

APPENDIX A – MARKETING SUMMARY AND POLICY JUSTIFICATION

(Loss of Hotel / Visitor Accommodation – Evidence of Non-viability and Lack of Reasonable Prospect of Retention)

Purpose of this Appendix

This Marketing Summary is submitted to support the planning application for the change of use of Random Hall from hotel (C1) to residential use (C3). It is provided to demonstrate, in a structured and transparent manner, that the existing visitor accommodation use is no longer realistically capable of being retained in the medium to long term, and that there is no reasonable prospect of securing a purchaser or operator to continue the lawful hotel use.

The Council's pre-application advice confirms that proposals involving the loss of hotel accommodation require evidence of marketing and non-viability to justify the loss of commercial space, with the Enterprise/Economic Development response specifically requesting a "more up to date marketing push".

This appendix responds to that requirement and should be read alongside Appendix C (Viability and Accounts Evidence), which provides independently prepared accounts demonstrating sustained declining profitability.

Relevant Policy Framework

Policy 43 of the Horsham District Planning Framework resists the loss of community facilities, leisure and cultural uses unless it can be demonstrated that continued use is no longer feasible, taking into account factors such as appropriate marketing, demand for the use, quality and usability, and the identification of a potential future occupier.



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The pre-application advice letter draws the same requirement into focus, noting that further marketing evidence would be required for a full application and that the site is considered to provide valuable visitor accommodation in principle.

Policy 34 (Heritage) is also highly material because Random Hall is Grade II listed. Where a heritage asset's existing use is failing, the planning system places particular weight on securing a viable, long-term use that ensures ongoing occupation, maintenance and conservation, thereby avoiding vacancy and decline.

Marketing Approach and Coverage

The property has been exposed to the market through specialist commercial agents over a prolonged period. Marketing has included GPS agents (Eastbourne) and subsequently Batchelor Monkhouse. The property has therefore been presented to the relevant market audience for hospitality, weddings/events and boutique accommodation, and has not been restricted to a narrow or unrepresentative advertising channel.

The marketing record demonstrates that the market has been tested on multiple occasions across a broad period including pre- and post-Covid market conditions. This is important in policy terms because it reduces the likelihood that the outcome is an artefact of a single short marketing window. Instead, it demonstrates a persistent lack of demand capable of translating into a viable sale as a going concern.

Outcomes of Marketing and What the Evidence Shows

The marketing evidence demonstrates that interest has been intermittent and has not resulted in a viable purchaser or operator. Where interest has occurred, it has typically fallen into one of the following categories.

Enquiries premised on non-standard structures, such as lease-to-purchase with deferred acquisition, or discounted purchase arrangements. Such approaches are inherently speculative and do not demonstrate a realistic prospect of securing a stable long-term hotel operator.

Enquiries from parties seeking a different scale or operational model, often requiring higher guest capacity or more extensive outside amenity space than the site can

provide, indicating a misalignment between the property and prevailing market expectations for event-led venues.

Enquiries contingent on substantial further investment and adaptation, with parties unwilling to proceed given the combined effects of purchase price, capital expenditure requirements, and operational risk.

In planning terms, these outcomes are directly relevant to Policy 43. They demonstrate that, while there is a theoretical market for wedding/event-led venues, Random Hall is not meeting that market's prevailing operational requirements or commercial expectations in a way that translates into a deliverable transaction. The evidence therefore supports the conclusion that continued hotel use is no longer feasible and that the use cannot realistically be retained through marketing.

“More Up-to-date Marketing Push” – Response

The Enterprise/Economic Development comments suggest that further marketing should be undertaken. However, the evidence shows that marketing has been sustained over a long period, including recent years, and that the site has continued to fail to attract a viable purchaser.

Most importantly, marketing is only one limb of the policy test. Even if further marketing were undertaken, the viability evidence in Appendix C demonstrates that the business is experiencing sustained decline and increasing risk to continuity. Where ongoing operation is increasingly fragile and the market has been repeatedly tested, planning policy does not require indefinite marketing in circumstances where the evidence already demonstrates no realistic prospect of retention.

Accordingly, the marketing evidence should be considered sufficient and proportionate to the policy requirement, particularly when read alongside the accounts evidence and the heritage need to secure a viable long-term use for the listed building.

Relationship Between Marketing, Viability and Heritage

The marketing evidence explains the absence of a purchaser/operator. The viability evidence explains why that outcome is not surprising. Together they demonstrate that retention of the existing use is not realistically deliverable.

In the context of a Grade II listed building, this carries particular weight because refusal of a viable alternative can result in a harmful outcome: unmanaged closure, vacancy and deterioration. The proposed residential use provides a stable route to ongoing occupation and maintenance with minimal intervention to historic fabric and is therefore the optimum viable use for the asset.

Marketing Summary Conclusion

The marketing evidence demonstrates that the hotel has been appropriately marketed through specialist agents over a prolonged period, with the market tested under differing economic conditions, and with no viable purchaser/operator emerging. The reasons for non-progression are consistent and structural, reflecting a mismatch between the site's inherent characteristics and market requirements for viable event-led or hospitality operations. When considered alongside Appendix C, the evidence demonstrates that continued hotel use is no longer feasible and that the proposed change of use is justified in planning policy terms.