BRETT INCORPORATED
PLANNING AND DEVELOPMENT SERVICES
LIMITED

16 October 2024

LPA Ref.: DC/24/0454

BIL Ref.: 1861.8

PINS Ref.: APP/Z3825/W/24/3347929

Dear Mr Ernsting.

Town and Country Planning Act 1990

Appeal by Mr Joe Ray

Site Address: Hurston Lane Depot, Hurston Lane, Storrington, Pulborough, West Sussex, RH20 4AF

1. I refer to the LPA's appeal case dated 10 October 2024 along with recommended conditions in the event the appeal is allowed and have the following comments to make thereon.

2. This second appeal is running parallel with the first appeal being considered under APP/Z3825/W/24/33452928 in addressing highway and water neutrality refusal reasons, the former of which was satisfactorily addressed at the determination stage of the second appeal leaving water neutrality matters contested. Both appeals raise the issue of water neutrality through associated refusal reasons and it is fair to say the essence of the LPA's appeal stance to water consumption appears to be entirely consistent between the two cases.

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Both cases maintain a baseline consumption rate of zero (0) in connection with the existing use of the premises, which the LPA maintains is unlawful.

3. The LPA's repeated refusal reason and appeal case etc regarding water neutrality for both appeals remain the same. The sole refusal reason regarding this second appeal has therefore already been addressed in the appellant's two submission appeal statements, the appellant's response of 01 August 2024 to the LPA's case regarding the first appeal as well as the applications and associated response to the LPA's rebuttal case to the two costs applications.

4. In the interests of brevity, all that appellant's case already made in connection with water neutrality should be applied equally to the LPA's response rather than being repeated again.

5. At first sight, it appears the LPA's recommended conditions for the second appeal are the same as those promoted in connection with the first appeal. On this basis, the lengthy comments about those conditions, made under the heading 'Proposed Conditions' commencing on page 3 of the appellant's response of 01 August 2024 in connection with the first appeal should be applied in equal measure to this second appeal.

Yours sincerely,



Simon Brett