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FAO Tracey Annear
The Planning Inspectorate
Temple Quay House
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NJA Ref: 22/152

12 January 2026

FINAL COMMENTS

Dear Tracey Annear

PINS Ref: **APP/Z3825/W/25/3375774**
Appellant: **Mr J Chadwick**
Site: **Cadrona, Hampers Lane, Storrington, RH20 3EX**

Thank you for your letter dated 06 January 2026. Please find attached the Appellant's final comments in response to the Council's Statement of Case, noting that no third-party comments have been sent.

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/25/3375774**

Appellants: Mr J Chadwick

Site: Cadrona, Hampers Lane, Storrington, RH20 3EX

APPELLANT'S FINAL COMMENTS

1.0 Horsham District Council's Statement of Case

1.1 The Council refer to its delegated report which has been examined in detail within the Appellant's Statement of Case.

1.2 The Council confirms that it cannot demonstrate a five year supply of deliverable housing land and as a result, it is reiterated that the tilted balance of NPPF paragraph 11 d) is engaged and the proposal must be considered against the presumption in favour of sustainable development. The Appellant's Statement of Case sets out the reasons why, when assessed against the policies of the NPPF taken as a whole, there are no adverse impacts of granting planning permission that would significantly and demonstrably outweigh the benefits of the provision of a new home, in a sustainable location, of a high quality design and which makes effective use of land.

1.3 Since the submission of the appeal, the Council has published an updated AMR for 2024/25 (19 December 2025) which confirms that the Council is still unable to demonstrate a five year housing land supply.

1.4 The Council's concerns regarding the alleged erosion of green infrastructure and urbanisation of the site are not supported when the proposal is assessed against the detailed arboricultural evidence submitted with the appeal. The removal of trees since the previous appeal was not arbitrary but followed professional arboricultural advice and directly reflected concerns previously raised by the Council's own Tree Officer about the unsuitability and long-term sustainability of retaining tall conifers and other poorly formed trees in close proximity to a new dwelling.

Many of the removed trees were categorised as low quality or unsafe (Categories C or U), including Douglas firs affected by confirmed basal decay from *Phaeolus schweinitzii*, presenting a clear health and safety risk. Smaller trees and shrubs removed had no meaningful wider amenity value and were readily capable of

replacement. The suggestion that lawful, justified removals equate to an unacceptable cumulative loss of green infrastructure fails to recognise both the condition and limited contribution of those trees, and the robust compensatory planting proposed as part of the scheme.

1.5 Concerns regarding undue pressure on the retained sycamore (T17) and oak (T20), including alleged deficiencies in Root Protection Area analysis, are similarly unfounded. The residential layout has been designed in around the identified arboricultural constraints in accordance with BS5837:2012, with RPAs accurately plotted using sound arboricultural judgement, including polygonal RPAs where appropriate to reflect likely root distribution taking into account the proximity of the adjacent public highway. The proposed new dwelling is located approximately 9 metres from T17 and some 31 metres from T20, distances that are neither unusual nor inherently harmful in a residential context, particularly within a generous garden of approximately 0.4 acres.

1.6 Tree protection measures, no-dig construction where required, and arboricultural supervision can be secured by condition and will safeguard retained trees during construction. The recent making of a TPO does not in itself demonstrate incompatibility between the development and tree retention; rather, it reinforces the ability of the Local Planning Authority to manage trees post-development. When considered alongside the proposed replacement planting and increased species diversity, the development would not result in unacceptable harm to landscape character or amenity and would not place undue pressure on retained trees, fully addressing the Council's stated objections under Policies 25, 31, and 33.

2.0 Conditions

2.1 The Appellant raises no objections to the Council's suggested conditions.

For the reasons outlined above and in the Appellants' Statement of Case, it is respectfully requested that the appeal be allowed.