n.j.a town planning Ltd

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FAO Caroline Harvey
The Planning Inspectorate
Temple Quay House
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NJA Ref: 22/188

07 January 2026

FINAL COMMENTS

Dear Ms Harvey

PINS Ref: **APP/Z3825/W/25/3374889**
Appellants: **Mr and Mrs Sherwood**
Site: **Recadera Stud, Ghyll House Farm, Broadwater Lane, Copsale, RH13 6QW**

Thank you for your letter dated 18 December 2025. Please find attached the Appellants' final comments in response to the Council's Statement of Case and third party comments.

If you have any queries or require any further information, please do not hesitate to contact me.

Yours sincerely

[redacted]

Nikolas J. Antoniou
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Chartered Town Planner
For and on behalf of NJA Town Planning Ltd

RTPI Chartered Town Planner

Appeal Ref: **APP/Z3825/W/25/3374889**

Appellants: Mr and Mrs Sherwood

Site: Recadera Stud, Ghyll House Farm, Broadwater Lane, Copsale, RH13 6QW

APPELLANTS' FINAL COMMENTS

1.0 Horsham District Council's Statement of Case

1.1 The Council's Statement of Case relies upon the spatial strategy of the HDPF. However, for the reasons set out within the Appellants' Statement of Case, it is demonstrated that the proposal complies with the provisions of 11 d) which is engaged on the basis that the Council cannot demonstrate a five year housing land supply as required by the Framework. It is reiterated that the Council's policies for the supply and location are in this case out of date and should be given less weight in the decision making process.

1.2 In terms of location, this matter is addressed within the Appellants' Statement of Case together with the Council's recently published Shaping Development in Horsham District' guidance.

1.3 It is noted that the Council's Statement of Case states in respect of reason for refusal 2 and the drafted Great Crested Newt License that ***'The LPA would not upon receipt of these documents during the appeal process maintain this reason for refusal'.***

Third Party Comments

1.4 The representation letters largely repeat earlier comments and no new issues are seemingly raised that have not been previously considered by the Appellant or the LPA. The Appellants confirm that Certificate B was completed and appropriate notices served. All ecology concerns have been addressed with the NatureSpace licence.

1.5 For the reasons set out above and in the Appellants Statement of Case it is respectfully requested that the appeal be allowed.