

PLANNING STATEMENT

IN RELATION TO:

‘Change of use from a bakery, shop and residential flat to 4 no. residential units (3 x 2-bed flats and 1 x 2-bed maisonette). Associated alterations, include the addition of hip to gable on the eastern roof slope and new dormers to the existing roof’.

**The Model Bakery, 119 High Street, Steyning,
West Sussex, BN44 3RE**

June 2026

1.0 INTRODUCTION

- 1.1 Our client, DRPJ Limited, has instructed us to submit a planning application for the change of use from bakery, shop and 3-bed flat to 4 no. residential units (3 x 2-bed flats and 1 x 2-bed maisonette). Associated alterations include the addition of hip to gable on the eastern roof slope and new dormers to the existing roof.
- 1.2 This Planning Statement is submitted in support of the above planning application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal in light of the relevant policy and all other material planning considerations.
- 1.3 This statement should be read in conjunction with the package of proposed and existing drawings. The application is also accompanied by the following supporting statements: -
- Design and Access Statement.
 - Marketing Letter, prepared by H.J. Burt Chartered Surveyors: Estate Agents.
 - Preliminary Roost Assessment, prepared by Arbtech.
 - Flood Risk Assessment, prepared by GTA Civils and Transport.

2.0 SITE CIRCUMSTANCES

- 2.1 The application site is located on a prominent corner position, on the junction of Sir Georges Place and High Street, Steyning.



Fig 1. Aerial map showing the site and surroundings (*courtesy of DAS*)

- 2.2 The site currently comprises a building that is in part commercial, part residential use (4-bedroom flat). Located on the edge of Steyning's historic town centre, the former Model Bakery has historically occupied a more detached and peripheral

position relative to the principal commercial core of the High Street. The building operated for many years as a traditional bakery and retail premises, serving the local community as an independent business. Historically, the property also incorporated residential accommodation above the bakery, reflecting the traditional arrangement commonly found within historic High Street buildings where commercial and domestic uses were closely integrated.

- 2.3 It is understood that the Model Bakery was originally established in 1905 and was taken over by the Friedli family in 1984. At its peak, it was baking bread for over 50 local sellers. Gradually, that dwindled over the years and post-Covid it was reduced to baking for only its own 3 shops, two of which are in Steyning - one being the subject premises, and the other being a small unit in Church Street. The 119 High Street retail bakery (the subject premises) closed its doors to the public on November 9th 2024. The Applicant has advised that in March 2025, the shop began operating as a temporary community project called the 'Model Bikery'. This is a non-profit making community project repairing bikes for the local community (at a cost) and providing work experience for year 11 students at Steyning Grammar School. This project was funded by the Wilson Memorial Trust, please see website for the extent of their local projects and the ethos behind their trust funding: <https://wilsonmemorialtrust.uk/> (the 'Model Bikery' project is shown on their website). The 1-year project funding expired at the end of April and since then the Applicant has allowed the Model Bikery to temporarily remain "in occupation" on the basis that they reimburse outgoings in respect of rates, electricity and gas.
- 2.4 The existing building comprises a two-storey brick facade with a slate roof. There are various roof additions and ad-hoc rear additions.



Fig 2. Existing view from the High Street (*Courtesy of DAS*)

- 2.5 There are existing vehicular access points located at the northern end of the site as well as the southern end via Sir Georges Place These give access to areas of hard standing and parking provision for approximately 4 no. Vehicles.
- 2.6 In terms of character, the site is surrounded by residential development of varying styles and house types, with a terrace of small cottages located immediately to the west.
- 2.7 The Horsham District Policy Map confirms that the site is located within the Steyning Built up Area Boundary, where the principle of development is accepted subject to other policies in the plan. The site is within Steyning Conservation Area. Further, the site is within the archaeological notification areas nearby (**policy 34**)



Fig 3. Extract from Horsham District Council Local Plan Mapping

- 2.8 The Governments Flood Map or Planning identifies the site as being within Flood Zone 2, where there is a moderate risk of flooding. The site is not identified at being at risk from surface water flooding.

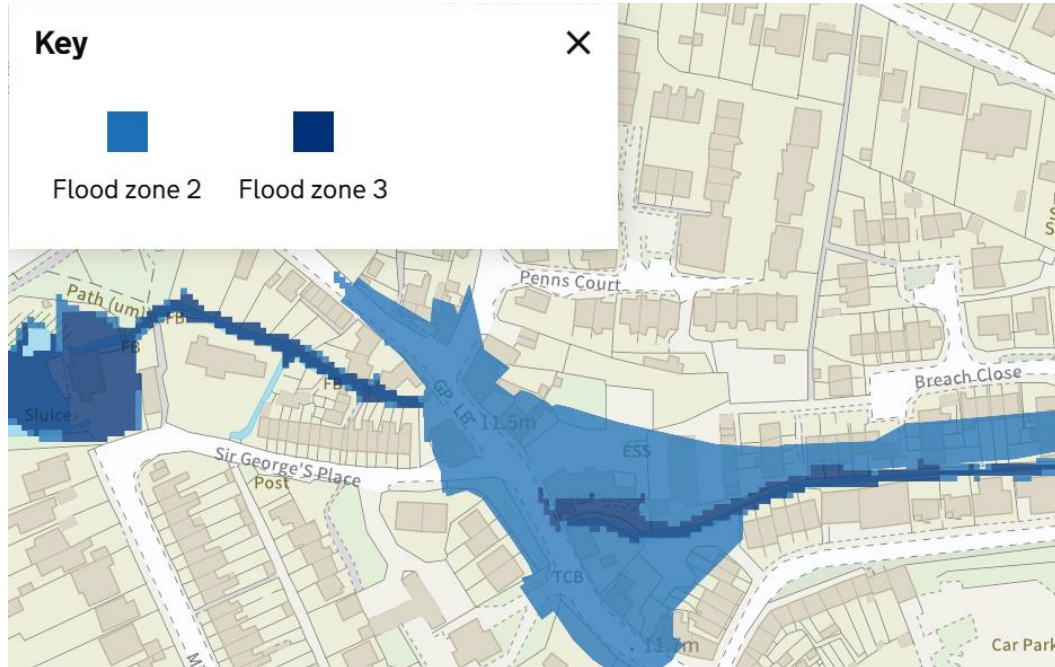


Fig 4. Extract from Governments Flood Map for Planning – Flood Risk

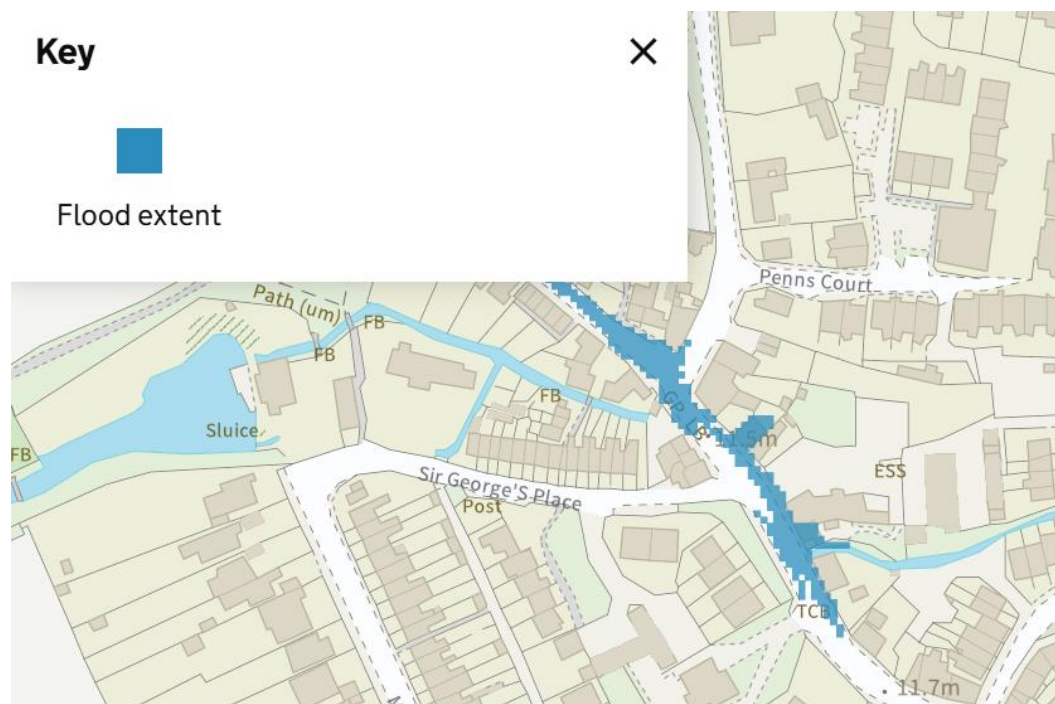


Fig 5. Extract from Governments Flood Map for Planning – Surface Water

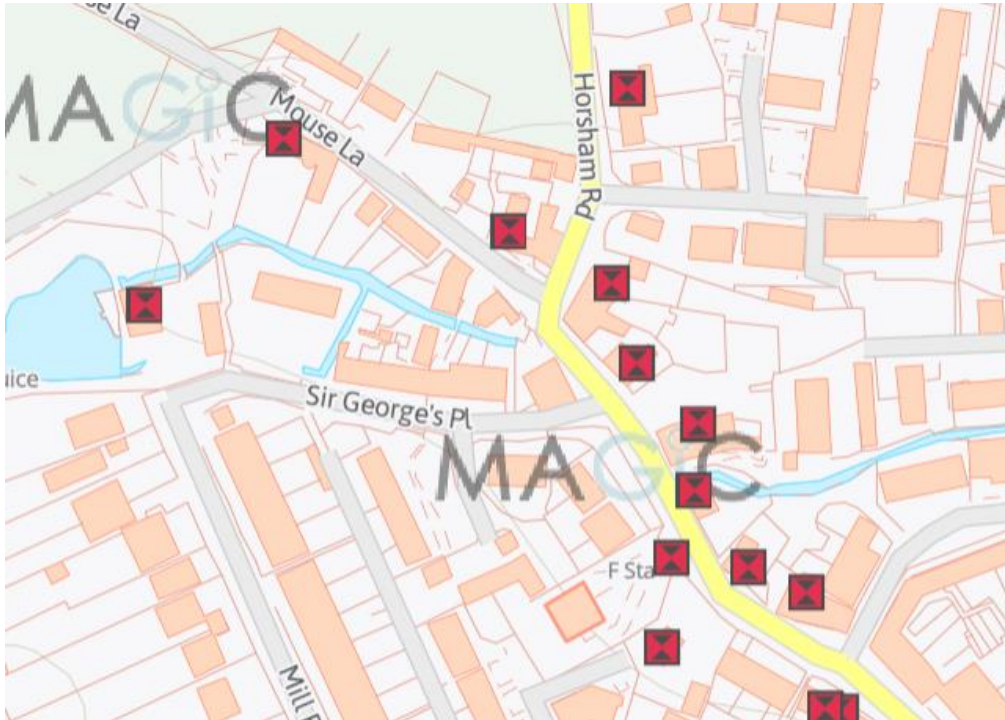


Fig 6. Map identifying Listed Buildings with red square (*courtesy of Magic Map*)

- 2.8 The application building is not Listed, however there are a number of Listed Buildings within close proximity of the site as identified by a red square at **Fig 6** above.
- 2.9 To our knowledge, the site has no other planning constraints or designations.

3.0 PLANNING POLICY

National Planning Policy Framework (NPPF)

- 3.1 The National Planning Policy Framework (NPPF) was first published on 27th March 2012 and updated on a number of occasions, the most recent version being December 2024. This sets out the government's planning policies for England and how these are expected to be applied.
- 3.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 3.3 The focus of the revised NPPF continues to be achieving sustainable development. At paragraph 8 the Framework sets out that in planning terms, and in order to achieve sustainable development there are *"three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)"*. These objectives are economic, social and environmental, which *"should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"* (paragraph 9).
- 3.4 Paragraph 11 is an important element of the NPPF. It states that: *"Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development*

plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”.

3.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”.*

3.6 Section 4 of the Plan refers to Decision-making. At paragraph 39 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.*

- 3.7 Section 5 relates to delivering a sufficient supply of homes. It reiterates at paragraph 61 that the Government's objective is to significantly boost the supply of new homes. Paragraph 65 confirms that non-major development schemes should not have to provide affordable housing (although a lower threshold is applicable in designated rural areas). Paragraph 73 identifies the important role small and medium sized sites can make to meeting the housing supply of an area. It states that local planning authorities should *"support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes..."*.
- 3.8 At paragraph 78 the NPPF sets out that *"Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*
- a) 5% to ensure choice and competition in the market for land; or*
 - b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or*
 - c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework⁴¹, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance".*

- 3.9 It continues at para 79 that *“to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences should apply:*
- a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years;*
 - b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;*
 - c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer”.*
- 3.10 Section 9 discusses promoting sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.
- 3.11 Paragraph 113 states that *“maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of*

parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists”.

- 3.12 Paragraph 116 goes on to state that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.*
- 3.13 Section 11 is entitled ‘Making effective use of land’. Paragraph 119 confirms that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”.*
- 3.14 Paragraph 120 sets out that decision makers are required to give regard to benefits of development, including environmental gains, and should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;...(and) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”.*
- 3.15 Paragraph 127 states that *“decisions need to reflect changes in the demand for land... applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area”.*
- 3.16 Paragraph 129 discusses the need to achieve appropriate densities. Account needs to be given to the identified need for different types of housing and the availability of land suitable for accommodating it, local market conditions, sustainability,

existing character and setting, and *“the importance of securing well-designed, attractive and healthy places”*.

- 3.17 Paragraph 130 states that *“area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site...local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”*.
- 3.18 Section 12 refers to achieving well-designed places. Paragraph 131 states *“the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development”*.
- 3.19 Paragraph 130 sets out that *“decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

3.20 Paragraph 139 confirms that *“development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:*

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings”.

3.21 Section 16 relates to Conserving and enhancing the historic environment. Paragraph 212 states that *“when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight*

should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.

- 3.22 Paragraph 214 continues, stating that “*where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use*”. Paragraph notes that “*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*”.
- 3.23 Further parts of the Framework that are of particular note include Section 14, which relates to matters of climate change, and flooding.

The Horsham District Planning Framework, 2015

- 3.24 On 27th November 2015 Horsham District Council adopted the Horsham District Planning Framework (HDPF). With the exception of land within the South Downs National Park, the HDPF replaces the policies contained in the Horsham District Core Strategy and General Development Control Policies which were both adopted in 2007. This plan is now more than 5 years old and as a consequence the HDPF is now out of date.

- 3.25 The HDPF sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs for the district (outside the South Downs National Park).
- 3.26 The following policies and text are considered relevant to the consideration of this Planning Proposal: -
- 3.27 **Policy 2** - *“The spatial strategy is to... (5) Continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period. (6) Manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape. (8) Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. (11) Support the provision of rural housing which contributes towards the provision of affordable housing where there is a demonstrable need...”*
- 3.28 **Policy 3** sets out the settlement hierarchy for Horsham District and confirms that *“Any infilling or redevelopment will be required to demonstrate that it is of an appropriate nature and scale”*. Steyning is identified as a smaller town and larger village; *“these are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements / each other to meet some of their requirements”*.
- 3.29 **Policy 4** - Strategic Policy: Settlement Expansion – *“The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;*

1. *The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.*
2. *The level of expansion is appropriate to the scale and function of the settlement type.*
3. *The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.*
4. *The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and*
5. *The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.”*

3.30 **Policy 12** relates to Vitality and Viability of Existing Retail Centres. It states that *“the hierarchy of retail centres will be supported and enhanced through;=...*

...2. Promotion and encouragement of activities in town and village centres so they continue to be the prime focus for community life in the district by:

... i. Suitable residential use in existing older and new buildings...”

3.31 **Policy 13** relates to Town Centre uses. Although the site is not within the identified Steyning Town Centre, this policy states that *“the Council will favour change of use of A1 to other A class uses over change of use to residential in the first instance and A5 will only be appropriate where it does not lead to an over concentration of this use. Proposals for other A Class uses and proposals for residential must demonstrate that the retail unit is no longer viable”*.

3.32 **Policy 14** relates to Shop Fronts and Advertisements. Although not specifically applicable to this development, this policy states that *“1. Applications for new, replacement and temporary shop fronts, including fascias, will be supported where the proposal respects the architectural style, character and form of the buildings or*

location of which they form a part, including appropriate use of materials, colours and illuminations. 2. Within Conservation Areas or on Listed Buildings, proposals will be expected to retain an existing traditional shop front and/or features of architectural or historic interest, through retention or restoration. This will include the use of traditional materials, traditionally painted fascias and hanging signs with muted colours. In some cases, discreet externally illuminated signs may be acceptable...”.

- 3.33 **Policy 15** sets out the housing needs for the District. It makes an allowance of 750 units throughout the plan period for ‘windfall development’. The Glossary for the plan specifies that ‘windfalls’ are described as: *“A site not specifically allocated for development in the Local Development Framework which unexpectedly becomes available for development during the lifetime of a plan.”*
- 3.34 **Policies 32 and 33** together seek high quality design and include requirements that the scale, massing and appearance of development relates sympathetically to its surroundings and that it provides an attractive environment which complements locally distinctive character.
- 3.35 **Policy 34** relates to Cultural and Heritage Assets, stating that *“the Council recognises that heritage assets are an irreplaceable resource, and as such the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets. Applications for such development will be required to:*
- ...3. Reinforce the special character of the district's historic environment through appropriate siting, scale, form and design; including the use of traditional materials and techniques;*
 - 4. Make a positive contribution to the character and distinctiveness of the area, and ensuring that development in conservation areas is consistent with the special character of those areas;*

5. Preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials; 6. Secure the viable and sustainable future of heritage assets through continued preservation by uses that are consistent with the significance of the heritage asset...”.

3.36 The following policies are also considered to be of relevance: -

- **Policy 1** - Strategic Policy: Sustainable Development
- **Policy 7** – Strategic Policy - Economic Growth
- **Policy 16** – Strategic Policy: Meeting Local Housing Needs
- **Policy 31** - Green Infrastructure and Biodiversity
- **Policy 35** - Strategic Policy: Climate Change
- **Policy 36** - Strategic Policy: Appropriate Energy Use
- **Policy 37** - Sustainable Construction
- **Policy 38** - Strategic Policy: Flooding
- **Policy 39** - Strategic Policy: Infrastructure Provision
- **Policy 40** - Sustainable Transport
- **Policy 41** - Parking

Steyping Neighbourhood Plan 2019-2031

3.37 The plan is of a general nature, but the following policies are of some relevance to this planning proposal: -

- **Policy SNDP1:** Green Infrastructure & Biodiversity – *“Development proposals, which result in a biodiversity net gain will be supported, particularly when such proposals would increase the amount of publicly accessible green infrastructure”.*
- **Policy SNDP3:** Contribution to Character – *“Development proposals which demonstrate how they will positively contribute towards Steyping’s character will be supported...Development proposals should respect the amenity of properties in their immediate locality, and respond positively and sensitively to the scale, mass, height, building materials and form of neighbouring properties”.*

Emerging Policy

- 3.38 In terms of emerging planning policy at the district level, the Horsham District Planning Framework (HDPF), was adopted in November 2015. It is a requirement of the Inspector's report on the HDPF that a review of the plan commences within three years from adoption. The Councils Local Development Scheme (LDS) confirms that a new Local Plan will be produced, which, when adopted will replace the HDPF.
- 3.39 Following a lengthy delay, it is understood that work on the new plan is underway, with examination hearings taking place in April 2026. The Inspector has provided their interim findings, and it is understood that the District Council are now working on the recommendations. A Main Modifications Plan is expected to be produced and subject to further public consultation, following which there is likely to be further examination hearings. Timescales for adoption of the new Plan are therefore not yet known, and in this context only limited weight can be given to the emerging Plan.

Supplementary Planning Guidance

- Planning Obligations and Affordable Housing SPD (2017)
- Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes

- Shaping Development in Horsham (SDPAN – Sept 2025)
- Biodiversity and Green Infrastructure

4.0 PLANNING HISTORY

(i) Application Site

4.1 The most recent planning application on the site (119 High Street, Steyning) relates to an Application for Planning Permission and Conservation Area Consent for *'Demolition of existing bakery, shop and 3-bed flat and erection of 3 x 3-bed town houses with gardens and private parking'* (references: **DC/08/1582 & DC/08/1583**), the application was recommended for approval and the Planning Committee resolved to accept the Officer's recommendation subject to a legal agreement relating to financial contributions. However, in December 2009 the District Council issued a 'deemed withdrawn' decision as no legal agreement had been entered into. The full details are as follows: -

- **Planning ref: DC/08/1582/:** Demolition of existing bakery, shop and 3-bedroom flat and erection of 2 x 2 bed town houses and 1 x 3 bed town house with gardens and private parking (Full Planning).
Withdrawn 12th January 2010.
- **Planning ref: DC/08/1583/:** Demolition of existing bakery, shop and 3-bedroom flat (Conservation Area Consent).
Withdrawn 12th January 2010.

4.2 According to the Council's online planning records, the application site also has the following earlier planning history: -

- **Planning ref: DC/07/1458/:** Change of use of existing bakery, shop and 3-bed flat to 3 x 3 bed houses and addition of 1 x 3-bed townhouse, all with private amenity space and secure parking for one car per dwelling. Demolition of existing rear kitchen extension.
Application refused 22nd August 2007.

This application was refused for the following 4 No. reasons: -

"1. The proposed development by virtue of its scale, height, bulk and massing would represent an overdevelopment of the site and would be unduly

prominent within the street scene to the detriment of the visual amenities of the area. The proposal would thus fail to preserve or enhance the character and appearance of the Steyning Conservation Area. The proposal is therefore contrary to Policies EDC1, EDC32 and HS10 of the HDLP 1997, Policies CP1 and CP3 of the Core Strategy 2007, Policies DEV1 and CH4 of the WSSP 2001-2016 and DC11 and DC14 of the emerging General Development Control Policies Submission Document.

2. The proposal by virtue of its scale, bulk and siting would detract from the residential amenities of adjacent occupiers in terms of loss of outlook and privacy and would appear overbearing. The proposal therefore conflicts with LOC1 of the WSSP 2001-2016, policies EDC1 and HS10 of the HDLP 1997 and Policy DC11 of the emerging General Development Control Policies Submission Document.

3. At the present time the applicant has not made provision for the payment of a community facilities contribution and a transport infrastructure contribution in accordance with the WSCC's SPG on Parking Standards and Transport Contributions. If permitted without such a contribution the development would conflict with Policy DEV3 of the WSSP 2001-2016, Policy CP13 of the Core Strategy 2007 and Policies G4 and TU5 of the HDLP 1997.

4. The proposed development would result in vehicles reversing in or out of the existing substandard visibility site access onto the High Street to the detriment of the road safety. The proposal is contrary to Policy TU5 of the HDLP 1997".

- **Planning ref: DC/07/1457/:** Demolition of existing rear kitchen extension (Conservation Area Consent).
Application refused 22nd August 2007.
- **Planning ref: ST/32/03/:** Insertion of 2 oven flues in roof.
Application Permitted 14th May 2003.

- **Planning ref: ST/14/01/:** Erection of carport site.
Application Permitted 13th March 2001.
- **Planning ref: ST/57/90/:** Extension to house new oven.
Application Permitted 18th July 1990.
- **Planning ref: ST/58/90/:** Extension to house new oven (Listed Building Consent). Application Permitted 18th July 1990.

(ii) Nearby Sites

4.3 We are aware of a similar change of use relating to No. 32 High Street, Steyning. The details are as follows and will be discussed in greater detail below:-

- **Planning ref: DC/24/1723/:** Change of use of existing ground floor class E(b) commercial, business and service to Class C3 Residential use to form an integral part of the existing first and second floor dwelling.
Application Refused 9th May 20025. Appeal Allowed.
- **Planning Ref: DC/24/0485/:** Change of use for the ground floor and basement commercial use to residential and material alterations to bring the property back into use as a single dwelling house (Listed Building Consent).
Application Permitted 22nd May 2024.

It should be noted that the physical works required to facilitate this change of use were deemed acceptable in heritage terms, and therefore the related Listed building consent application was approved by the Council.

5.0 THE PROPOSAL

- 5.1 This planning application seeks permission for the change of use of the building from a bakery, shop and 4-bed flat to 4 no. residential units (3 x 2-bed flats and 1 x 2-bed maisonette). Associated alterations, including the addition of hip to gable on the eastern roof slope and new dormers to the existing roof.
- 5.2 As detailed at **Fig 7** and **8** below, the ground floor would comprise Flat 1 and 2, with Flat 3 at first floor level. The proposed maisonette (flat 4) would be over two floors (first and second floor).



Fig 7. Proposed Ground and First Floor Plan

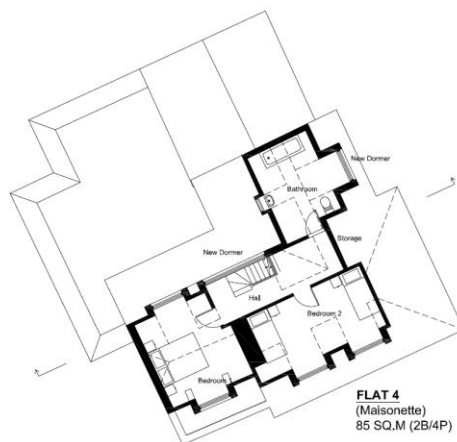


Fig 8. Proposed Second Floor Plan

5.3 The proposed unit breakdown would be as follows: -

Apartment 1	2 bedroom/ 4 person (73 sq.m)
Apartment 2	2 bedroom/ 4 person (75 sq.m)
Apartment 3	2 bedroom/ 4 person (71 sq.m)
Maisonette 4	2 bedroom/ 4 person (85 sq.m)

5.4 The DAS confirms that *“the proposals are accommodated predominantly within the envelope of the existing retained building and therefore do not result in any material change in terms of the building’s relationship with its surroundings...The overall scale and massing remain largely unchanged from the existing form, with only modest roof alterations proposed, including the introduction of sensitively designed dormer windows and the conversion of part of the western roof slope from a hipped roof to a partial gable arrangement. These alterations are considered sympathetic to the character and appearance of the building and wider High Street context...Overall, the proposals retain the established built form whilst enhancing the architectural quality and functionality of the building in a manner consistent with Horsham District Council’s design policies relating to scale, massing and contextual response”.*



RODWAY PLANNING CONSULTANCY LIMITED



Fig 9. Existing Elevations (East; North; West and South Elevations)



Fig 10. Existing Elevations (East; North; West and South Elevations)

- 5.5 The development proposal will largely retain the existing external materials, with replacement and refurbishment works undertaken on a like-for-like basis where appropriate. The proposed external materials are detailed below, and our client would be happy for these to be conditioned accordingly: -
- Red facing brickwork to the external walls.
 - Slate and clay plain roof tiles.
 - High-performance Crittall-style windows and doors.
- 5.6 With regard to amenity space, the ground floor apartments each benefit from private patio areas.
- 5.7 With regard to access arrangements, access to the proposed apartments will be taken from the existing points of access via High Street and Sir Georges Place. The development will utilise the existing parking areas within the site and will provide 4 no. off-street parking spaces, equating to one space per apartment. In addition, secure and covered cycle storage will be provided within the rear parking court.
- 5.8 Dedicated refuse and recycling storage areas will be provided within the parking courts.
- 5.9 With regard to landscaping, areas of soft landscaping and native planting are proposed within the parking courts and external spaces to soften the appearance of hardstanding areas, improve the visual quality of the site and contribute positively towards biodiversity enhancement.

6. PLANNING ASSESSMENT

a. Principle of New Development

- 6.1 As outlined above, this planning application seeks permission for the change of use of the building from a bakery, shop and 4-bed flat to 4 no. residential units (3 x 2-bed flats and 1 x 2-bed maisonette). Associated alterations, including the addition of hip to gable on the eastern roof slope and new dormers to the existing roof.
- 6.2 It is noted that the HDPF is now over 10 years old. In this context it is important to note that Paragraph 34 of the NPPF states: *“policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future”*. The 5 year review of a Local Plan is a legal requirement, as set out in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is understood that Horsham District are preparing a new Local Plan; with Examination Hearings having taken place during April 2026, following a significant delay.
- 6.3 Currently the HDPF remains out-of-date in terms of the housing requirement, and a new Local Plan can only be given limited weight at this time. Therefore, there is currently a policy vacuum, and as a consequence our position is that the Council’s decision making should be led by the NPPF, and in particular the criteria set out at paragraph 11.

- 6.4 The District Council's policy map confirms that the site application site is located within the defined built-up area boundary, where the principle of new development is accepted subject to other policies in the plan.
- 6.5 It is noted that this proposal follows a previous planning application and Conservation Area Consent for '*Demolition of existing bakery, shop and 3-bed flat and erection of 3 x 3-bed town houses with gardens and private parking*' (references: DC/08/1582 & DC/08/1583) on the site, which was recommended for approval. The Planning Committee resolved to accept the Officer's recommendation subject to a legal agreement relating to financial contributions; however, the District Council issued a 'deemed withdrawn' decision as no legal agreement had been entered into.
- 6.6 At the time of this application being assessed, the Planning Officers accepted the principle of the development, including the loss of the established bakery and shop. They stated that: -

"The current scheme has been submitted in response to the issues raised in the previous applications (DC/07/1457 & DC/07/1458) which were refused on the grounds of the proposal's adverse impact on the character and appearance of the Conservation Area and the residential amenities of neighbouring occupiers; highway safety and non-provision of contributions. In this respect, the number of the units has been reduced from four to three and the scale of the proposal has also been significantly reduced so that the development is now smaller in terms of footprint than the existing building. Given this reduction in scale, the proposed development would come no closer to the neighbouring property, no.14 St Georges Place, than the existing building and as such the separation distance, of a minimum of 7 metres, would be maintained. It is therefore considered that the proposal would have no more of an impact on the neighbouring dwelling than the existing bakery building and the residential amenities of the neighbour should not be adversely affected.

Notwithstanding the amendments to the scale of the development, concern remained with regard to the design of the proposal. Whilst the existing building is of no special architectural or historic interest, it nevertheless occupies a prominent High Street location and in consequence it has a significant impact on the character of the surrounding Conservation Area. The County Conservation Architect considered that the prominence of the site within the street scene makes it one of 'landmark' status, and whilst not greatly increasing the existing built form, any redevelopment should be distinguished with a sensitive and characteristically local architectural treatment. The scheme as originally proposed however was not considered to possess any locally distinctive features. Therefore following further discussions with the applicant amended plans were submitted which the County Conservation Architect considered appropriate to the local context. In this respect, the scheme now incorporates such features as a first floor bay window on the corner of St Georges Place and the High Street, additional detailing to the sash windows, conservation type roof lights and leaded dormer windows. Furthermore, the boundary wall on the eastern boundary would be constructed of brick with flint panels which is considered to be in keeping with the character of the surrounding area. It is your officers view that the scheme as amended would act as a distinctive landmark at the north western end of the High Street and make a positive contribution to the surrounding Conservation Area.

The County Surveyor has advised that he raises no objection to the proposal as a result of the proposed closure of the High Street access which suffers from poor visibility. There is no apparent visibility issue at the point of the access onto St Georges Place. Furthermore, vehicles would be able to enter and exit the site in forward gear and there should therefore be no adverse impact on highway safety.

In conclusion, it is considered that the proposal would not have a detrimental impact on the residential amenities of existing properties and would make a positive contribution to the character and appearance of the surrounding Conservation Area”.

- 6.7 As per the above previously supported application, the current development proposals would result in the loss of the commercial use at this site, as well as the provision of increased residential accommodation (4 No. flatted units replacing the one existing flat). In this instance however, the development proposals seek to sensitively convert and refurbish the existing building, rather than demolish it. As such, the built form would remain largely unaltered as a result of the development.
- 6.8 The DAS notes that *“the proposals relate to the sensitive conversion and refurbishment of the former Model Bakery building at 119 High Street, Steyning, which is currently vacant and in a dilapidated condition. Historically, the building accommodated both a bakery use at ground floor level and residential accommodation above, forming part of the established mixed-use character of Steyning High Street.*

The development represents the sustainable re-use of an existing building within a highly accessible location and will contribute towards the delivery of additional high-quality housing within Horsham District. In this regard, the proposals support the objectives of Horsham District Council’s spatial and housing policies through the efficient use of previously developed land within an established settlement boundary.

The proposals seek to rejuvenate and secure the long term future of the building through its conversion into 4 no. thoughtfully designed apartments, delivering a form of development that accords with the overarching design aspirations of Horsham District Council in relation to high-quality and contextually responsive development.

The architectural approach responds positively to the semi-industrial character and historic grain of the High Street, retaining the established scale, form and appearance of the building whilst introducing a series of carefully considered enhancements. These include the introduction of high-quality Crittall-style windows and the refurbishment and replacement of roof finishes using slate and clay plain tiles, elevating the overall quality and appearance of the building whilst preserving

its established character. The proposals therefore align with Horsham District Council policies that seek to conserve and enhance local character and distinctiveness”.

b. Five-year housing land supply

6.9 At the current time, it is understood that HDC’s position is that they are unable to demonstrate a 5-year housing land supply.

6.10 Horsham District Council Authority Monitoring Report 1st April 2024 – 31st March 2025 states that *“for the 2024/25 monitoring year, a total of 328 net dwellings were completed. The Government has not yet published the Housing Delivery Test measurement for 2024, however in 2023 Horsham District had only delivered 62% of its overall housing target over the previous three years. The standard method formula with a 20% buffer gives a new five year supply target of 8,028. The Council can only demonstrate a 34% (1.7 years) supply against the new requirement”.*

6.11 This is a material planning consideration, which weighs in favour of the planning proposal. Paragraph 11(d)(ii) of the NPPF is therefore engaged, which confirms that planning applications should be determined with a presumption in favour of sustainable development applied (‘the tilted balance’).

c. Loss of Bakery/ Shop

6.12 Paragraph 119 of the NPPF confirms that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”.*

6.13 **Policy 12** of the HDPF relates to Vitality and Viability of Existing Retail Centres. It states that *“the hierarchy of retail centres will be supported and enhanced through;=...*

...2. Promotion and encouragement of activities in town and village centres so they continue to be the prime focus for community life in the district by:

... i. Suitable residential use in existing older and new buildings...”.

- 6.14 **Policy 13** relates to Town Centre uses. Although the site is not within the identified Steyning Town Centre, this policy states that *“the Council will favour change of use of A1 to other A class uses over change of use to residential in the first instance and A5 will only be appropriate where it does not lead to an over concentration of this use. Proposals for other A Class uses and proposals for residential must demonstrate that the retail unit is no longer viable”.*
- 6.15 Further, **Policy 14** relates to Shop Fronts and Advertisements. Although not specifically applicable to this development, this policy states that *“1. Applications for new, replacement and temporary shop fronts, including fascias, will be supported where the proposal respects the architectural style, character and form of the buildings or location of which they form a part, including appropriate use of materials, colours and illuminations. 2. Within Conservation Areas or on Listed Buildings, proposals will be expected to retain an existing traditional shop front and/or features of architectural or historic interest, through retention or restoration. This will include the use of traditional materials, traditionally painted fascias and hanging signs with muted colours. In some cases, discreet externally illuminated signs may be acceptable...”.*
- 6.16 We are aware of a recent case at the other (south) end of the High Street relating to the tea rooms (No.32). This site is part of the main retail area of the town centre, and in that way differs from our site. The site has had applications refused due to the loss of the commercial use and water neutrality; whilst the physical works required to facilitate this change of use was deemed acceptable in heritage terms. However, the latest refusal for change of use (DC/24/1723) has been recently allowed at appeal.

6.17 This appeal related to ‘*change of use of existing ground floor Class E(b) commercial, business and service to Class C3 residential use to form an integral part of the existing first and second floor dwelling*’. The appeal considered the two main issues to be:-

“(a) The effect on the vitality and viability of Steyning Centre, and

(b) The effect upon the integrity of the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites”.

Only the first point is applicable to this case.

6.18 The decision noted that “*Policy 13 of the Horsham District Planning Framework 2015 (HDPF) states that consideration will be given to the impact of the proposed non-commercial use in terms of its importance within any given frontage. Evidence of the appropriate marketing of empty properties will be required. It goes on to say in terms of small scale development that the Council will favour change of use of A1 to other A class uses over change of use to residential in the first instance. It states that proposals for other A Class uses and proposals for residential must demonstrate that the retail unit is no longer viable*”. They went on to note that “*the property has now been on the market for approximately three years with significant reductions in asking price made during this period. Whilst the reasons for each of the viewings not being carried forward have not been explained, it is clear that an offer for the property was accepted only for the buyer to subsequently withdraw. Subsequent viewings have also not resulted in any further offers. Although the Council seeks further marketing information and financial assessment, the details provided by the appellant reasonably show that the property has been marketed over a lengthy period and that, despite numerous viewings and one subsequently withdrawn offer, no buyer has been found.*

I also give some weight to the likely difficulties in making provision for the independent use of the upper residential floors of the listed building due to the

internal layout of the building. This would appear to reduce the scope for a full independent subdivision of the building involving separate occupants.

I have also considered the aforementioned 2005 planning permission which includes a condition restricting the use to Class E(b). Whilst there has been a previous s73 application seeking to remove this restriction, this was refused and it is not clear as to what the Council's position would be in determining any future application.

I also note paragraph 90(f) of the National Planning Policy Framework 2024 ('the Framework'), recognises that residential development often plays an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.

Although the site is located within the defined Primary Retail Frontage, it is located at the southern edge of the frontage. As noted by the Council in granting listed building consent for the works that would facilitate the proposed change of use, it is located in a transition area where the commercial character of the High Street is becoming less overt and a more residential character is emerging. Indeed, the properties on either side of the appeal building are residential. This peripheral location is material to the merits in this case. It follows that the proposal would not result in any significant disruption to the continuity of commercial activity, nor would it undermine the role of this frontage in supporting the wider centre.

At my site visit, I noted that there were few unoccupied premises with a good range of existing shops and services. However, whilst the appellant's marketing has fallen short of the Council's expectations, I am satisfied that it has provided cogent evidence to indicate that the ground floor unit in this case is not viable for commercial use.

I conclude that it has been satisfactorily demonstrated that the proposal would not result in the loss of a viable commercial floor space and that no material harm would result upon the vitality and viability of the Steyning Centre. It would satisfactorily be in accordance with Policies 7 and 13 of the HDPF and the Framework.

- 6.19 It is important to note that the Applicant's site is not part of the main retail area of the town centre. Further, it is acknowledged that the Inspector referred to the site of No. 32 as being within a 'transition area *where the commercial character of the High Street is becoming less overt and a more residential character is emerging. Indeed, the properties on either side of the appeal building are residential. This peripheral location is material to the merits in this case. It follows that the proposal would not result in any significant disruption to the continuity of commercial activity, nor would it undermine the role of this frontage in supporting the wider centre*'. Our application site is located further away from the main retail area of the town centre and as such, it would follow that the above argument would be applicable and should arguably be given greater weight in relation to this proposal.
- 6.20 We note that the proposal would involve the loss of the commercial premises, however given the site's location outside of the core of the town centre of Steyning, this loss is considered to be acceptable. Further, it is noted that **no objections** were raised to the loss of the Bakery or retail use at the time of the most recent planning application on the site (ref: DC/08/1582/ & ref: DC/08/1583/).
- 6.21 Notwithstanding this point, this application is accompanied by a Marketing Letter, which has been prepared by H.J. Burt, Chartered Engineers: Estate Agents.
- 6.22 The letter confirms the following background information regarding the Friedli Family: -
- *"Model Bakery was originally established in 1905 by the Bristow family and later operated by the Green family until 1972, when it was acquired by the Friedli family.*
 - *The business was subsequently managed by Phillip and Peter Friedli, who took over in 1984.*

- *At its peak, the bakery supplied 56 wholesale customers, including hotels, restaurants, delicatessens, and other bakeries. It also operated two retail outlets in Steyning—one in Church Street and another at 119 High Street.*
- *Over time, the bakery side of the business declined, particularly after 2010 due to increased competition from supermarket-produced bread. As the Friedli brothers approached retirement, it became evident that continuing or selling the bakery operation was not viable. Much of the equipment had become outdated and non-compliant with modern health and safety standards, and there was little market demand for a bakery of this size, type, and location.*
- *In April 2025, HJ Burt were instructed to market the property for sale. The retail unit at 119 High Street was closed at that time due to a lack of financial viability, although the Church Street shop has continued trading using externally sourced products.*

Statement (Luke Green, HJ Burt Estate Agents)

- *The property was formally launched to the open market on 2 April 2025 and was marketed across major property platforms, including Rightmove, Zoopla, and OnTheMarket.*
- *It was also prominently displayed in the window of our offices, including our main office located on the same road as 119 High Street (Model Bakery).*
- *Prior to the public launch, the property was circulated to 27 qualified applicants from our internal database. Of these, 15 confirmed that the property did not meet their requirements, primarily due to their preference for financially viable commercial investments or development sites with existing planning permission.*
- *Between 2nd April 2025 and the exchange of contracts on 23rd September 2025, approximately 50 enquiries were received. The majority of these enquiries focused on the potential gross development value (GDV) associated with various residential redevelopment schemes. No enquiries were received from parties interested in retaining or exploring the existing commercial use of the property.*

- *A total of four offers were received during the marketing period, all of which were submitted by parties intending to redevelop the site for residential purposes.*
- *The property is situated at the end of the High street away from any other commercial and has little passing trade either by pedestrian or space to stop and park. In the main body of the high street there are two supermarkets and a bakery. There are currently unoccupied retail units up for rent which includes the old antiques shop and the Tea rooms that have been empty for years”.*

6.23 As set out in detail above, the property has been marketed, with the only interest from persons who wished to redevelop the site for residential purposes. The marketing report confirms that *“the property is situated at the end of the High street away from any other commercial and has little passing trade either by pedestrian or space to stop and park. In the main body of the high street there are two supermarkets and a bakery. There are currently unoccupied retail units up for rent which includes the old antiques shop and the Tea rooms that have been empty for years”.* Given the site circumstances, the development proposal would make an effective use of the site and introduce a suitable residential use in an existing older building, in line with guidance contained within the NPPF and **Policy 12** of the HDPF. We are of the opinion that the loss of the commercial use would be acceptable given the location of the site and the character of the surrounding area, which has an established planning precedent for similar forms of development.

d. Flood Risk and Drainage

- 6.24 The application is accompanied by a Flood Risk Assessment, which has been prepared by GTA Civils & Transport.
- 6.25 The report confirms that the site lies in Flood Zone 2 (Medium Risk). It states that *“Inland sites in FZ2 are defined in Appendix C of the 2025 National Planning Policy Framework (NPPF) as being susceptible to flooding with an annual exceedance probability (AEP) of greater than 1 in 1000 years but less than 1 in 100 years (1% -*

0.1%). Another reason why a site may be zoned in FZ2 is due to historical flooding. This appears to be the case here – because both flood patterns match exactly – and the EA’s FRA data-pack shows the site having flooded in 1980 and possibly a narrow strip on the south boundary affected in 1981 and 1974”.

- 6.26 With regard to surface water flooding, the report confirms that *“such flooding can occur when excess rainwater does not infiltrate into the ground, or is not intercepted by urban drainage systems, and instead flows across the surface. The EA’s online Surface Water Extents Flood Map for the 2040-2060 epoch, in Appendix C, shows the site is affected by a significant overland flow route in the 1000yrs scenario. There is no flooding greater than 30cm as shown on the EA’s online Surface Water Depth Flood Map for the 2040-2060 epoch, with the setting at 30cm – refer to Appendix C. This clear area extends to the highway where the level is 11.52m AOD. The low chance (1 in 1000yrs) maximum surface water flood depth is therefore 11.82m AOD, ie comparable to the tidal flood level as set out above in section 2.5m”.*
- 6.27 It concludes that *“the flood risk profile of the building and external areas within the site is High: it is liable to flood from tidal and surface water sources. The highest predicted flood level is 11.83m AOD”.*
- 6.28 The report outline the proposed development and flood mitigation strategy as follows: -
- “Flood Mitigation: because there is currently a high floor to ceiling height at ground floor level, it is proposed to raise the ground floor level, adding 650mm over the ground floor. The minimum floor level shall be 12.43m AOD, which shall provide a minimum of 0.6m of freeboard above the critical tidal flood level of 11.83m AOD and 0.61m freeboard above the critical surface water flood level. This level of freeboard is needed due to the sleeping accommodation on the ground floor. The Sequential and Exception Tests are not needed to be considered in this case – as the development comprises change of use only.*

There is no issue with floodplain volumes – as there are no proposed alterations to the building’s fabric – or to the external levels around the site.

Safe Access To Dry Land: In order to comply with the NPPF, all occupants must be able to make their way to dry land, unassisted by the Emergency Services. This is known as ‘safe access to dry land’ and it does not have to be dry, just not hazardous (safe).

Occupants of the ground floor flats shall have no place of refuge or safe route to dry land. The likely duration of flooding in both scenarios is short: surface water flooding is flashy, with peak levels lasting only 15-40 minutes. Tidal flooding is cyclical and so the peak flood level would last only between 60 and 120 minutes. Occupants shall remain safely above the flood level – as there is 0.6m of freeboard. Because there is no safe access/egress (occupants may have good reason to not wait for the flood level to drop to a safe level), a Flood Warning and Evacuation Plan has been prepared – refer to Appendix E. Occupants should prepare for such an eventuality – if necessary”.

- 6.29 The report concludes that *“this development will not increase the flood risk, either on this site or to neighbouring properties, and so complies fully with the 2025 NPPF and current PPG”.*
- 6.30 The development proposal would be acceptable from a flood risk perspective and would be compliant with government guidance set out within the NPPF and Local Level **Policy 38** of the Horsham District Planning Framework.

e. Highways Impacts and Sustainability

- 6.31 With regard to sustainability, the site is located in a very sustainable location. Steyning High Street is home to a variety of facilities and services, which includes a health centre, a Co-op, and a large number of varied other retail establishments, pubs and restaurants, and leisure and recreational uses all within easy walking distance of the Application Site.

6.32 The following schools are also proximate the site: -

Primary Schools

Steyping CofE Primary School	0.4 miles
Upper Beeding Primary School	1.3 miles
Ashurst Primary School	2.9 miles

Secondary Schools

Steyping Grammar School	0.3 miles
Lancing College	3.2 miles
Sompting Abbotts School	3.6 miles

6.33 With regard to public transport, the closest train station is at Lancing (4.3 miles). There are a number of bus stops within close proximity of the site (as depicted by a black dot on **Fig 11**).

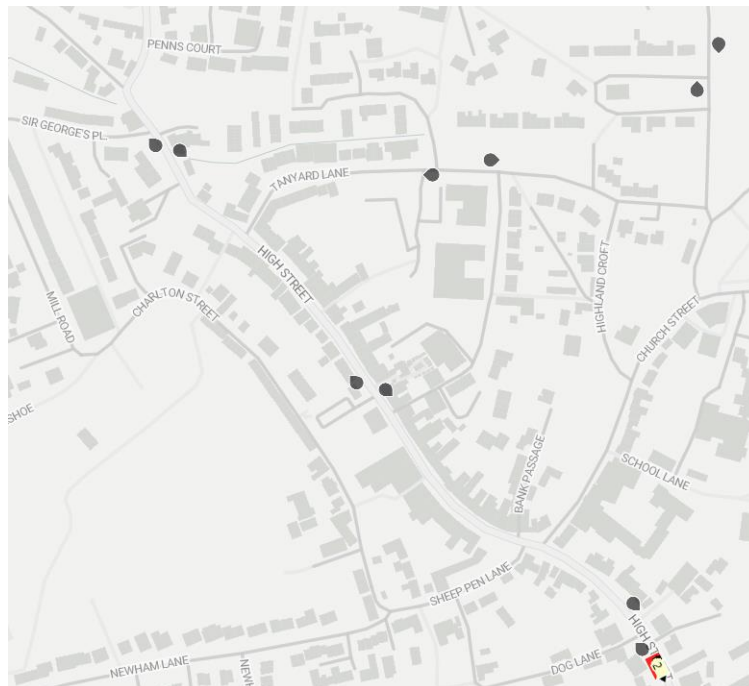


Fig 11. Closest Bus Stops (*courtesy of bustimes.org*)

- 6.34 It is our opinion that the site is located within a highly sustainable location, as confirmed by Steyning's position in the HDPF's Settlement Hierarchy as a 'smaller town and larger village', which are acknowledged as being *"settlements with a good range of services and facilities, strong community networks and local employment provision..."*
- 6.35 Access to the proposed apartments will be taken from the existing points of access via High Street and Sir Georges Place. The development utilises the existing parking areas within the site and will provide 4 no. off-street parking spaces, equating to one space per apartment.
- 6.36 The DAS confirms that *"the level of parking provision has been informed by the site's sustainable and accessible location, including its close proximity to existing public transport connections and local services within the High Street. As such, the proposals adopt a balanced and proportionate approach to parking provision that responds appropriately to the site context and anticipated patterns of travel...The development has been designed in accordance with the relevant transport and parking objectives of Horsham District Council planning policy and is considered to provide an appropriate level of parking for the scale and nature of the proposals. The scheme also supports wider sustainability objectives by encouraging opportunities for alternative modes of travel, including walking, cycling and the use of public transport, thereby reducing reliance on private vehicle use where possible"*.
- 6.37 The development proposal will also incorporate secure cycle parking for up to 6 No. bicycles, which will be located within the northern parking court.
- 6.38 The proposal would be acceptable from a highways perspective, compliant with guidance contained within the NPPF and **policies 39, 40 and 41** of the HDPF and draft policies **24 and 25** of the emerging local plan.

f. Character and Visual Amenity

- 6.39 Paragraph 135 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible.
- 6.40 **Policies 25, 32 and 33** of the Horsham District Planning Framework (HDPF) (2015) requires development to be of a high standard of design and layout. Development proposals must be locally distinctive in character and respect the character of their surroundings. Where relevant, the scale, massing and appearance of development will be required to relate sympathetically with its built-surroundings, landscape, open spaces and to consider any impact on the skyline and important views.
- 6.41 The development proposal seeks change of use from bakery, shop and 3-bed flat to 4 no. residential units (3 x 2-bed flats and 1 x 2-bed maisonette).
- 6.42 Rather than choosing to demolish the building (as per the previous application on the site), this proposal seeks the sensitive conversion and refurbishment of the former Model Bakery building at 119 High Street, Steyning, which is currently vacant and in a dilapidated condition.
- 6.43 The proposed external works are detailed below (refer to **fig 12** and **13**) and include the addition of hip to gable on the eastern roof slopes and new dormers to the existing roof.

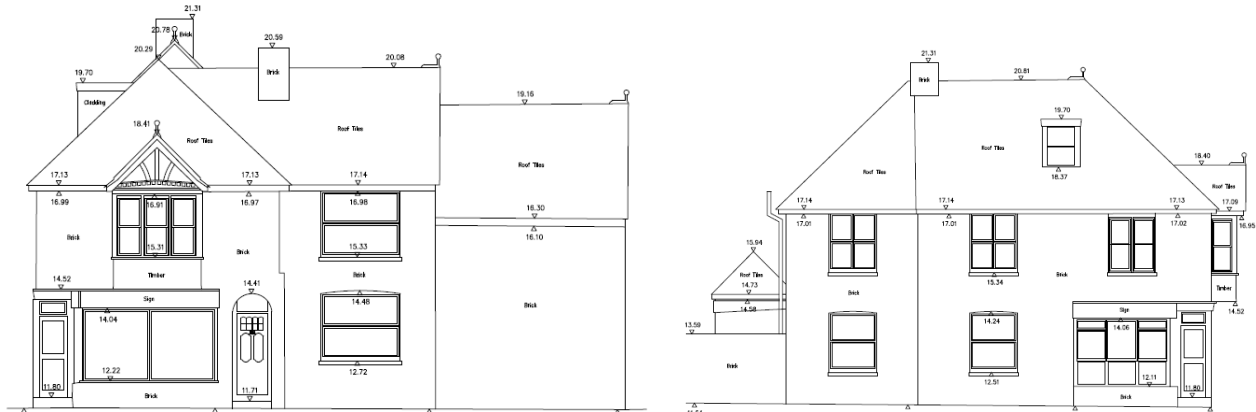


Fig 12. Existing East and South elevations

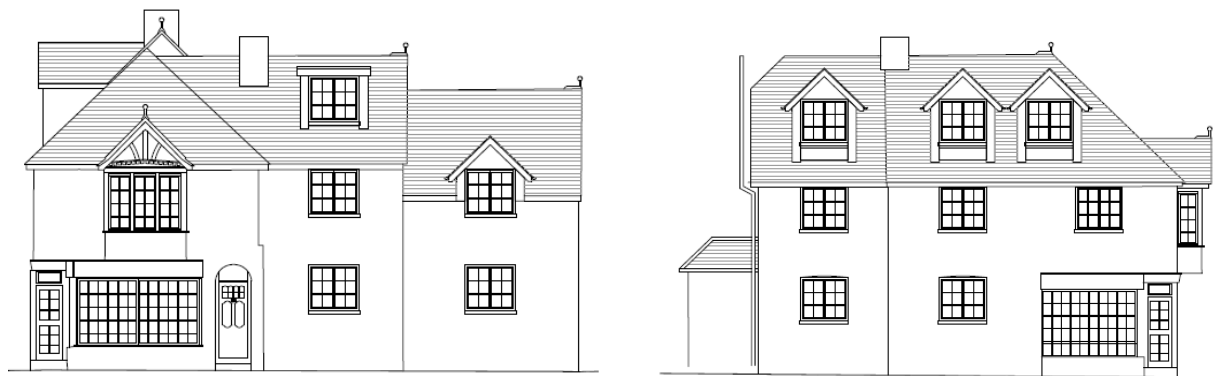


Fig 13. Proposed East and South elevations

- 6.44 The Model Bakery is located on a corner site, adjoining the High Street to the front east side and Sir Georges Place to the south side. The roof alterations and addition of a number of modest sized dormers have been sensitively designed. The dormers will be sympathetic in design, being small in scale and set well below the main roof line, which in our opinion would enhance the character and appearance of the building as view from the surrounding street scenes.
- 6.45 The DAS confirms that *“the proposals are accommodated predominantly within the envelope of the existing retained building and therefore do not result in any material change in terms of the building’s relationship with its surroundings...The overall*

scale and massing remain largely unchanged from the existing form, with only modest roof alterations proposed, including the introduction of sensitively designed dormer windows and the conversion of part of the western roof slope from a hipped roof to a partial gable arrangement. These alterations are considered sympathetic to the character and appearance of the building and wider High Street context...Overall, the proposals retain the established built form whilst enhancing the architectural quality and functionality of the building in a manner consistent with Horsham District Council's design policies relating to scale, massing and contextual response".

- 6.46 The development proposals will provide 4 No. apartments within the existing built form, which would appear in keeping with the form, scale and pattern of development along Steyning High Street and Sir Georges Place. We are confident that the development proposal will sit sensitively in its setting, fulfilling the requirement to ensure that the intrinsic character area is recognised and that the development contributes to protecting the existing built environment. The proposals would provide an efficient use of the available land resource without resulting in any harm to the existing character and appearance of the Steyning Conservation Area.
- 6.47 The resultant high-quality development would sit comfortably within the context of the immediately surrounding area, in compliance with policies guidance contained within the NPPF, **Policies 32 and 33 and 34** of the HDPF and **Policy SNDP3** of the Steyning Neighbourhood Plan.

g. Residential Amenity

- 6.48 **Policy 32** of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contribute a sense of place both in the buildings and spaces themselves. **Policy 33** continues

that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land.

- 6.49 There is currently a residential use of the site, with the proposal merely seeking the loss of the existing bakery bakery, shop and 3-bed flat to form 4 no. residential units. Further, in terms of character, the site is surrounded by residential development of varying styles and house types, with a terrace of small cottages located immediately to the west
- 6.50 The site adjoins roads to the east and south sides. There is a row of terraced properties to the west side and Forge House to the north. The development proposal is proposing no changes to the footprint of the building, with the separation distances between the building and neighbouring properties remaining unaltered because of the development. As such, it is our opinion that the development proposal would not cause demonstrable harm to the residential amenities of this property by way of loss of light, loss of privacy, or overbearing effect.
- 6.51 Access to the proposed dwellings will be taken from the existing points of access via High Street and Sir Georges Place. Although the number of residential units will increase as a result of development, the proposal would also result in the loss of a commercial use (Bakery and Shop), and as such it could be argued that any increase in site usage would be negligible and in our opinion would not cause demonstrable harm by way of increased noise and disturbance associated with movements generated by the proposed new housing.
- 6.52 The proposal would be acceptable with guidance contained within the NPPF and **Policies 32 and 33** of the HDPF.

h. Space Standards

- 6.53 The development proposal would comprise 3 No. two bedroom (4-person occupancy) flats and 1 No. two bedroom (4-person occupancy) maisonette. It should be noted that the dwellings have been designed internally to meet the requirements laid out in the Governments 'Technical Housing Standards - nationally described space standard' document. The proposed one storey, two-bedroom (4 per occupancy) flats would each comfortably exceed the 70sqm requirements (Flat 1 - 73sq.m; Flat 2 - 75 sq.m; Flat 3 - 71 sq.m). The maisonette would have a gross internal floor area of 85sqm, which would more than exceed the 79sq.m requirement.

i. Water Neutrality

- 6.54 Following the Natural England's statement issued in October 2025 which confirms that its Water Neutrality Position Statement of September 2021 has been withdrawn, it is now understood that there are no Water Neutrality requirements for this development proposal. It is further understood that HDC will now be using the 2024/25 water efficiency savings made by Southern Water to allow all development to move forward as water neutral from 1st November 2025. The District Council's website confirms that for planning applications there is no longer a requirement for a Water Neutrality Statement, and no payment into Sussex North Water Certification Scheme will be needed. However, it is further noted that the Council's website advises that *"given the area remains at significant water stress, all applications for new housing will be required by condition to comply with the Building Regulations Part G Optional Technical Standard (currently 110 l/p/d) as required by Policy 37 of the Horsham District Planning Framework. We would welcome and support any applicant who still wishes to include water efficiencies below this standard."*

j. Ecology

- 6.55 The planning statement is accompanied by a Preliminary Roost Assessment, which has been prepared by Arbtech.

6.56 The report concludes that *“the building within the site is assessed as **moderate** value to roosting bats, due to a number of suitable roosting features that could support crevice-dwelling bats...Two bat emergence/re-entry surveys will be required on B1, requiring four surveyor positions to provide full coverage of the building's elevations. If bat roosts are confirmed in the building one additional survey may be required to characterise the roost and to inform an EPSL application to Natural England”*.

6.57 Our client is fully committed to carrying out the suggested mitigation measures and would be happy for this to be ensured via condition. The proposal would be compliant with the guidance contained within the NPPF and **Policy 31** of the HDPF and Policy SNDP1 of the Steyning Neighbourhood Plan.

k. Biodiversity Net Gain

6.58 It is understood that the proposals are ‘de minimis’ and therefore exempt from BNG.

l. Sustainable Development Assessment

- The Economic Objective

6.59 The proposed development is seeking change of use of the building to 4 No. flats (3 units net). It is considered that this provision would make a small, albeit positive contribution to the building industry of the area. The proposed development would result in the creation of construction jobs during the build period. The additional population will generate more local spending in the local community, provision of infrastructure and services. In summary, it is clear that these economic benefits, which are directly associated with the implementation of the proposed development, would secure both short and long term economic benefits to the settlement of Steyning and the wider locality generally. These are material to the consideration of the scheme and are an additional factor in favour of the proposals.

- The Social Role

6.60 The NPPF seeks to promote a strong vibrant and healthy community by providing the supply of housing required to meet the needs of present and future generations and by creating a high quality built environment, with accessible local services that reflect the community's needs and supports its health, social and cultural well-being.

6.61 The site is located within the built-up area boundary of Steyning, where the principle of new development is accepted subject to other policies in the plan. We are aware of the Council's current lack of Housing Land Supply and in our view, the erection of 4 No. flats (3 No. Net) will make a small, albeit useful contribution towards the Council's housing stock which will provide housing for future generations.

- The Environmental Role

6.62 The application scheme would represent a high-quality and sensitive conversion and refurbishment of the former Model Bakery building at 119 High Street, Steyning, which is currently vacant and in a dilapidated condition. It is our opinion that the change of use would appear wholly appropriate in the context of this local area and would make a welcome introduction to this locality.

6.63 The DAS confirms that *"there are currently no existing trees or meaningful soft landscaping features within the site and therefore no tree removal is required to facilitate the proposed development...The proposals will introduce areas of soft landscaping and native planting within the parking courts and external spaces to soften the appearance of hardstanding areas, improve the visual quality of the site and contribute positively towards biodiversity enhancement, in accordance with Horsham District Council's environmental and landscape policy objectives"*.

6.64 The planning statement is accompanied by a Preliminary Roost Assessment, which confirms that *"the building within the site is assessed as **moderate** value to roosting*

bats, due to a number of suitable roosting features that could support crevice-dwelling bats...". Our client is fully committed to carrying out the recommended further survey work and implementing the suggested mitigation measures.

- 6.65 We therefore consider that this scheme is entirely appropriate in environmental terms, and specifically with respect to its impact on the character of the area, which is located within a conservation area. The change of use and conversions works have been sensitively designed and would help to conserve both the building and the character and appearance of the surrounding conservation area.

7. CONCLUSIONS

- 7.1 This application seeks to convert an existing bakery/shop and flat above to provide 4 no. flats. The site is outside the town centre, and has previously planning history of an application where the loss of the bakery/shop was accepted.
- 7.2 The District is unable to demonstrate a five-year housing land supply at this time. Therefore the NPPF's 'tilted balance' is applicable (para 11d[ii]), which requires a presumption in favour of sustainable development with permission only being refused where *"any adverse impacts of doing so would significantly and demonstrably outweigh the benefits"*. This is a material planning consideration, which given the lack of any harmful impacts arising from the development proposals, strongly weighs in favour of the Planning Application being granted.
- 7.3 The site is sustainably located. The scale of development is consistent with the site's context. There is an identified local and District wide housing need.
- 7.4 The proposed physical changes to the site and existing building are minimal. There are no unacceptable impacts to the character and appearance of the area. The benefits of the planning proposal are not outweighed by the impacts, and therefore it is in this context that we consider the planning balance tilts in the applicant's favour. The proposal for 4 No. new dwellings on the site represents sustainable development in compliance with the National Planning Policy Framework.
- 7.5 The planning proposal would not cause demonstrable harm by way of increased noise and disturbance, or any other impacts to existing residents' amenities.
- 7.6 In summary, the proposal would constitute sustainable development, with compliance with the economic, social and environmental objectives of the NPPF. In

the absence of an up-to-date Local Plan and a lack of a deliverable 5YHLS, a presumption in favour of sustainable development should be applied. Therefore, as the proposal accords with the aims and objectives of national and local guidance, the application site is a suitable for the proposed development and permission should therefore be granted.

June 2026