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Our ref: DC/26/0084
Your ref: 6008205
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Please ask for: Daniel Holmes
Date: 10th September 2026

Dear Inspector,

Use of land for Permission in Principle (PIP) application for the demolition of existing structures / buildings and erection of 1no dwelling at

**Barnards Nursery, Rock Road, Washington, West Sussex, RH20 3BH
National Planning Policy Framework 2026 Publication Council Response**

1. Introduction

- 1.1 The Council refers to your correspondence sent on 9th September 2026 inviting comments on the implications of the National Planning Policy Framework published on 17 August 2026.
- 1.2 The Council's position remains that the appeal proposal, comprising Permission in Principle for the demolition of existing nursery structures and the erection of 1 dwelling at Barnards Nursery, conflicts with the Development Plan and was correctly refused planning permission for the reasons set out in the Council's decision notice, Officer Report and Statement of Case.
- 1.3 The comments below therefore address the extent to which the revised Framework affects the Council's previous assessment and the overall planning balance. Unless expressly stated otherwise, the Council relies upon and maintains the evidence and conclusions contained within its previously submitted Statement of Case.

2. Effect of NPPF 2026

- 2.1 The Council acknowledges that the revised National Planning Policy Framework 2026 is a material consideration and that it must be taken into account in the determination of this appeal. However, whilst the revised Framework has introduced changes to national planning policy, the Council does not consider that these changes materially alter the fundamental planning concerns identified in respect of this site, namely its location outside any defined built-up area boundary, its position within the countryside, and the resulting conflict with the Development Plan's spatial strategy for directing housing growth to sustainable locations.

- 2.2 The Council accepts that the revised Framework places increased emphasis on housing delivery and introduces new policy provisions relating to development outside settlements, including Policy S5 and Policy HO7. The Council further accepts that the District remains unable to demonstrate a five-year supply of deliverable housing sites and that the delivery of additional housing attracts significant weight in favour of development. These matters were previously acknowledged within the Officer's Report and Statement of Case and remain material considerations in the determination of the appeal.
- 2.3 However, the Council does not agree that the publication of the revised Framework materially alters the overall planning judgment in this case. The principal issue at appeal remains whether the appeal site represents an appropriate location for a new residential planning unit having regard to its position outside any defined Built-Up Area Boundary and its relationship to the wider settlement pattern. The Council's reason for refusal was not based solely upon housing land supply considerations, but upon the site's conflict with the Development Plan spatial strategy which seeks to direct new housing development towards sustainable locations and resist unjustified residential development in the countryside
- 2.4 The Council notes the appellant's reliance upon Policy S5(1)(e) of the revised Framework and the contention that the proposal constitutes "limited infilling within groups of houses". The applicability of that policy provision is addressed separately below. However, even where a proposal falls within one of the categories identified within Policy S5, the Framework still requires a planning judgment to be undertaken having regard to the relevant national policies and the circumstances of the individual case. The Council does not consider that the revised Framework displaces the statutory requirement for decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise, nor does it establish a presumption that all housing proposals outside settlement boundaries should be approved.
- 2.5 Accordingly, whilst the Council accepts that the revised National Planning Policy Framework 2026 is capable of attracting additional weight in favour of the proposal, particularly in respect of housing delivery, it does not consider that the revised policy context removes or materially diminishes the harm identified in the Council's decision. The Council's position therefore remains that the appeal proposal conflicts with the Development Plan spatial strategy and that the overall planning balance continues to weigh against the grant of planning permission.

3. Policy S5(1)(e) Limited Infilling within groups of houses

- 3.1 The appellant places significant reliance upon Policy S5(1)(e) of the revised National Planning Policy Framework 2026, contending that the appeal proposal constitutes "limited infilling within groups of houses" and therefore represents a form of development which should be supported under national policy. The Council does not agree with this interpretation.
- 3.2 The central issue is not whether there are individual dwellings located in the vicinity of the appeal site, but whether the site forms part of a sufficiently defined and cohesive

group of houses such that the proposal can properly be characterised as infilling. The Council's position remains that the appeal site lies outside the defined Built-Up Area Boundary and is situated within a dispersed rural environment characterised by sporadic development, open land, agricultural uses, and areas of mature vegetation. The pattern of development along Rock Road is not one of a continuous frontage or compact group of dwellings, but rather a loose collection of properties interspersed with substantial gaps and areas of countryside. The site therefore reads as part of the wider countryside rather than as an undeveloped gap within an otherwise cohesive group of houses.

- 3.3 As identified within the Council's Officer Report and Statement of Case, the appeal site does not form a logical extension to the settlement of Storrington, nor does it function as part of a consolidated settlement edge. Whilst residential properties are located to the north and south of the site, these dwellings are sporadically arranged and separated by areas of open land and vegetation. The existence of nearby dwellings does not, in itself, establish the presence of a "group of houses" for the purposes of Policy S5(1)(e). The Council considers that the appellant's assessment gives insufficient regard to the wider spatial character of the area and the role the site presently performs as part of the transitional countryside between existing built form. Nor does the presence of development on all sides automatically indicate infilling. The proper consideration is whether the site forms part of a cohesive group of houses where the proposal would fill a small gap in an otherwise continuous pattern of development. The Council maintains that the appeal site does not have these characteristics.
- 3.4 Furthermore, the appeal proposal would not simply fill a small gap within an otherwise continuous pattern of residential development. Rather, it would introduce a new residential planning unit onto a site currently occupied by former nursery structures associated with a historic commercial horticultural use. The proposal therefore represents a change in the character and function of the land, introducing residential development into a location where housing has not previously formed part of the established land use pattern. The fact that the site contains existing built structures does not, in the Council's view, transform the site into an infill plot within a group of houses.
- 3.5 The Council also notes that Policy S5 must be read as a whole and applied in the context of the Framework's wider objectives relating to sustainable patterns of growth and the protection of the countryside. The identification of certain forms of development within Policy S5 does not remove the requirement to assess the particular characteristics of a site, nor does it automatically override conflict with the Development Plan spatial strategy. In this case, the proposal would remain contrary to the established strategy of directing housing growth towards sustainable settlements and would contribute to the incremental extension of residential development into the countryside.
- 3.6 The Council further notes that the revised Framework continues to place significant emphasis on achieving sustainable patterns of development. In this regard, Policy CC2 seeks to ensure that development supports climate change mitigation by reducing the need to travel and directing growth towards sustainable locations. Future occupiers of the appeal site would remain heavily reliant on private vehicle use for many day-to-day journeys, a concern identified within the Officer's Report and Statement of Case. The Council therefore considers that the proposal does not align with the broader

sustainability objectives of the Framework, notwithstanding the appellant's reliance on Policy S5(1)(e).

- 3.7 For these reasons, the Council does not consider that the appeal proposal falls within the scope of "limited infilling within groups of houses" as envisaged by Policy S5(1)(e). Even if the Inspector were to conclude otherwise, the Council maintains that the proposal must still be assessed against the Framework as a whole and that the identified conflict with the Development Plan spatial strategy continues to attract substantial weight in the overall planning balance.

4. Policy H07 Housing need and housing delivery

- 4.1 The Council acknowledges the appellant's reliance upon Policy HO7 of the revised National Planning Policy Framework 2026, which requires substantial weight to be given to the benefits of providing homes that contribute towards meeting evidenced housing needs. The Council accepts that this is a material consideration and recognises that the appeal proposal would contribute, albeit modestly, towards the delivery of housing within the District.
- 4.2 The Council further accepts that it is currently unable to demonstrate a five-year supply of deliverable housing sites and that housing delivery within the District has been significantly below identified requirements. These matters were acknowledged within the Officer's Report and Statement of Case and remain relevant considerations attracting weight in favour of the proposal. The Council also accepts that the delivery of an additional dwelling would provide a small contribution towards addressing the District's housing needs.
- 4.3 However, the Council does not agree that Policy HO7 materially alters the overall planning balance in this case. The housing benefit associated with the proposal was accepted by the Council throughout the determination of the application and was expressly considered when assessing the proposal against the presumption in favour of sustainable development. The publication of the revised Framework does not create a new benefit which was previously absent from the assessment but rather reinforces the importance of a benefit that has already been recognised and weighed in favour of the development.
- 4.4 Whilst Policy HO7 requires substantial weight to be afforded to housing delivery, it does not indicate that housing proposals should be approved irrespective of their location or their compliance with the wider objectives of the Framework. The policy must be read alongside the Framework as a whole, including those policies concerned with achieving sustainable patterns of development and directing growth to appropriate locations. The statutory requirement that planning decisions should be taken in accordance with the Development Plan unless material considerations indicate otherwise also remains unchanged.
- 4.5 The Council notes that Policy HO7 does not operate in isolation and must be read alongside the wider objectives of the Framework. In particular, Policy CC2 continues to emphasise the need to support sustainable patterns of growth and reduce reliance on

private vehicle travel. Whilst the delivery of housing attracts substantial weight, the location of that housing remains an important consideration. The appeal proposal would provide a dwelling in a location outside a defined settlement boundary where future occupiers would remain reliant on the private car for a range of day-to-day needs. As such, the housing benefits identified by Policy HO7 do not negate the sustainability concerns arising from the site's location.

- 4.6 In the present case, the proposal would deliver a single market dwelling on a site outside any defined Built-Up Area Boundary and in a location which the Council considers to be contrary to the established spatial strategy of the Development Plan. Whilst the contribution of one dwelling attracts weight in favour of the proposal, the scale of that contribution is necessarily limited. The proposal would not address the housing shortfall in anything other than a modest way and must therefore be balanced against the identified harm arising from the site's countryside location and conflict with the plan-led strategy for growth
- 4.7 The Council therefore accepts that greater weight should be attributed to the housing delivery benefits of the proposal under Policy HO7 than may previously have been the case. Nevertheless, even attributing substantial weight to those benefits, the Council's position remains that they do not outweigh the harm arising from the introduction of a new residential planning unit in an unsuitable countryside location outside the settlement hierarchy established by the Development Plan.
- 4.8 Accordingly, whilst the revised National Planning Policy Framework 2026 strengthens the weight to be afforded to housing delivery, the Council does not consider that Policy HO7 fundamentally alters the conclusions reached in the Officer's Report, the Statement of Case, or the overall planning balance before the Inspector. The proposal continues to conflict with the Development Plan's spatial strategy, and the Council maintains that the identified adverse impacts outweigh the benefits of delivering a single dwelling in this location.

5. Overall Planning Balance

- 5.1 The Council acknowledges that the revised National Planning Policy Framework 2026 introduces a materially different decision-making framework for development proposals located outside settlements. In particular, Policy S5 identifies a number of forms of development which may be supported in principle outside settlements, including the redevelopment of previously developed land. The Council also acknowledges that the appeal proposal would deliver one additional dwelling and would result in the removal of the existing dilapidated nursery structures currently occupying the site. These matters attract weight in favour of the proposal.
- 5.2 The Council further acknowledges that Policy HO7 requires substantial weight to be given to the benefits of providing homes which contribute towards meeting evidenced accommodation needs and that Horsham District remains subject to significant housing delivery challenges. The delivery of an additional dwelling would therefore make a positive, albeit limited, contribution towards meeting housing need.

- 5.3 In addition, the site contains a collection of substantial former nursery buildings, glasshouse structures, and hardstanding. The Council acknowledges the appellant's reliance on the previously developed nature of the site and accepts that the existing glasshouse structures and associated buildings represent substantial built form. However, even if the Inspector were to conclude that the site falls within the revised definition of previously developed land, the Council maintains that this factor does not override the site's countryside location being physically and functionally separate from the settlement, or the conflict with the Development Plan's spatial strategy.
- 5.4 However, these benefits must be balanced against the adverse effects arising from the proposal. The appeal site remains outside any defined settlement boundary and therefore falls to be considered as development outside a settlement under Policy S5. Whilst the revised Framework provides greater support for certain forms of development in countryside locations, it continues to emphasise the importance of achieving sustainable patterns of growth and directing development to locations which are well related to settlements and supported by appropriate infrastructure. Policies S5 and TR3 make clear that development should promote sustainable patterns of movement and limit reliance upon private vehicles wherever possible.
- 5.5 The Council maintains that the site occupies a countryside location which is physically and functionally separate from the main built form of Storrington and Washington. Future occupiers would remain reliant upon the private car for many day-to-day activities and the proposal would not represent a location that performs strongly against the sustainability objectives set out within Policies S5 and TR3 of the Framework.
- 5.6 The Council further notes that this appeal relates to Permission in Principle only. The question before the Inspector is therefore whether the principle of introducing a new residential planning unit in this location is acceptable. The Council's concerns arise from the location, land use and amount of development and are not matters capable of being addressed through future Technical Details Consent.
- 5.7 Furthermore, notwithstanding the changes introduced by the revised Framework, the proposal remains in conflict with the spatial strategy of the Development Plan, which seeks to direct residential growth towards sustainable settlements and avoid unplanned residential development within the countryside. Whilst Annex A of the revised Framework advises that development plan policies should not be given reduced weight solely due to age, the Council recognises that the weight attributable to individual policies is ultimately a matter for the decision maker. Nevertheless, the underlying objectives of the Development Plan in promoting a plan-led pattern of growth remain relevant and attract significant weight.
- 5.8 Taking all matters into account, the Council considers that the benefits arising from the provision of one dwelling, the redevelopment of previously developed land and the removal of the existing nursery structures are modest. These benefits are not considered sufficient to outweigh the adverse effects arising from the site's countryside location, its poor relationship to the established settlement pattern and the conflict with the Development Plan's spatial strategy.

6. Conclusion

- 6.1 The Council has reviewed the appellant's submissions in light of the revised National Planning Policy Framework 2026 and accepts that the policy context has changed since the determination of the application. However, whilst greater weight may now be afforded to the redevelopment of previously developed land outside settlements, the Council does not consider that the revised Framework alters the overall planning merits of the appeal to such an extent that a different decision should be reached.
- 6.2 The proposal would introduce a new market dwelling in a countryside location outside any defined settlement boundary. Although the site contains existing built development and the proposal would secure some environmental and visual benefits through the clearance of redundant nursery structures, the Council considers that the site remains an unsuitable location for residential development when assessed against the Framework as a whole, particularly Policies S5 and TR3.
- 6.3 For the reasons set out above, and having regard to the evidence contained within the Council's original Statement of Case, the Council respectfully maintains its position that the adverse effects of the development outweigh its benefits and that the appeal should therefore be dismissed.

Yours faithfully,

Daniel Holmes MSC MRTPI
Senior Planning Officer