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Mr Neil Devereux
The Planning Inspectorate
Zone 3C Eagle
Temple Quay House
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16 June 2025
Ref: SL/Let/P2041

Dear Mr Devereux,

Response to Local Planning Authorities Comments (dated 3 June 2025) to APP/Z3825/W/25/3364293 - Hole Street Farmhouse, Hole Street, Wiston, Steyning, West Sussex, BN44 3DH

Following receipt of the Local Planning Authority's (LPAs) comments dated 3 June 2025, we would like to take this opportunity to reply on behalf of the Appellant, regarding the refusal of the Prior Notification for the change of use of an agricultural building to form two dwellinghouses at Hole Street Farmhouse, Hole Street, Wiston, Steyning, West Sussex, BN44 3DH.

It is noted in the LPAs comments dated 3 June 2025 that the *'applicant has, as part of their appeal included a new structural survey by Castle Consulting Surveyors'*. However, we would like to clarify that a structural survey was submitted with the original application (Ditchling Surveying Services 23 June 2024).

The additional report by Castle Consulting Surveyors (17 February 2025) does not introduce new conclusions but rather reinforces and expands upon the findings of the initial survey, namely, that the building is structurally sound and capable of conversion.

It is important to highlight that the Council did not give due regard to the original structural report when reaching its decision to refuse the application.

The Officer states *'It further considered that the Statement of case submission contains further information as to the composition of the barn, concrete base, building regulation compliance, Construction drawings, supporting wall structure and roof structure that was not included within the original submission and was not apparent at the officer site visit from a visible inspection of the building'*.

The information submitted with the original application was more than substantial and provided the Officer with a reliable position that the building was capable of conversion which was subsequently ignored. The level of detail submitted with this appeal is above and beyond what is typically required for a Class Q application. However, it has been provided to further demonstrate the robustness of the proposal, supported by the fact that two qualified RICS surveyors have independently confirmed their professional confidence in the structural integrity of the building and its suitability for conversion.

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The Officer states at Paragraph 4 that *"the initial survey report did not outline the elements of the barn that would be retained such that it was clear that the proposal would constitute a conversion and not a replacement or predominantly new structure,"* and that photographs of the barn will be included to illustrate its condition.

The Officer further states at Paragraph 5 that *"the existing building would need to be replaced to be considered a conversion and not a new structure."* However, the submitted reports clearly and explicitly identify the proposal as a conversion, not a new building or structure. This has been consistently set out throughout the application, as evidenced by its submission under Class Q. We consider the Council's statement to be misleading and question whether the proposals have been misunderstood.

It is noted at Paragraph 7 that the Officer states *'from a visual inspection of the roof, the roof structure would need to be replaced, new walls including both internal and external would be required and some works to the foundations would be required. The extent to which this building can be said to be converted therefore has still not been demonstrated.*

With respect, the Officer is not a qualified structural surveyor and, as such, is not appropriately qualified to assess the structural integrity of the building or determine the extent of necessary works. It is not reasonable to rely on a visual inspection to override the conclusions of two reports prepared by RICS-accredited professionals. The findings of qualified experts should carry greater weight than a non-expert opinion.

We also note that the Officer appears not to have fully understood the 'informative' drawings sent to help demonstrate how the building maybe converted, but not as part of the 'formal' pack subject to the Appeal (ARC-119-25-12-Current Revision-Existing Plans & ARC-119-25-13-Current Revision-Proposed Plans). These clearly show that the existing structure will remain intact and that the conversion will be carried out around the existing crossbeams. Furthermore, reference is made to a level of detail akin to building regulations drawings, which were not required at the point of initial submission. To our understanding, detailed construction drawings (albeit informative only) are not a prerequisite for validation under Class Q. Nonetheless, we have provided them voluntarily to demonstrate that the proposed works are achievable and that the existing structure is capable of conversion in accordance with Class Q requirements.

The case law and guidance from Planning Practice Guidance (PPG) make clear that a building can still be considered for conversion under Class Q even where significant building operations are required, so long as the existing structure provides the basic framework and is not being entirely rebuilt. In this instance, the proposed works fall within the scope of those allowed under Class Q, and the intention has always been to retain and convert the existing structure rather than construct a new building.

We wish to clarify that the timber panelling present within the structure is not structural. It was added solely to provide supplementary wind bracing and resistance to snow loading. This should not be mistaken as a key structural element, as the primary support is provided by the existing concrete portal frames, which remain fully intact and capable of supporting the conversion.

It has been clearly demonstrated, through detailed reports and supporting drawings, that the existing building is structurally sound and suitable for conversion. Horsham District Council appears to have misunderstood both the survey information provided and the nature of the proposals. The evidence submitted satisfies the requirements of Class Q and supports the conclusion that the development constitutes a conversion, not a new build.

We trust the Inspector will take the contents of this letter into consideration, and we look forward to receiving confirmation that the letter has been received.

Yours sincerely
ECE Planning



Huw James MRTPI
Director