The house-type comparisons show a repeated alteration of the development's architectural form, extending beyond the stated reductions in floor area. Examples identified in the comparison include:

- House-type substitutions at Plots 10 and 11, from HTC to HTB1, and Plots 19 and 43, from HTJ to HTB.
- Replacement of twin-gabled roof forms with a single ridge at Plots 22, 23, 25, 26, 32, 33, 46 and 47.
- Removal of prominent front gables at Plots 31, 42 and 48.
- Removal of bays at Plots 29, 30, 34 and 40.
- Removal of chimneys on identified drawings, including Plots 39, 41, 42 and 48.
- Removal of Plot 28's garage wing, alongside the wider programme of garage omissions.
- Repeated internal replanning, including loss of en-suites and, on identified plots, utility or storage accommodation.

These changes overlap: the same dwelling may lose floor area, an architectural feature and internal accommodation. They should therefore be assessed through their combined effect on each building and on the sequence of buildings within the street scene.

Conversely, Plots 7, 8, 17, 18, 20, 21, 44 and 45 already had the single-ridge HTA form. Their consolidation onto replacement drawings is not itself evidence of roof-form alteration. This distinction reinforces the need for a precise comparison against the governing approved drawings.

The conservation consultation history is relevant to that comparison. The November 2024 response raised concerns about standard suburban house types and materials in the setting of Walberton Conservation Area. The January 2025 response identified subsequent design improvements, including at Plots 31, 36 and 48. This does not establish that every individual feature was expressly

required by the Conservation Officer, but it identifies the revised scheme against which the current changes should be assessed.

Some improvements, including full-flint treatment on relevant elevations, appear retained. Nevertheless, the loss of gables, bays, chimneys and roof articulation requires consideration alongside the proposed reductions in larger planting stock and initial boundary screening. The architecture and the landscape intended to integrate it are being changed together.

Please assess the cumulative effects on street-scene variety, building form and the conservation-area setting against that revised RES baseline.

4. Soft landscaping and play provision: changes to the enhancements that secured landscape support

The soft-landscape amendments require assessment against the January 2025 revised scheme and the reasons why that scheme received a favourable landscape response.

The Parks and Landscapes response of 17 December 2024 raised concerns about boundary enhancement, generally small tree stock and the combined LEAP/LAP arrangement. Following revisions dated 17 January 2025, the response of 28 January supported the revised proposals. It expressly identified the increased larger-tree provision, enhanced northern instant hedge, immediate visual structure and rapid establishment, together with two separate age-appropriate play areas.

The current proposals change several of those features.

Comparing the main planting schedules on RES drawing ELVS24539 11 Sheet 1 Revision C and proposed soft-landscape drawing PRI25259 12 Sheet 1 Revision A:

- Extra-heavy standard trees reduce from **66 to 40**, approximately **39.4%**, while the overall standard-tree total increases from 135 to 136. This is a reduction in larger planting stock, rather than a claim that 26 trees disappear.
- Examples include 11 downy birches reducing from 16–18 cm to 10–12 cm girth, and seven whitebeams reducing from 18–20 cm to 12–14 cm girth.
- The approved northern ready-formed instant hedge, specified at 100–125 cm planting height, is replaced by conventional native hedge stock, principally 40–80 cm, with holly at 20–30 cm.
- Native scrub reduces from **4,391 to 3,974 plants**. Within that total, the buffer beside DM Chainsaws reduces from **1,527 to 1,249**, approximately **18.2%**.
- Some shrub quantities increase while their supplied size reduces. For example, *Viburnum tinus* ‘Eve Price’ increases in number but reduces from 60–80 cm planting height and 5–7.5 litre pots to 30–40 cm and 3 litre pots.

I recognise that some planting quantities increase and others remain unchanged. The relevant comparison therefore concerns planting size, form, location and function, as well as total numbers.

These changes raise a substantive question about the initial screening, enclosure and visual structure delivered by the amended scheme, particularly where the landscape consultee expressly supported larger stock and enhanced boundary planting for those purposes.

The proposed written landscape specification appears substantially unchanged, but this does not preserve the former planting sizes or densities. Clause 6.2 requires trees of the scheduled size, while

clause 4.7 refers to the distribution and densities on the detailed proposals. The altered schedules consequently change the landscape delivered under that specification.

There is also a discrepancy concerning play provision. RES play drawing ELVS24539 21 Sheet 1 Revision A expressly records the separation of the LEAP and LAP in response to LPA comments and depicts separate areas. The proposed soft-landscape Sheet 3 instead shows a continuous outline labelled “LEAP & LAP” and omits the earlier detailed-play reference.

Please confirm whether the revised RES detailed play drawing remains operative and compatible with the NMA layout. If retained, the drawings should be reconciled; if altered, the replacement details should identify the separate areas, equipment, accessible routes, surfacing and buffers. I am not assuming from the outline alone that particular equipment or the internal separation has been removed.

Please also confirm continuity of the long-term landscape and play management arrangements. The June 2024 management plan provides for management in perpetuity and identifies Elivia and appointed management companies among the responsible parties. With Doswell now identified in the proposed documentation, the applicable responsibilities and the status of the agreement and notification envisaged by clause 2.4 should be clarified.

I request an updated landscape/play assessment addressing these changes against the reasons for the January 2025 supporting response. The revised planting should also be reconciled with the ecology and habitat-management submissions; the planting quantities alone do not establish a particular biodiversity-unit loss.

These findings add to the cumulative assessment because the application changes the landscape intended to screen, enclose and integrate the development at the same time as changing its buildings, gardens, boundaries and infrastructure. The combined visual and functional consequences require assessment together.

4. Parking, cycle storage and omitted schedule information

The covering letter states that the garages do not constitute formal parking spaces and that their omission would cause no overall loss of parking provision.

This appears inconsistent with the RES Transport Statement. Table 4.2, on its printed page 9, expressly identifies garages measuring 3 metres by 6 metres as counting as **0.5 spaces**. Table 4.1 and paragraph 4.1.3 record **110 allocated spaces and nine visitor spaces**, totalling **119**. The RES accommodation schedule also contains allocations of 2.5 and 3.5 spaces.

Please reconcile the “no overall loss” assertion with that evidence and provide a revised plot-by-plot parking calculation showing the treatment of each omitted garage and any replacement provision.

If all 17 omitted garages were credited at 0.5 spaces and no compensating provision is made, the reduction would be 8.5 credited spaces. I recognise that the actual revised total requires verification against the drawings. Whether the revised provision still meets the applicable standard is a separate question from whether provision has been lost.

Paragraph 4.3.6 also identifies garages as cycle storage for larger properties, with garden sheds serving properties without garages. Their removal therefore changes the cycle-storage arrangements as well as potentially the vehicle-parking calculation.

The NMA schedule omits the RES schedule's tenure, parking and Part M category columns. This does not prove those provisions have changed, but prevents a complete comparison. Please confirm how the approved tenure and accessible/adaptable housing provision are retained within the revised house types and layouts, including the Category 3 provision identified in the RES schedule.

The revised layout should also account for the Transport Statement's EV-charging commitments, particularly wherever charging equipment would otherwise have been associated with a deleted garage.

5. Pumping-station relocation and the dentist surgery

The surgery remains identified on the NMA layout and schedule at 188.8 m², with 10.5 m² for refuse and cycle storage. The supersession schedule marks the surgery drawings and refuse-store detail as unchanged.

Its surroundings nevertheless change through relocation of the pumping station into the north-eastern corner of its car park.

BP Civils drawing **000-BPC-WD-ZZ-D-C-PL401, Proposed Drainage GA Sheet 2**, identifies the original station as a **"DCG Type 3 layout"**. It depicts a dedicated access spur, outward-opening gates and a separate standing area alongside the equipment. It also records a **"15m offset to be clear of habitable dwellings"**.

Water UK's Design and Construction Guidance, Version 2.3 dated 11 November 2023, Figure D3 on page 80, illustrates a typical Type 3 station with a **10-metre by 3.8-metre tanker hardstanding**, gate access and a clear approach.

I recognise that this is a typical arrangement and that an acceptable site-specific design may differ. However, the NMA Street Scene/Context Plan does not demonstrate the equivalent operational arrangement for the relocated station.

Please establish:

- the proposed chamber, equipment and servicing layout;
- the maintenance vehicle's approach, manoeuvring and standing position;
- whether servicing depends upon occupying surgery parking bays or its circulation area;
- the consequences for accessible parking, pedestrian routes and refuse/cycle-store access; and
- appropriate separation and the noise, odour and maintenance implications at the new location.

Retaining parking bays on a drawing does not establish that they and their access remain usable during servicing. Any additional hardstanding, compound enlargement or access changes required should be included in the assessment of the relocation.

The original drawing's 15-metre annotation also warrants reconciliation with the new location; I do not suggest it automatically establishes a universal statutory exclusion distance.

6. Acoustic boundary: scope and consistency of the application

The NMA expressly identifies estate railings being replaced by post-and-rail fencing. Please confirm whether any change is also proposed to the approved acoustic boundary wall, and identify the drawings and specifications that will govern its construction.

Please clarify which approved and proposed drawings govern the acoustic barrier, whether its alteration forms part of this NMA, and how it relates to WA/85/26/DOC.

If included, the change's effects on appearance, enclosure, landscaping and acoustic protection should contribute to the assessment of the complete amendment package. If excluded, the retained approved details and DOC proposals need to be reconciled.

7. Relationship with WA/85/26/DOC

The covering letter expressly connects the NMA with the DOC energy and acoustic submissions.

Together, the changes raise questions about the continuing applicability of the approved parking, cycle-storage, accessibility, energy, acoustic, drainage and landscape arrangements. These are consequences of the redesign and corroborate the need for a collective assessment.

For example, garage removal affects built form, gardens, parking and cycle storage simultaneously. Pumping-station relocation affects drainage infrastructure, servicing, the surgery environment, landscaping and potentially acoustic conditions. These relationships cannot be fully understood by assessing each drawing alteration separately.

Energy evidence and coordination with the revised house types

The Resolution Energy letter dated 17 August 2026 reports a site-average renewable or low-carbon contribution of 74.29%, using six representative plot models. However, the relationship between those models and the revised NMA dwellings requires explanation.

For example, the model uses Plot 5 at 94.8 m² and Plot 9 at 119.8 m², whereas the NMA schedule records 93.4 m² and 115.4 m² respectively. The representative Plot 13 model is described as a 1B2P ground-floor flat at 64.5 m², while the NMA schedule identifies that plot as 2B3P at 65.7 m². Representative models are also applied to groups containing different dwelling forms and areas.

Representative modelling is not inherently inappropriate, and these discrepancies do not themselves establish failure to meet Condition 4. They do, however, require a transparent reconciliation explaining whether the models remain representative of the amended development and whether the reported result remains applicable.

The energy strategy specifies three PV panels per dwelling, equivalent to 144 panels and 61.92 kWp across 48 dwellings. It distinguishes external ASHP systems for houses from internal hot-water heat pumps and electric space heating for flats. The drawing package should accurately reflect that distinction.

The NMA drawings describe PV and heat-pump locations as indicative. Please identify the proposed siting and equipment parameters relied upon for the assessment of appearance, roofscape and acoustic effects, and explain their consistency with the energy calculations.

The potential benefits of renewable equipment should be considered, but meeting the energy condition does not by itself answer whether the complete architectural and landscape amendment package is non-material.

8. Requested outcome

In my view, the combined changes materially alter the approved reserved-matters scheme, and I therefore request refusal of WA/89/26/NMA.

Before reaching any contrary conclusion, please resolve the discrepancies identified above and record an assessment explaining why the complete package, including its operational consequences, is considered non-material.

I am not prescribing an alternative application route. If the changes are material, the applicant should pursue whatever alternative procedure is lawfully available.

Please acknowledge receipt and place this email and all attachments on the public portal file. I would appreciate confirmation that they will be considered before determination.

Attachments:

1. NMA – RES – Accommodation Schedule Comparison.
2. WA/52/24/RES Transport Statement extract, PDF pages 12–14, printed pages 8–10.
3. Water UK Figure D3 – Typical Type 3 pumping station layout.

Kind regards,

Martin Downes