

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Ref: 119/2026
Date: 20 May 2026

Dear Sir or Madam,

Planning Inspectorate Reference: 6007274

Horsham District Council Reference: DC/26/0029

Site Address: Gaydon, Kennel Lane, West Grinstead, RH13 8LX

This letter is submitted on behalf of the Appellant in response to the Council's written submission dated 28 April 2026.

The Council's appeal statement largely reiterates the original reasons for refusal and does not materially undermine the arguments advanced within the WPS Planning Appeal Statement of Case.

In relation to Refusal Reason 1, the Council seeks to distinguish the Marlpost Meadows appeal decision (APP/Z3825/W/22/3303603) by arguing that the site in that case was closer to a defined settlement and benefited from greater accessibility by non-car transport modes. The Council contends that the appeal site at Gaydon is approximately two miles from Cowfold and is therefore primarily car dependent. On that basis, the Council maintains that the proposal conflicts with the HDPF spatial strategy and countryside protection policies.

However, the Council's response does not directly address the principal argument advanced by the Appellant, namely that the Council cannot demonstrate a five-year housing land supply and that paragraph 11(d) of the National Planning Policy Framework

is therefore engaged. The Council does not dispute that the relevant spatial policies are out-of-date, nor does it explain why the adverse impacts of the proposal would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

The Council also fails to rebut the Appellant's position that the proposal represents the re-use of an existing building within an established residential planning unit, rather than isolated encroachment into undeveloped countryside. Likewise, the Council does not dispute the absence of technical objections from highways, ecology or other consultees.

With regard to Refusal Reason 2, the Council argues that the conversion of the building into a separate dwelling would create a "new relationship" between the proposed dwelling and the existing house because they would operate as independent residential units in close proximity. The Council also contends that, whilst some intervisibility between dwellings is typical of residential environments, the proposed arrangement is not reflective of the prevailing settlement pattern characterised by larger detached dwellings with substantial curtilage.

However, importantly, the Council expressly acknowledges within its statement that the proposed dwelling "cannot be described as dominating the space or creating an oppressive environment". This significantly weakens the original refusal reason relating to alleged overbearing impact.

The Council's concerns therefore appear limited to the effect of the existing dwelling on future occupiers of the proposed dwelling. However, the Appellant maintains that the degree of intervisibility and proximity proposed is entirely typical of many residential environments and would not result in unacceptable living conditions. The Council has not provided any objective evidence demonstrating unacceptable levels of overlooking, enclosure or loss of amenity.

Overall, the Council's submission primarily seeks to:

- distinguish the Marlpost Meadows appeal decision;
- reinforce reliance on countryside protection policies despite the acknowledged housing land supply deficit;
- argue that the relationship between the dwellings would create a poor-quality living environment; and
- challenge the Appellant's position that the amenity impacts are acceptable within a residential context.

Nevertheless, the Council's statement largely repeats the original refusal reasons and does not substantively rebut the wider planning balance arguments advanced in the WPS Appeal Statement of Case.

For these reasons, the Appellant respectfully maintains that the proposal represents sustainable development when assessed against the National Planning Policy Framework as a whole and requests that the appeal be allowed.

Your faithfully



Doug Wright

WPS Planning