

Planning Inspectorate
c/o David Robinson

Our ref: DC/26/0274

Date 28th August 2026

Dear Mr. D Robinson,

**Our ref: DC/26/0274,
Address: Hole Barn Farm, Brighton Road, Henfield,
Proposal: Single storey infill extension and conversion of garage into annexe
accommodation including 1 no. bedroom, lounge, kitchen and bathroom.**

In respect to the above proposal, LPA highlights the key policies within the new NPPF 2026 that are relevant to the proposed development.

Design and Appearance:

The revised NPPF has relevance to the above case file. The key policies which are material consideration to the proposed development are as follows, Policy DP3(1) of the NPPF 2026. This policy seeks to ensure that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets.

Furthermore, Policy DP3(2) sets out the criteria of assessment on the key principles for well-designed places where subsection (e) states that built Form: use the pattern of buildings to define the arrangement of streets, squares and other spaces, promote compact forms of development to optimise the site's potential, distinguish between public and private areas, create focal points and, where appropriate, enhance views into and out of the scheme;

Additionally, DP3(3) reinforces the fact that development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2, or with any explicit design standards set out in the development plan (including those in locally specific policies, guides, codes or masterplans). Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.

The above requirements are discussed within 'Principle / Character and Appearance' section of the Officer Report which states that 'enclosing the existing courtyard and linking the two separate outbuildings which would create a substantially large outbuilding, which would be disproportionate to the size of the dwelling it serves. Furthermore, the resultant outbuilding would be fully equipped with a living area, kitchen, snug, WC and 1 no. en-suite bedroom. It is viewed that the level of internal facilities proposed within the structure would be capable of independent self-contained accommodation, with no dependency on the facilities within the main dwelling. Therefore, it is judged that resultant outbuilding would not serve as an ancillary accommodation to the main dwelling.

As a matter of fact and degree, it is considered that the proposal, by reason of its scale, size and design is tantamount to the creation of a new and separate dwelling. As such the development would amount to negative impacts on the character of the area and the

residential amenity of the neighbouring properties'

The application site is situated outside of the defined built-up area and positioned within the countryside location therefore, the following policies of the new NPPF 2026 would also be relevant to the proposal:

Policy S5 of the NPPF 2026 aims to maintain that only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:

- a. Development for: agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction and processing; engineering operations and infrastructure (including for transport, energy, water and telecommunications); roadside facilities in accordance with policy TR5; national defence and security; or which is solely for nature conservation, restoration and/or enhancement;
- b. Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary;
- c. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces;
- d. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);
- e. Limited infilling within groups of houses;
- f. An exception site as provided for in policy HO10, or development brought forward under a Community Right to Build Order or Neighbourhood Development Order;
- g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation, provided it meets the criteria in policy HO12;
- h. Residential and mixed-use development which would:
 - i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
 - ii. Be physically well-related to the station or the settlement within which the station is located;
 - iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and
 - iv. Not prejudice any proposals for long-term comprehensive development in the same location.
- i. The development of land allocated for that purpose in the development plan (where this lies outside settlements); and
- j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test²⁷), and where the development would:
 - i. Be physically well-related to an existing settlement²⁸ (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or
 - ii. Comprise major development for freight and logistics purposes which accords with policy E3.

The LPA considers the proposal not to be physically well-related to an existing settlement. Additionally, Policy HO11 of NPPF 2026 seeks to ensure that development proposals for isolated homes in the countryside should only be supported where one or more of the following circumstances apply:

- a. There is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;

- b. The development would be appropriate enabling development to secure the future of heritage assets in accordance with policy HE4;
- c. The development would reuse a redundant or disused building and enhance its immediate setting, including proposals which would secure the long-term reuse of a vacant or underused listed building (subject to taking into account any harm to its significance, as set out in policy HE6);
- d. The development would involve the subdivision of an existing residential building; or
- e. The design is of exceptional quality, in that it:
 - i. Is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - ii. Would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

The above matters are discussed within 'Principle / Character and Appearance' and 'Impact on Neighbouring Amenity' sections of the Officer Report, which states that 'the application, as proposed, does not fall within any of the categories of development ...needs ...for countryside location... The proposed annexe could easily be occupied as a separate unit of accommodation independent of the main dwellinghouse, and the plot subdivided to create a separate garden area for use by occupiers of the unit. The occupation of the unit as such would be tantamount to the creation of a dwelling and would isolated from nearby settlements and with future occupiers dependent upon the use of private vehicles to access everyday services and facilities. As the proposed development is located outside of the defined built-up area of a settlement, on a site not allocated within the Development Plan or within a made Neighbourhood Plan, and not essential to the countryside location, it would therefore be contrary to the overarching spatial strategy and hierarchy approach of concentrating development within the main settlements, and would not be essential to its countryside location.'

'Due to the scale and design of the development, the proposal could be constructed and used as a separate dwelling unit, thereby having negative impacts on the character of the area and the residential amenity of the neighbouring properties. Therefore, it is viewed that the proposal would likely to negatively impact the amenities of the surrounding neighbours.'

The revised NPPF 2026 reinforces the concerns raised with respect to the proposed extension to and conversion of the outbuilding to an annexe which would be able to 'function as a separate and independent dwelling unit and would be tantamount to the creation of a new dwelling in a countryside location. The dwelling is located outside of any defined built-up area, on a site not allocated within the Development Plan or within a made Neighbourhood Plan and it has not been demonstrated that it is essential to its countryside location. The self-contained unit of accommodation would be contrary to the overarching spatial strategy and hierarchy approach of concentrating development within the main settlements and would create a reliance on private vehicles for access to everyday services and facilities. The development is therefore contrary to Policies 2, 3 and 26 of the Horsham District Planning Framework (2015)' and moreover Policies DP3, S5 and HO11 of the revised NPPF 2026.

Water Neutrality:

Regarding water neutrality, the officer report makes reference to paragraph 193 of the NPPF 2024. This is now superseded by policy N6 of the revised NPPF 2026, which aims to ensure that development proposal support the conservation of important habitats, species and sites of geodiversity value.

I hope the above information is of assistance to you.

Yours sincerely

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