

MME PLANNING SERVICES

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

Supplementary Statement in Response to the National
Planning Policy Framework 2026

Ref: P-064

August 2026

Version 1

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MME Planning Services

1. Introduction

- 1.1 This supplementary statement is submitted in response to the invitation from the Planning Inspectorate for comments concerning the publication of the revised National Planning Policy Framework (“NPPF”), published on 17 August 2026.
- 1.2 The Appellant contends that the revised NPPF is a material consideration of particular relevance to this appeal. Most significantly, the revised Framework introduces a substantially clearer national policy position concerning certain forms of development outside settlements under Policy S5.
- 1.3 The Appellant recognises that the development plan remains an important consideration and that the statutory starting point is the development plan unless material considerations indicate otherwise.
- 1.4 However, given that the local plan policies are now out-of-date, the publication of the revised NPPF is a significant material change in national planning policy. The Inspector is therefore respectfully invited to determine the appeal having regard to the 2026 Framework rather than the superseded version of the NPPF and the out-of-date local plan policies.

2. Relevant Planning Policy Considerations – NPPF 2026

Policy S5 – Principle of development outside settlements

- 2.1 As detailed above, the most significant change for this appeal is NPPF Policy S5. This new policy states that only certain forms of development should be approved outside settlements. It then expressly identifies a number of categories, including S5(1)(e), which relates to: “Limited infilling within groups of houses”.
- 2.2 Importantly, Policy S5 does not merely identify limited infilling as a form of development which may be permitted in exceptional circumstances. Policy S5 identifies limited infilling within groups of houses as a form of development which should be approved unless the benefits would be substantially outweighed by adverse effects when assessed against the relevant national decision-making policies.

- 2.3 This represents a materially different policy framework from one in which the sole consideration is whether a site lies outside a defined settlement boundary. As clearly demonstrated by Figure 1 below, the appeal site is physically located within an established group of houses, with existing dwellings located on all sides.

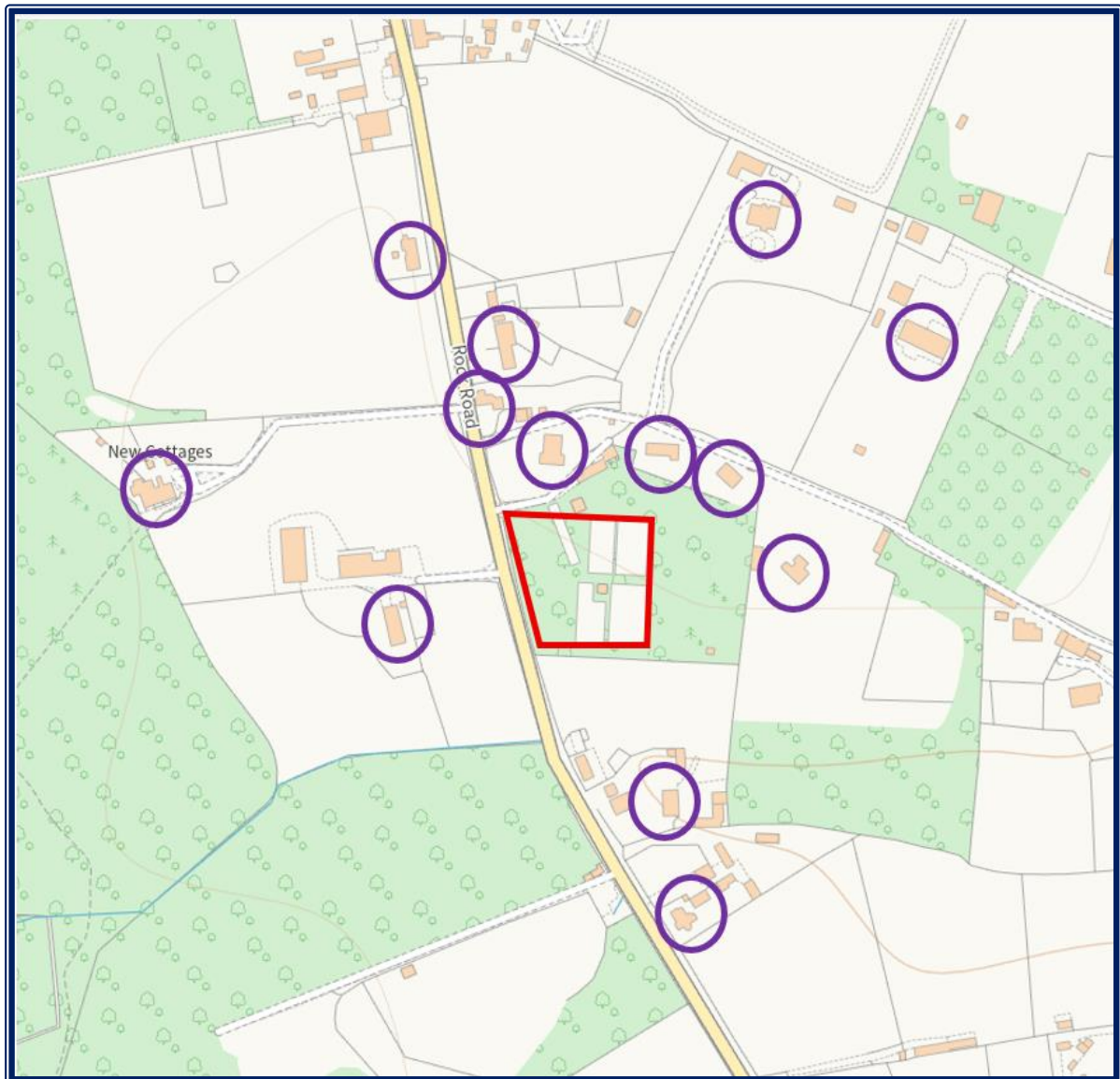


Figure 1: Plan showing the site (Red Outline) with existing houses located on all sides (Purple Circles)

- 2.4 The appeal proposal would result in the limited infilling within a group of houses. The appeal site is located within an established pattern of residential development along Rock Road. The surrounding development provides the physical context within which the appeal site should properly be assessed.

- 2.5 The Appellant is of the view that the site represents a gap within this established group of houses and that the proposed dwelling would occupy that gap, rather than extend residential development into an otherwise open and undeveloped part of the countryside. Indeed, it is also highlighted that the site also contains existing glasshouse structures, further distinguishing the appeal proposal from development of an entirely undeveloped, greenfield location.
- 2.6 A dwelling which lies beyond and detached from any established group of houses would be considered as isolated development in the countryside. The revised NPPF continues to restrict such development through Policy S5(3) and Policy HO11. The proposal should instead be understood in the context of the existing built form along Rock Road. It would provide one dwelling within an established residential group rather than creating a new isolated dwelling, separated from existing residential development.
- 2.7 The revised Framework therefore recognises that there can be locations outside formal settlements where the existing pattern of houses is sufficiently established for limited infilling to represent an appropriate form of development. The proposal is limited to one dwelling and would occupy an existing developed location within a cluster of dwellings. Its scale and relationship with the surrounding built form are consistent with the policy provision of limited infilling and would not result in an extension of built form into open countryside. The appeal proposal would make efficient use of a small site within an existing pattern of development.
- 2.8 As such, the Appellant respectfully submits that the proposal falls within the specific category identified in Policy S5(1)(e).

Policy HO7 – Meeting the need for homes

- 2.9 In addition to the specific support provided by Policy S5(1)(e), the proposal benefits from the Framework's wider support for housing delivery. Policy HO7 states that: "In applying the policies in this Framework, substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence. This includes, but is not limited to, homes needed for different groups assessed under policy HO1".

- 2.10 As set out within the appeal documents, the Council is currently unable to demonstrate a 5-year housing land supply, with the latest Authority Monitoring Report (December 2025) detailing a supply of only 1.7 years. In addition, the Council has failed its most recent Housing Delivery Test, with the December 2024 test results demonstrating that the Council has only delivered 62% of its housing target in the preceding three years.
- 2.11 The appeal proposal would therefore make a tangible contribution towards meeting the housing needs of the District. The proposal is for a single dwelling and, as identified within the appeal documentation, is intended to provide a modest form of residential accommodation consistent with the identified local need for smaller homes, as set out within the Storrington, Sullington & Washington Neighbourhood Plan (2019). Furthermore, the proposal is considered to be in keeping with the character of the area and limits the impact on the setting.
- 2.12 The Appellant accepts that one dwelling cannot, in itself, resolve strategic housing requirements. Notwithstanding this position, Policy HO7 expressly requires substantial weight to be given to the benefits of individual housing proposals which contribute towards identified accommodation needs.
- 2.13 As detailed above, the proposal qualifies as limited infilling, irrespective of the housing land supply position; the significant housing shortfall provides an additional material consideration which increases the weight to be given to its delivery.

3. Summary and Conclusion

- 3.1 Overall, in applying the revised NPPF, the Appellant submits that the planning balance falls in favour of the proposal. The principal benefits are:
- the provision of one additional dwelling;
 - the substantial weight which Policy HO7 requires to be given to the provision of homes contributing towards identified accommodation needs;
 - the efficient use of an existing developed site;
 - the limited scale of the proposal; and
 - significantly, the proposal's conformity with the specific category of development identified in Policy S5(1)(e), namely limited infilling within groups of houses.

- 3.2 Furthermore, Policy S5 sets a clear policy test: the benefits of development within the identified categories should be substantially outweighed by adverse effects before approval is withheld. The Appellant contends that this high threshold is not met in this case. In particular, the appeal proposal's location within an established group of houses, its limited scale and its occupation of an existing gap mean that it represents the form of development which Policy S5(1)(e) identifies as appropriate outside settlements.
- 3.3 The Appellant recognises that the appeal site lies outside the defined settlement boundary. However, the revised NPPF now expressly provides national policy support for limited infilling within groups of houses outside settlements. The fact that the site lies outside the settlement boundary should therefore not, of itself, be determinative. The Inspector is therefore, respectfully requested to give substantial weight to the new national policy position and to determine the appeal accordingly.
- 3.4 For the reasons set out above, the Appellant considers that the proposal accords with the relevant provisions of the 2026 NPPF and that planning permission should be granted.