

Statement of Case for the Local Planning Authority

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PLANNING INSPECTORATE REFERENCE:	6008205
HORSHAM DISTRICT COUNCIL REFERENCE:	DC/26/0084

Town and Country Planning Act 1990

Planning appeal by **Mr Oguzhan Denizer** at:
Barnards Nursery, Rock Road, Washington, RH20

The appeal relates to application DC/26/0084 for Permission in Principle (PIP) application for the demolition of existing structures / buildings and erection of 1no dwelling.

27th May 2026

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1.0 Main Issues

1.1 The main issues are considered to be:

1. Whether the location of the site is suitable for residential development having regard to the Development Plan spatial strategy and national policy;
2. Whether the proposed residential use is acceptable in principle in this countryside location;
3. Whether the amount of development (one dwelling) is appropriate having regard to the plan-led approach to growth and potential cumulative impacts;
4. The weight to be afforded to material considerations, including:
 - (i) The Council's housing land supply position and Housing Delivery Test performance;
 - (ii) Previously Developed Land;
 - (iii) Distinction from Cited Appeal Decisions
5. Whether, overall, the proposal represents sustainable development when assessed against the Framework, including the application of the presumption in favour of sustainable development.

2.0 Introduction and Appeal Procedure

2.1 This Statement of Case is submitted on behalf of Horsham District Council ("the Council"), the Local Planning Authority, in response to an appeal made under Section 78 of the Town and Country Planning Act 1990 against the refusal of planning permission for:

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

2.2 The application was decided under delegated authority with a decision issued on 24th February 2026,

2.3 The Council will rely on the Officer's Delegated Report as part of its evidence, which sets out the full assessment of the proposal.

2.4 Planning Permission was refused for the following reason:

Refusal Reason: -

The proposed development would be sited within an unsustainable location in the countryside, outside of a defined built-up area boundary, and on a site not allocated for housing development within the Horsham District Planning Framework, or a made Neighbourhood Plan. Furthermore, the proposed development is not essential to its countryside location. Notwithstanding the absence of a five-year land housing supply, and the provisions of the National Planning Policy Framework (2024) at paragraph 11(d), it is not considered that there are any material considerations in this instance which would outweigh harm arising from conflict with Policies 2, 3, 4 and 26 of the

Horsham District Planning Framework (2015) and Policies 1 and 8 of the Storrington, Sullington and Washington Neighbourhood Plan (2019).

- 2.5 For the reasons set out in this Statement, the Council respectfully requests that the appeal be dismissed.

3.0 The Appeal Site and Surroundings

- 3.1 A full description of the site and its context is set out within the Officer's Delegated Report, which the Council relies upon for the purposes of this appeal. The summary below is provided to establish the agreed baseline against which the appeal proposal should be assessed.
- 3.2 The appeal site is located on the eastern side of Rock Road, Washington, outside of any defined Built-Up Area Boundary and therefore within the countryside for the purposes of the Development Plan.
- 3.3 The site comprises a former commercial horticultural nursery known as Barnards Nursery and contains a number of redundant nursery structures, including substantial glasshouse frames, ancillary outbuildings, areas of hardstanding and associated infrastructure, much of which is now in a dilapidated condition. The site is served by an existing access track extending eastwards from Rock Road.
- 3.4 The site is enclosed in part by mature vegetation, including a belt of tall conifer trees along the western and southern boundaries, with further established trees and vegetation to the eastern boundary. Notwithstanding the level of screening, the existing nursery structures remain substantial in scale and occupy a significant proportion of the site, giving the land a previously developed character.
- 3.5 The surrounding area is characterised by a loose and sporadic pattern of development interspersed with open land, agricultural fields and farm buildings. Residential properties are located to the north and south of the site, although these are generally well separated and do not form a continuous built frontage. The defined Built-Up Area Boundary of Storrington and Sullington lies approximately 450 metres to the west of the site.
- 3.6 The site lies outside the South Downs National Park, although the National Park boundary is located approximately 160 metres to the west. There are no statutory or locally listed heritage assets within the site itself.

4.0 The Proposal

- 4.1 The proposal seeks Permission in Principle (PiP) for the demolition of existing structures / buildings and erection of 1no dwelling . Under the PiP regime, only the following matters are for consideration:

- Location
 - Land use
 - Amount of development
- 4.2 All detailed matters—including layout, design, access arrangements, landscaping, drainage, and environmental mitigation—are reserved for subsequent Technical Details Consent.
- 4.3 The proposal therefore establishes only the principle of residential development on the site, rather than its detailed form.
- 4.4 The proposal would involve the redevelopment of the former nursery site, including the removal of the existing glasshouses and associated buildings, to establish the principle of residential redevelopment for a single dwelling.

5.0 Relevant Planning Policy Framework

- 5.1 In determining this appeal, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the decision be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 The statutory Development Plan for the purposes of this appeal comprises the following:
- a) Horsham District Planning Framework (2015) (“HDPF”)
 - b) Storrington, Sullington and Washington Neighbourhood Plan (2019):

Key Development Plan Policies

- 5.3 HDPF Policies
Policy 2 – Strategic Development
Policy 3 – Development Hierarchy
Policy 4 – Settlement Expansion
Policy 26 – Countryside Protection
- 5.4 Policy 2 directs the majority of development to the District’s most sustainable settlements, including Billingshurst, in order to maximise access to services, facilities and sustainable transport options.
- 5.5 Policy 3 seeks to maintain the established settlement hierarchy and ensure that development is located in the most sustainable locations.
- 5.6 Policy 4 permits limited expansion of settlements beyond built-up area boundaries only where specific criteria are met, including that development adjoins the settlement boundary, is proportionate in scale, meets identified needs, and is contained within defensible boundaries.

- 5.7 Policy 26 seeks to protect the countryside from inappropriate development, permitting only uses that are essential to a rural location or meet defined exceptions.

Storrington, Sullington and Washington Neighbourhood Plan (2019) Policies

Policy 1 – A Spatial Plan for the Parishes

Policy 8 – Countryside Protection

- 5.8 Policy 1 seeks to establish and manage the settlement boundaries of Storrington, Sullington and Washington in order to direct new development to the most appropriate locations whilst protecting the surrounding countryside from uncontrolled growth. Outside the BUABs, development is more restricted and will generally only be supported where it relates to allocated sites, specified exception areas or the redevelopment of previously developed land outside the South Downs National Park, subject to compliance with other Development Plan policies.
- 5.9 The policy requires development to accord with countryside protection policies within the wider Development Plan. Accordingly, the policy reinforces the overarching spatial strategy of focusing development within sustainable settlements while limiting unjustified encroachment into the countryside.
- 5.10 Policy 8 seeks to protect the landscape, natural beauty and cultural heritage of the rural areas within the Neighbourhood Plan area.

National Planning Policy Framework (NPPF)

- 5.11 The National Planning Policy Framework (NPPF) is a material consideration. Of particular relevance to this appeal is paragraph 11(d), which is engaged in this case because the Council cannot demonstrate a five-year supply of deliverable housing sites and has a Housing Delivery Test result below 75%, with the consequence that the policies most important for determining the application are considered out-of-date.
- 5.12 In such circumstances, the presumption in favour of sustainable development applies, often referred to as the “tilted balance,” whereby planning permission should be granted unless either:
- (i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusal; or
 - (ii) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole.
- 5.13 However, decisions must still assess whether development is sustainable and appropriately located.

Policy Conclusion

- 5.14 The Development Plan establishes a clear spatial strategy which directs development to sustainable locations and restricts unjustified development in the countryside. The appeal proposal conflicts with this strategy for the reasons set out under the main issues below.

Main Issues

6.0 Main issue 1: Location of the site

- 6.1 The principal issue is whether the appeal site represents an appropriate and sustainable location for residential development having regard to the Development Plan spatial strategy. The appeal site lies outside of any defined Built-Up Area Boundary and is therefore located within the countryside in policy terms. As identified within the Officer's Report, Policies 2 and 3 of the Horsham District Planning Framework (HDPF) seek to direct the majority of development towards the District's most sustainable settlements in order to ensure that growth occurs in locations with appropriate access to services, facilities and infrastructure. The appeal site does not fall within such a location and is therefore fundamentally at odds with the established spatial strategy.
- 6.2 Policy 4 of the HDPF permits limited expansion beyond built-up area boundaries only where specific criteria are satisfied, including that the site adjoins the settlement edge, is appropriate in scale and function, and would not result in harmful encroachment into the countryside. The appeal site is not allocated for development within either the HDPF or the Storrington, Sullington and Washington Neighbourhood Plan and does not form a logical extension to the settlement. Whilst the appellant places reliance on the proximity of the Storrington settlement boundary, the Officer's Report identifies that the site remains physically and visually separate from the built form of the village, with intervening open land and sporadic development patterns preventing the site from functioning as part of a cohesive settlement edge. Accordingly, the proposal fails to satisfy the requirements of Policy 4.
- 6.3 Policy 1 of the Storrington, Sullington and Washington Neighbourhood Plan reinforces the Development Plan spatial strategy by directing development within the defined Built-Up Area Boundaries and requiring proposals outside those areas to comply with countryside policies of the wider Development Plan. Whilst the policy acknowledges that the reuse of previously developed land outside the South Downs National Park may be supported in principle, such support is expressly subject to compliance with the wider Development Plan. In this instance, the proposal conflicts with the strategic objectives of Policies 2, 3, 4 and 26 of the HDPF and therefore does not gain policy support through Policy 1.
- 6.4 In spatial terms, the appeal proposal would introduce a new residential planning unit within a rural area characterised by a loose and dispersed pattern of development interspersed with open land, agricultural uses and substantial vegetation. Whilst there

are residential properties to the north and south of the site, these are sporadically arranged and do not form a continuous or consolidated built frontage. The site presently reads as part of the transitional countryside edge rather than as part of the settlement itself. The proposal would therefore contribute to incremental encroachment into the countryside and would erode the distinction between the built-up area and the surrounding rural landscape.

- 6.5 The Officer's Report further identifies that, notwithstanding the relative proximity of Storrington, the site would remain reliant upon private vehicle use for many day-to-day activities. Whilst some services and facilities may be accessible by foot, the site is not well integrated into the settlement pattern and future occupiers would be likely to rely heavily on the private car for employment, education, healthcare and wider retail needs. The proposal would therefore fail to represent development in a genuinely sustainable location consistent with the objectives of the Development Plan spatial strategy.
- 6.6 The Council acknowledges that the site contains substantial former nursery structures. The removal of the existing dilapidated glasshouses could provide some visual improvement to the site. However, national and local policy do not provide automatic support for residential redevelopment of previously developed land where doing so would conflict with the overarching spatial strategy or result in unjustified residential encroachment into the countryside. While the site is previously developed, this does not outweigh the identified harm arising from its unsustainable location and conflict with the spatial strategy. The previously developed nature of the site does not therefore outweigh the fundamental locational conflict identified.
- 6.7 The Council is presently unable to demonstrate a five-year supply of deliverable housing sites and therefore paragraph 11(d) of the National Planning Policy Framework (2024) is engaged. However, the tilted balance does not displace the requirement to assess whether the appeal site represents a suitable and sustainable location for development. The Council considers that the modest benefits arising from the provision of a single dwelling, together with the redevelopment of previously developed land, are insufficient to significantly and demonstrably outweigh the harm arising from conflict with the Development Plan spatial strategy and the resulting encroachment into the countryside.
- 6.8 For these reasons, the Council considers that the appeal site represents an inappropriate and unsustainable location for residential development and that the proposal conflicts with Policies 2, 3, 4 and 26 of the Horsham District Planning Framework (2015), together with Policies 1 and 8 of the Storrington, Sullington and Washington Neighbourhood Plan (2019). This conflict attracts substantial weight in the overall planning balance.

7.0 Main Issue 2: Landuse

- 7.1 The second main issue is whether the proposed residential use is acceptable in principle having regard to the Development Plan and national policy. As set out under

Main Issue 1, the site is located in the countryside and not part of a cohesive settlement. In this context, the acceptability of residential use in principle must be assessed against countryside protection policies.

- 7.2 Policy 26 of the Horsham District Planning Framework (HDPF) seeks to protect the countryside against inappropriate development and supports only those forms of development that are essential to a countryside location, or which fall within a limited range of specified exceptions. These include development associated with agriculture, forestry, rural enterprise, outdoor recreation or other forms of sustainable rural development. The appeal proposal does not meet any of these exceptions. The proposal is for a market dwelling with no functional or operational requirement to be located within the countryside and is unrelated to any rural enterprise or land-based use. The proposal therefore represents a form of residential development that Policy 26 is specifically intended to restrict.
- 7.3 The Officer's Report further identifies that the principle of residential development on the appeal site conflicts with the wider spatial strategy established through Policies 2, 3 and 4 of the HDPF. These policies collectively seek to direct new housing growth towards sustainable settlements and prevent sporadic or unplanned residential encroachment into the countryside. The appeal site is not allocated for housing development within the Development Plan and does not form part of a planned or coherent extension to Storrington or Sullington. The proposal would therefore introduce a new residential use into the countryside in a manner that is inconsistent with the plan-led approach to growth.
- 7.4 Policy 1 of the Storrington, Sullington and Washington Neighbourhood Plan reinforces this position by defining the Built-Up Area Boundaries for the settlements and directing development within those areas. Whilst the policy acknowledges that the reuse of previously developed land outside the South Downs National Park may be supported in principle, such support is expressly subject to compliance with the wider Development Plan. In this instance, the proposal conflicts with the strategic countryside protection and settlement policies of the HDPF and therefore does not gain support through Policy 1. Furthermore, Policy 8 of the Neighbourhood Plan seeks to protect the intrinsic character and beauty of the countryside and resist development that would undermine the rural setting of the parish.
- 7.5 The Council acknowledges that the site contains substantial former nursery buildings and glasshouse structures and therefore possesses characteristics of previously developed land. The removal of these structures could provide some visual benefit and would make use of land that has historically accommodated built development. However, national and local policy do not provide automatic support for residential redevelopment of previously developed land where such redevelopment would conflict with the overarching spatial strategy or result in unjustified residential encroachment into the countryside. The previously developed nature of the site does not therefore outweigh the fundamental policy conflict arising from the introduction of a new residential use in this location.

- 7.6 The appellant contends that the site forms part of a broader settlement grouping and should be regarded as infill or a logical extension to nearby development. However, as identified within the Officer's Report, the surrounding pattern of development along Rock Road is loose, sporadic and interspersed with open land and vegetation. The site does not form part of a cohesive or continuous built-up frontage and instead reads as part of the transitional countryside edge. The proposal would therefore result in the incremental extension of residential use into the countryside, contributing to piecemeal development that would undermine the established settlement pattern and the distinction between settlement and countryside.
- 7.7 National policy similarly supports the Council's position. Paragraph 84 of the National Planning Policy Framework (2024) advises that isolated homes in the countryside should be avoided unless one or more specific circumstances apply, such as an essential rural worker need, the optimal viable use of a heritage asset, the re-use of redundant buildings, subdivision of an existing dwelling, or exceptional quality design. None of these exceptions apply in this case. The proposal would instead establish a new market dwelling in the countryside without sufficient justification and contrary to the objectives of national policy.
- 7.8 The Council is mindful that the current absence of a five-year housing land supply engages the presumption in favour of sustainable development under paragraph 11(d) of the Framework. However, this does not displace the need to assess whether the proposed land use is appropriate in principle having regard to the Development Plan and the characteristics of the site. The Council considers that the limited benefit arising from the provision of a single dwelling would not significantly and demonstrably outweigh the conflict with the Development Plan's spatial strategy and countryside protection policies.
- 7.9 For these reasons, the Council concludes that the proposed residential use is not acceptable in principle in this location. The proposal conflicts with Policies 2, 3, 4 and 26 of the Horsham District Planning Framework (2015), together with Policies 1 and 8 of the Storrington, Sullington and Washington Neighbourhood Plan (2019), and this conflict attracts substantial weight in the determination of the appeal.

8.0 Main Issue 3: Amount of development

- 8.1 The third main issue is whether the amount of development proposed, namely the erection of 1no. dwelling, is appropriate having regard to the Development Plan and the Permission in Principle (PiP) regime. Whilst the proposal is limited in scale and represents a reduction from the previously refused scheme for up to four dwellings, the Officer's Report makes clear that the acceptability of the amount of development cannot be considered separately from the site's countryside location and the wider spatial strategy. The Development Plan seeks to carefully manage the distribution of housing growth across the District, and even modest proposals can result in material harm where they would undermine that strategy.
- 8.2 The appeal site lies outside any defined Built-Up Area Boundary and does not form part of a planned or coherent extension to the settlement. Whilst the surrounding area

contains some residential properties, development along Rock Road is characterised by a dispersed and sporadic pattern interspersed with open land, mature vegetation and agricultural uses. The Officer's Report identifies that the site presently forms part of the transitional countryside edge rather than a contained or consolidated residential environment. The introduction of a new dwelling in this location would therefore contribute to incremental residential encroachment into the countryside.

- 8.3 The Council acknowledges that the current proposal differs materially from the previously refused scheme for up to four dwellings and would not result in the same degree of suburbanisation or intensity of development previously identified. Nevertheless, the proposal would still establish a new permanent residential planning unit on a site where housing development is not supported in principle. The amount of development proposed is therefore not neutral in policy terms and must be assessed in the context of the site's relationship to the settlement pattern and the objectives of the Development Plan.
- 8.4 The Officer's Report further identifies that the existing nursery structures, whilst substantial, are associated with a former commercial horticultural use and do not establish a residential character to the site. Their removal and replacement with a dwelling would therefore represent a material change in the nature and function of the land rather than a simple replacement of built form. The existence of previously developed land does not in itself justify the introduction of a residential use or render the amount of development acceptable.
- 8.5 Furthermore, the grant of Permission in Principle would establish the acceptability of residential development on the site in principle, with only detailed matters reserved for subsequent consideration. Whilst each future proposal would require assessment on its own merits, the Council considers that permitting even a single dwelling in this location would weaken the clear distinction between the settlement boundary and the surrounding countryside and could cumulatively undermine the plan-led approach to the distribution of development.
- 8.6 The Council is mindful that the contribution of one dwelling to housing supply attracts some weight in favour of the proposal, particularly in the context of the Council's current five-year housing land supply position. However, the benefits arising from a single dwelling are necessarily modest and are not considered sufficient to outweigh the identified conflict with the Development Plan spatial strategy and countryside protection policies.
- 8.7 For these reasons, the Council concludes that the amount of development proposed, whilst limited, remains inappropriate in this countryside location and contributes to the overall conflict with Policies 2, 3, 4 and 26 of the Horsham District Planning Framework (2015), together with Policies 1 and 8 of the Storrington, Sullington and Washington Neighbourhood Plan (2019).

9.0 Main Issue 4: Material Considerations

- 9.1 The fourth main issue concerns the weight to be afforded to a number of material considerations raised by the appellant, namely the Council's housing land supply position and Housing Delivery Test (HDT) performance, Previously Developed Land; and Distinction from Cited Appeal Decisions

Housing Land Supply Position

- 9.2 However, the Framework does not disapply the Development Plan, nor does it create an automatic presumption in favour of residential development in all countryside locations. The statutory requirement under Section 38(6) of the Planning and Compulsory Purchase Act 2004 remains that applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Council therefore maintains that the spatial strategy contained within Policies 2, 3, 4 and 26 of the Horsham District Planning Framework ("HDPF") continues to attract material weight notwithstanding the current housing land supply position.
- 9.3 The Officer's Report recognises that the delivery of a single dwelling would make a modest contribution towards the District's housing supply and that this attracts weight in favour of the proposal. Economic benefits associated with the construction phase and future expenditure from occupiers are similarly acknowledged. However, given the limited scale of the proposal, these benefits are necessarily modest.
- 9.4 The Council considers that the appellant places undue reliance upon the tilted balance as a mechanism to override the Development Plan spatial strategy. The purpose of paragraph 11(d) is not to render all countryside housing proposals acceptable, but rather to require a balanced assessment of whether adverse impacts would significantly and demonstrably outweigh the benefits. In this instance, the Council considers that the proposal would undermine the plan-led approach to the distribution of development by introducing an unsupported residential use into the countryside, contrary to the overarching objectives of the Development Plan. This harm attracts substantial weight.

Previously Developed Land

- 9.5 The Council accepts that the appeal site comprises previously developed land and that the existing glasshouse structures and associated nursery buildings are substantial in scale. The site therefore possesses a developed character to a degree, and the removal of the dilapidated structures could result in some visual improvement to the site. These matters weigh moderately in favour of the proposal.
- 9.6 Nevertheless, neither national nor local policy provides automatic support for residential redevelopment of previously developed land irrespective of location. Paragraph 125(c) of the Framework encourages the effective use of land, including previously developed land, but this objective must be considered alongside the Framework's wider objectives relating to sustainable patterns of development and the protection of the countryside.

- 9.7 The Council further notes that the existing built form is associated with a former commercial horticultural use rather than residential occupation. The proposal would therefore not simply rationalise or replace existing development but would instead introduce a permanent residential planning unit into the countryside. The previously developed nature of the site does not therefore outweigh the fundamental conflict with the Development Plan spatial strategy.

Distinction from Cited Appeal Decisions

- 9.8 The appellant relies upon a number of recent appeal decisions within the District in support of the proposal. The Council acknowledges that some appeal decisions have afforded reduced weight to countryside protection policies in circumstances where the tilted balance has been engaged. However, appeal decisions are highly fact-specific and must be considered within the context of their own site characteristics, locational circumstances and planning judgments.
- 9.9 The Council does not dispute that certain similarities exist between the appeal proposal and the cases cited by the appellant, particularly in relation to the Council's housing land supply position and the reuse of previously developed land. However, the cited appeals do not establish a general principle that residential development outside defined settlement boundaries should automatically be regarded as sustainable or acceptable in principle.
- 9.10 In the present case, the Council considers that the appeal site remains physically and functionally separate from the defined settlement, does not form part of a cohesive settlement edge, and would contribute to incremental residential encroachment into the countryside. The surrounding pattern of development along Rock Road remains loose and sporadic rather than consolidated or urban in character. The Council therefore considers that the appeal proposal is materially distinguishable from cases where Inspectors have concluded that sites were sufficiently related to existing settlements to justify development despite policy conflict.
- 9.11 Furthermore, several of the appeal decisions relied upon by the appellant related to full or outline applications where detailed considerations regarding layout, landscaping and integration with surrounding development were available for assessment. By contrast, the current appeal relates to Permission in Principle only, where the Inspector is required to consider whether the principle of residential development, in terms of location, land use and amount, is acceptable in its own right.
- 9.12 Accordingly, whilst the Council has had regard to the appeal decisions cited by the appellant, it does not consider that they outweigh the site-specific concerns identified in this case or justify a departure from the Development Plan spatial strategy.
- 9.13 Drawing these matters together, whilst the material considerations advanced by the appellant are acknowledged and carry some weight—particularly in respect of housing land supply—they do not outweigh the identified harm arising from the proposal's conflict with the Development Plan spatial strategy and its unsustainable location.

10.0 Main Issue 5: Sustainable Development

- 10.1 The fifth main issue is whether, taken as a whole, the proposal represents sustainable development when assessed against the National Planning Policy Framework (“the Framework”), including the application of the presumption in favour of sustainable development. The Council acknowledges that it cannot currently demonstrate a five-year supply of deliverable housing sites and that the tilted balance within paragraph 11(d) of the Framework is therefore engaged. In such circumstances, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole.
- 10.2 The Council recognises that the proposal would provide certain benefits. The appeal scheme would deliver 1 no. dwelling which would make a modest contribution towards the District’s housing supply at a time of identified shortfall. The proposal would also generate limited economic benefits associated with construction activity and future expenditure from occupiers. Furthermore, the site comprises previously developed land containing substantial former nursery structures and glasshouses, and the removal of these dilapidated buildings could provide some visual improvement to the site. These matters weigh in favour of the proposal.
- 10.3 However, as identified throughout the Officer’s Report and the preceding main issues, the proposal would conflict with the Development Plan spatial strategy by introducing a new residential use within the countryside on land outside any defined Built-Up Area Boundary and not allocated for housing development. Whilst the site lies relatively close to Storrington, it does not form part of a cohesive or continuous settlement edge and instead remains physically and functionally separate from the built-up area. The proposal would therefore contribute to incremental residential encroachment into the countryside in a manner contrary to the plan-led approach to development.
- 10.4 The Council further considers that, notwithstanding the modest scale of the proposal, the appeal scheme would undermine the objectives of Policies 2, 3, 4 and 26 of the Horsham District Planning Framework (“HDPF”), which collectively seek to direct housing growth towards sustainable settlements and resist unjustified residential development in the countryside. The proposal would establish a new residential planning unit in a location where such development is not supported in principle and where future occupiers would remain reliant to a significant degree upon private vehicle use for day-to-day activities.
- 10.5 The Council acknowledges that the appeal site contains existing built form and that the proposal would not result in the same degree of suburbanisation or intensity of development associated with the previously refused scheme for up to four dwellings. Nevertheless, the fundamental policy conflict remains unchanged. The previously developed nature of the site and the modest benefits arising from the delivery of a single dwelling are not considered sufficient to outweigh the harm arising from conflict with the Development Plan spatial strategy and the erosion of the distinction between settlement and countryside.

- 10.6 The Council therefore concludes that, when assessed against the policies of the Framework as a whole, the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits of the proposal. In particular, the proposal would fail to achieve the social and environmental objectives of sustainable development by undermining the plan-led distribution of growth and introducing unjustified residential development into the countryside.
- 10.7 Accordingly, whilst the presumption in favour of sustainable development is engaged, the Council considers that it does not indicate that planning permission should be granted in this instance. The conflict with the Development Plan and the identified harms lead to the clear conclusion that the appeal should be dismissed.

11.0 Planning Balance & Overall Conclusion

- 11.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning decisions be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 11.2 The Council acknowledges that the current absence of a five-year supply of deliverable housing sites engages the presumption in favour of sustainable development under paragraph 11(d) of the National Planning Policy Framework (“the Framework”). The Council also recognises that the proposal would provide some benefits, including the delivery of 1 no. dwelling, limited economic activity associated with construction, and the redevelopment of previously developed land containing substantial former nursery structures. The removal of the existing dilapidated glasshouses would also provide a degree of visual improvement to the site. Collectively, these matters weigh in favour of the proposal.
- 11.3 However, the benefits identified are limited in scale and must be balanced against the adverse impacts arising from the proposal. The appeal scheme would introduce a new residential use within the countryside on a site outside any defined Built-Up Area Boundary and not allocated for development within either the Horsham District Planning Framework (“HDPF”) or the Storrington, Sullington and Washington Neighbourhood Plan. The proposal would therefore conflict with the Development Plan spatial strategy, which seeks to direct growth towards sustainable settlements and resist sporadic residential encroachment into the countryside.
- 11.4 Whilst the site contains substantial existing built form and lies relatively close to Storrington, the Council considers that the site remains physically and functionally separate from the settlement and does not form part of a coherent or continuous settlement edge. The proposal would therefore extend residential development into a countryside location in a manner that would undermine the plan-led approach to the distribution of housing growth.
- 11.5 The Council has had regard to the appellant’s submissions regarding the tilted balance, the previously developed nature of the site, and the appeal decisions cited in support of the proposal. These matters attract weight as material considerations. Nevertheless,

the Council does not consider that they outweigh the identified conflict with the Development Plan or demonstrate that the site represents a suitable and sustainable location for residential development.

- 11.6 The Council further notes that this appeal relates to Permission in Principle only, where the Inspector is required to consider the acceptability of the proposal in terms of location, land use and amount of development. The Council's concerns arise fundamentally from the principle of introducing a new residential planning unit in this countryside location and are not matters capable of resolution through subsequent Technical Details Consent.
- 11.7 Drawing these matters together, the Council concludes that the adverse impacts arising from the proposal would significantly and demonstrably outweigh the limited benefits when assessed against the policies of the Framework as a whole. The proposal would therefore fail to constitute sustainable development.
- 11.8 Accordingly, the appeal proposal conflicts with the Development Plan taken as a whole, and there are no material considerations which indicate that planning permission should be granted. The Council therefore respectfully requests that the appeal be dismissed.

Yours sincerely,

Daniel Holmes
Senior Planning Officer