

To: Adur District Council Planning Department

Application for a Non-Material Amendment (Section 96A)

Site Address: Normandy House, Old Shoreham Road, Lancing, West Sussex BN15 0QS

Original Planning Ref: AWDM/0766/23

Appeal Ref: APP/Y3805/W/23/3334710

Subject: Justification for Non-Material Amendment to Description of Development

Dear Planning Officer,

This application seeks a non-material amendment to the description of development for the above site, which was recently granted permission on appeal (Ref: APP/Y3805/W/23/3334710).

The current description states the home is for a "maximum of five children, with four carers." Following a recent registration visit from **Ofsted**, it has been identified that this wording creates a "regulatory deadlock" that prevents the home from opening.

Under the **Children's Homes (England) Regulations 2015 (Regulation 27)**, every registered home must have a **Registered Manager** and/or Deputy Manager to provide lawful oversight and leadership. Ofsted interprets the current planning description ("four carers") as a total personnel cap. This makes it impossible for us to provide the required number of front-line care staff while also having the mandatory management present on-site.

We request the description be amended to:

"...a maximum of five children, with a maximum of four care staff on-site at any one time, plus a Registered Manager and/or Deputy Manager, with allowance for on-call staff in exceptional circumstances as required by Ofsted statutory regulations."

The amendment is non-material for the following reasons:

Statutory Requirement: The change is required solely to comply with national safety standards. The manager's role is primarily administrative/supervisory and office-based.

No Change in Intensity: The number of children remains at five. The presence of a manager or an on-call staff member for emergencies does not fundamentally change the "character" of the use beyond what the Inspector already deemed acceptable.

Highways Impact: As noted in Paragraph 9 of the Appeal Decision, the Inspector was satisfied that vehicular comings and goings would be similar to a family dwelling. The site at Normandy House has sufficient on-site parking to accommodate management and shift handovers without impact on the A27.

Without this minor wording correction, the property—despite having C2 permission—cannot be legally registered or operated.

Yours faithfully,

Ashley Davis
Davis Homes Ltd