S E T P L A N

town & environmental planners

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Date: 31 December 2025
Our Ref: STE25/01
PINS Ref: APP/Z3825/W/25/3375491

Jacky Parsons
3C, Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms. Parsons,

Re: PINSs Ref. APP/Z3825/W/25/3375491
Site at 32 High Street, Steyning, West Sussex, BN44 3YE
Town and Country Planning Act 1990 (As Amended)

Thank you for the opportunity to comment on the points made in Horsham DCs letter of 11 December 2025 date and, notably, the letter (dated 1/12/25) of support for the appeal proposal from the Steward of Steyning Museum who lives nearby at No. 3 Bank Passage. This letter confirms that, from the Museum's collection of old photographs of the appeal property, "it was built and used as a house and not for commercial or business use. It turned into a shop in later years." The letter goes on to confirm that, "There are empty shops already on the High Street so there is not a shortage of buildings| premises for commercial use".

Regarding the HDCs letter, Paragraph 4 asserts that "the marketing information submitted is limited and does not provide the detailed evidence necessary to demonstrate that the premises have been fully and reasonably exposed to the commercial market. No comprehensive marketing schedule has been provided". The foregoing is refuted by the evidence produced in Appendix 2 to my Appeal Statement which includes a letter from marketing agents Hamilton Graham detailing the marketing campaign. HDC also fails to account for the role of financial incentives, as in this case, the significant holding costs resulting from business rates and ongoing standard utility

levies, motivating the expeditious lease or sale of the commercial component of the Appeal Site.

HDC goes on to assert that “Much of the material focuses on the former tearoom use rather than alternative commercial activities”. This is simply not the case. The viability of the former tea-room use was raised only in my Application supporting Statement. The marketing campaign sales brochure describes the property only as a “Double-Fronted Retail Space” (i.e. available to the full range of Class E commercial, business, and service uses) with no mention made of its former Class E(b) use. The complete lack of interest shown by other Class E uses and the 2022 closure of the former tearoom use (followed by the tenants relocation to centrally located premises on the High Street) provides incontrovertible evidence of the financial unviability of Class E use at this peripheral location.

In Paragraph 5 of their letter HDC doubles down on the logical fallacy underpinning their case with several incorrect assertions unsupported by facts on the ground. Their theory seems to be that the designated Primary Retail Frontage overrides the actual use and location of individual High Street properties. The starting point of town and country planning is that each and every property is unique with a monopoly on it’s particular location. For example their letter alleges that; “The appellant’s assertion that adjacent uses are predominantly residential is not supported by the adopted frontage designation”. My Appeal Statement makes no such assertion, only that No. 34 High Street, the residential use adjoining the Appeal Site, and washed over by the designated Primary Retail Frontage, separates the Appeal site from the the Primary Retail Frontage. I have attached to this letter, for convenience, my plan marked 1, as produced in in Appendix 1 appended to my Appeal Statement, showing the Appeal Site in relation to the Primary Retail Frontage, the adjoining residential use at No. 34 and Bank Passage

extending between Nos. 34 and 36 High Street. The logical or natural termination for the Primary Retail Frontage should be at No. 38 High Street on the far side of Bank Passage and the Appeal Site's inclusion is contrived.

HDCs letter goes on to assert that "The introduction of a residential frontage at this point would disrupt the continuity of commercial activity and undermine the role of this frontage in supporting the wider centre." The Appeal Site terminates the Primary Retail Frontage, from which it is separated as described in the foregoing, and does not form part of an uninterrupted succession of retail uses which the word "continuity" implies. The Appeal Site's peripheral location means its role in supporting the wider centre is at best marginal. The core of Steyning's Primary Retail Frontage is concentrated at the thriving Cobblestone Walk.

HDC fails to acknowledge the issue of the pronounced changes to shopping habits consequent to on-line shopping and Retail Parks undermining the viability of High Street shops across the UK. The remainder of HDCs letter adds little to their case, restating the points addressed in the foregoing.

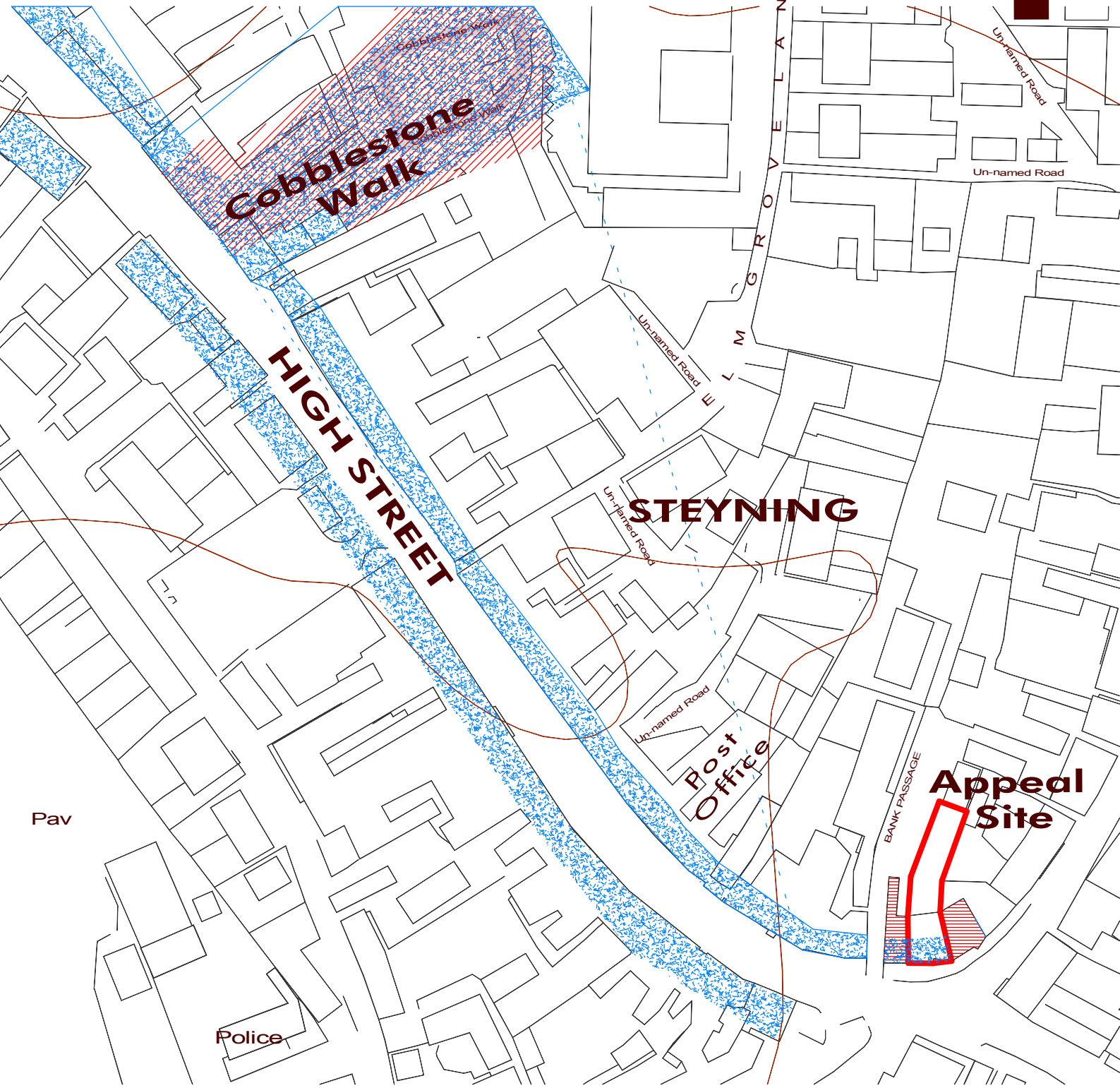
Yours sincerely,

ARNOLD WARD

Encl.

Figure Marked 1

1



Scale 1 : 1250

0m 50m

KEY

Primary Retail Frontage

Residential use adjoining No.32

Cobblestone Walk

PRIMARY RETAIL FRONTAGE