



Planning / DAS Statement

Mill Cottage, Clymping Mill, Clymping, Littlehampton
BN17 5RN

Listed Building Application:

Internal and external alterations incl. reinstatement of angled fireplaces; replacement of Upvc windows with timber windows; alteration of window to door; formation of new door opening to exterior; internal partition to form ensuite and separate bathroom; new steps to entrance door; reinstatement of existing and new garden walls.



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1. Introduction

The Purpose of this Report

- 1.1 This Planning and Design & Access Statement was commissioned by Gary Love, the owner of the buildings and site comprising Clymping Mill to accompany an application for Listed Building Consent for alterations to Mill Cottage that is a lawful independent dwelling.
- 1.2 This is one of a number of applications that cumulatively form part of an overall masterplan which would see the refurbishment of restoration of the Mill House and adjoining flats, Mill Thatch and Mill Cottage, site improvements including the removal of two prefabricated buildings (including Mill Lodge which would be replaced with a more appropriate unit of accommodation) and the introduction of an outstanding bespoke floating pond-house.
- 1.3 A pre-application submission was made to Arun District Council on 10th April 2018, reference PAA/51/18 and some 13 weeks later, no formal response has been received. Therefore and in seeking to preserve and enhance the listed buildings including those that benefit from listing by virtue of having curtilage status, my client and I considered it expedient to prepare individual submissions. In doing so, the applicant/client will be able to progress a programme of works and a phased approach to the site as a whole with the ultimate aim of delivering the proposals as set out under references CM/33/17 and 34.
- 1.4 The intention is also to ensure that the applicant/client can safeguard the building and site from trespasses and thefts as well as working toward providing protection from the elements. It should be noted that an application has been lodged for security fencing around the perimeter of the site under reference PP-07046288 due to the lack of security and remoteness of the site. All but repairs have ceased on site and it remains vulnerable due to its remote location. An application for Listed Building Consent has already been lodged in respect of Mill Thatch (PP-07032473v1) on 24th June 2018.
- 1.5 It is reiterated that the overall aspirations for the site remain and are still achievable but in order to move forward, further submissions will follow as separate applications listed building consent and planning permission in a manner that is manageable for the applicant/client.
- 1.6 This application is accompanied by an 'Assessment of Significance', Photographs Records and a Preliminary Investigation of Damp, Decay and Defects by Hutton+Rostron.

- 1.7 It should be noted that as this application relates only to the works that require Listed Building Consent, the planning issues are to be addressed in a separate submission.

Background

- 1.8 Clymping Mill is a Grade II listed building. It was listed on 5th June 1958 and is referred to as follows:

"Originally a windmill, built in 1799. Smock type. Only the ground and first floors now remain, faced with flints and weather-boarding. The remainder was demolished in 1954. To the south was a mid-C19 mill-house. Two storeys. Four windows. Faced with cobbles with red brick dressings, quoins and flush stringcourse. Tiled roof. Glazing bars intact. In 1954 this was joined to the remains of the mill by a curved porch with one storey over. Architect Sir Richard Garton."

- 1.9 The listing covers the entire building including any object or structure fixed to that building in the list (s1(5)(a)); and any object or structure in the curtilage of that building at the time of listing or that existed on or before 1st July 1948
- 1.10 Mill Cottage, to an extent, shares a residential curtilage with the principle listed building but there are some clear divisions such as the wall that encircles the Mill House and excludes Mill Thatch and Mill Cottage, apart from those elevations that form the boundary. There is a pedestrian gate between the residential grounds to the south of Mill House providing access to the space between Mill Thatch and Mill Cottage, which as historic mapping indicates, was contained by the buildings themselves and walling¹.
- 1.11 The 'Assessment of Significance' indicates that Mill Cottage first appeared on OS mapping in 1875 but at that time it had a smaller footprint. It was noted that *"this would appear to accord to the extent of brick and flint detailing of the earliest range located to the east of the flint wall that divides the building. This suggests the building is contemporaneous to the Mill House and was subsequently extended both to the west and the south. The extensions appear to be of two dates, and likely include a significant element of rebuilding identified by the contrasting brick bonds that are evident; the lower sections of brickwork constructed in Flemish garden wall bond, also known as Sussex bond, whilst the upper section is in modern stretcher bond. To the north, it is abutted by the flint boundary wall. The east gable end is clad with dark weatherboard above the flint wall with red brick dressings that are characteristic of the local vernacular."*
- 1.12 Mill Cottage is also noted as having suffered from loss of character through the insertion of domestic features, including uPVC windows. The reconstructed brick range does not afford the same charm and appeal as the earlier brick and flint; and the expanse of brick, whilst a vernacular material does not provide the same pleasing palette of the earlier

¹ DGC Consultants Ltd 'Assessment of Significance' (June 2018) pp19-22 where a solid line denoted a

form. South of the brick range a traditional wall constructed in bungeroosh, a combination of brick, flint and stone bedded in lime mortar acts as retaining wall and provides the context of a former and historic yard enclosure which is encapsulated by Mill Thatch, Mill Cottage and the retaining wall. It is accepted that it retains sufficient architectural character and appearance to contribute positively to the aesthetic and contextual significance of the site.

- 1.13 Mill Cottage is recognised as a self contained residential unit of accommodation having been issued a Certificate of Lawfulness under reference CM/23/15/CLE that was issued on 22 January 2016. As planning permission is not required for a change of use, this application relates only to internal and external alterations.
- 1.14 Mill Cottage sits to the south west of the Mill and is a curtilage listed structure appearing on OS maps from 1875 and comprises a number of phases. It is a modest building of an angled L-shaped plan form. Amenity space is set to the south and east which is laid mainly to grass abutting more mature vegetation. There is evidence to suggest there was a door to the north elevation which would have provided access to the shared space between Mill Thatch, Mill Cottage and the Mill and Mill House.
- 1.15 The intention is that the listed building proposals will enable the viable use of the building as a lawful self contained dwelling respecting its character, appearance, fabric and setting, the setting of the parent listed building and other curtilage listed buildings and the site as a whole.

Aims

- 1.16 This Supporting Statement addresses the design and access issues as well as relevant planning policies relating to listed building matters, having regard to the requirements of Article 8 of the Town and Country Planning (Development Management Procedure) Order 2015. The details of the proposals will be described and appraised having regard to the following aspects:
- **Physical Context** – explains the physical context of the site and its surroundings;
 - **Planning Context** – the planning history of the site and broad policy requirements
 - **Use** – the purpose of the accommodation
 - **Amount** – the extent of development
 - **Scale** – the physical size of the development
 - **Layout** – the relationship of the building to neighbouring buildings;
 - **Appearance** – details of materials, style and impact upon the visual character and appearance of the subject building including setting;
 - **Landscape** – impact of the proposal on the existing landscape;
 - **Heritage** – consideration of the statutory requirement to preserve and/or enhance the historic building and its setting

- 1.15 As stated, an Assessment of Significance' has been prepared and will be cross-referenced to ensure that any unnecessary duplication is avoided.

2. Physical Context

- 2.1 Clymping Mill is an important historic structure located in a coastal position within proximity to Climping to the west and Littlehampton to the east. The property was Grade II listed in 1958 recognising the structure as a rare survival of a 'smock mill'.
- 2.2 The presence of a windmill on the site is understood to date back to at least 1378 when the site originally formed part of the Atherington Manor estate. By 1485 the site was called Tosham Mill and by 1780, Climping Mill or alternatively, Clymping Mill. The current structure has references to 1799 and by the 19th century was kept by the Barnard family with a steam engine added to the mill building to supplement the wind power by 1895.
- 2.3 The Mill has not functioned since approximately 1900 and for many years stood derelict before being converted to a residential dwelling with rooms contained within the body of the mill. The adjacent mill house had become two cottages by 1914 and by the 1920s had two dummy sails added. The structures of the windmill and mill house had also become amalgamated and in 1962 the windmill was reduced in height with removal of the cap, sweeps and upper storey.
- 2.4 At the time of converting the site to a residential use, the former agricultural buildings on the site were similarly converted. These works are considered to have been unsympathetic to the overall form of the buildings by inserting domestic features but nonetheless retain their simple form and appearance.
- 2.5 Along with changes to the buildings, the 1950s brought a change of use to the site whereby the property became a residential prep school and day school which operated until 1990. To support the educational use, six classrooms were added in the early 1980s. During the Following closure of the school, the site has returned to solely a residential use with the Mill House becoming the principle residence being used also for private educational tuition, courses and activities. The Mill House provides 10 – 11 bedrooms together with a number of reception areas and ancillary habitable spaces. This business ceased trading in 2015 and in 2016 under reference CM/23/15/CLE a Lawful development certificate for issued for 3 no. existing residential buildings – comprising The Mill, The Thatched Cottage and Mill Cottage.
- 2.6 In March 2017, the site was subject to a call from a private individual seeking crowd funding to reuse the site as an animal rescue sanctuary with the buildings restored

to provide a café, a venue to hire or an education centre together with an area for a possible yoga retreat. It was suggested that Mill Thatch could provide a holiday let. This bid was unsuccessful and the site was instead purchased by the current applicant.

- 2.7 The wider site of Clymping Mill extends over 1.6ha of land set within a rural location with proximity to the beach, golf course and agricultural land. Access to the site is taken via an extended driveway from Climping Street as it extends east towards the site culminating in a private drive and then hardstanding to the front of the Mill House.
- 2.8 The location of the site is not entirely devoid from connection to the public domain with public rights of way extending north-south and east-west in direct proximity and around the northern and eastern perimeter of the site. These provide links to the Climping and West Beach.
- 2.9 The site of Clymping Mill is located within designated countryside and also within a Strategic and Local Gap (Policy Areas 10 and 11). It is not subject to any landscape designations. A 'Site of Local Importance for Nature Conservation Area' is located to the east with land designated to the north east as a 'Priority Habitat for Coastal Sand Dunes '. Finally, the site whilst in a coastal location is identified as being at 'very low' risk from sea or fluvial flooding.
- 2.10 The site comprises a number of buildings reflecting past uses including residential, educational, agricultural and agri-industrial. Mill Cottage is another of those the buildings that had an agricultural origin but has been the subject of a succession of changes and eventual use for residential purposes.
- 2.11 The site presently has an unkempt appearance given the current condition of the buildings, with much of the site laid to grass or scrub. Works had commenced but apart from repairs has been halted. The buildings remain empty, at risk from repeated break-ins and damage and are exposed to the elements.

3. Planning Context

Relevant Planning History

- 3.1 The Mill lies within the administrative area of Arun District Council for planning purposes. An examination of the online planning register reveals the following planning history relating to this site with those in italics specifically relating to Mill Cottage:

- CM/24/81 – The erection of pre-fabricated block to provide 6 classrooms, staff room and male and female toilets. Permission granted 19.08.1981.
- CM/24/81B – The erection of pre-fabricated block to provide 6 classrooms, staff room and male and female toilets. Permission granted 05.10.1981.
- CM/8/85 – Conversion of flint/thatched barn to classroom. Permission granted 17.04.1985.
- CM/8/85B – Alterations to flint/thatched barn to form classroom. Permission granted 29.04.1985.
- CM/18/90 – Change of use of existing catering accommodation to licensed restaurant. Refused – 24.10.1990.
- CM/5/93 – Erection of single mobile unit to provide living accommodation for owner and family. Refused 07.07.1993.
- CM/19/96 – Re-siting and replacement of existing mobile home. Refused – 15.10.1996,
- CM/29/95/CLE – Application for a Certificate of Lawfulness for an Existing Use – use of land for the stationing of 1no mobile home. Certificate Issued 22.01.1996.
- CM/23/15/CLE – Lawful development certificate for 3no existing residential buildings – comprising The Mill, The Thatched Cottage and Mill Cottage. Issued 23.05.2016.

Legislative Context

- 3.2 As this application relates to listed building matters and works but internally and externally and setting, the policy context is limited to those topics and does not include planning matters such as ecology and flood risk.
- 3.3 Again, the 'Assessment of Significance' has set out the appropriate legislative framework set out in the Planning (Listed Buildings & Conservation Areas) Act 1990, s16(2) and 66(1). It should be borne in mind that s7 of the Act states that:

" ... no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised .."

3.4 Therefore, only those works that affect the 'character' of a listed building require consent. This can be interpreted as works that affect 'the special interest' of the building. However we have sought to address those works that would result in change to the internal and external character and appearance of the curtilage listed building and where its fabric would be altered. As a matter of course, we have included reference to the thatch even though its renovation is technically maintenance.

3.5 Sections 16(2) and 66(1) specifically require that attention should be paid to:

" ... development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

3.6 The Courts have held that this means an absence of harm and having regard to s7, an absence of harm to its 'character' meaning its 'special interest' and also 'significance' when having regard to the policy requirements of the NPPF. Therefore where change does not affect these attributes and in that regard preserves the building and its setting, consent should be forthcoming.

National Planning Policy Framework (2012)

3.7 Although a revised NPPF is to be issued in Autumn 2018, the current NPPF is referred to and has largely been added in the "Assessment of Significance." The Government's policy is provided in the National Planning Policy Framework (NPPF)² which promotes sustainable development through economic, social and environmental roles, the latter including the protection and enhancement of the historic environment. Core principles include making better use of existing resources, and conserving heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.

3.8 Paragraph 7 explains that sustainable development comprises three dimensions – economic, social and environmental roles. These dimensions will have pulls and tensions between them when the NPPF is taken as a whole. As the Framework is effectively policy, the statutory duties of Sections 66(1) of the 1990 Act must be addressed and be met. Paragraph 17 of the Framework sets out 12 core planning principles that planning ought to do and includes inter alia, being a creative exercise; improving places; identifying housing needs of an area; seeking high quality design and good amenity standards for all existing and future occupants;

² Communities and Local Government – *National Planning Policy Framework* – March 2012

taking account of local distinctiveness; supporting a low carbon future; contribute to conserving and enhancing the natural environment; effectively re-using brownfield land; and conserving heritage assets in a manner appropriate to their significance.

3.9 **Chapter 7 – Design:** Sets out the great importance that is placed on good design that is inextricably linked with sustainable development. It is highly important in this case due to the site's location within a conservation area and within the setting of heritage assets. Paragraph 56 states that '*Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.*' Paragraph 58 states that planning policies and decisions should aim to ensure that developments, inter alia, function well; add to the overall quality of the area; establish a strong sense of place; optimise the potential of the site to accommodate development; respond to local character and history; reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; create safe and accessible environments and design out crime.

3.10 At the same time, whilst it is proper to require developments to promote and reinforce local distinctiveness, this comes with the caveat under paragraph 60 for LPAs to avoid being prescriptive, not imposing a particular style or taste, not stifling innovation, originality or initiative through unsubstantiated requirements to confirm to certain development forms or style. The aim is high quality inclusive design that makes the connection '*between people and places and the integration of new development into the natural, built and historic environment*'.³

3.11 Section 12 of the NPPF, concerned with *Conserving and enhancing the historic environment*, expects applicants to understand the significance of heritage assets and local authorities, in considering change, to take account of several aspects, the main concern being:

'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation' (Para.131).

3.12 Any proposals causing harm to, or loss of, significance require a '*clear and convincing justification*' (Para.132). While substantial harm should be resisted, a lower level of harm would still have to be outweighed by public benefits to be acceptable (Para134).

³ National Planning Policy Framework (2012) paragraph 61

- 3.13 The National Planning Practice Guidance supports and explains the NPPF. More specifically, Historic England provides guidance on the assessment of significance⁴ and on development management.⁵
- 3.14 Other material guidance documents are referred to in the Assessment of Significance report and include Historic England Conservation Principles (2008); GPA Advice Notes GPA1 (Managing Change); GPA2 (Managing Significance) and GPA3 'Setting of heritage assets'.

Local Planning Policy Context

- 3.15 Local planning policy is contained in the Development Plan, which currently comprises the following documents:

- Arun District Local Plan 2003
- Modified Arun District Local Plan (January 2018 Consultation Document)
- Clymping Neighbourhood Plan 2015.

Arun District Local Plan 2003

- 3.16 The Arun District Local Plan 2003 sets out the spatial strategy for the District and whilst dated, the saved policies can be afforded weight according to their level of consistency with the various policies with the National Planning Policy Framework. The Local Plan is presently under review with provisions being made for its replacement. In the interim, the Saved Policies of the Local Plan remain the criteria for considering new development.
- 3.17 Relevant policies to the this Listed Building application include:
- GEN 7 – The Form of New Development
 - GEN22 – Buildings or Structures of Character
 - DEV12 – Protection and reinstatement of Original Features in Listed Buildings
- 3.18 Policy GEN7 (Form of New Development) requires, inter alia, that schemes must display a high quality design and layout, create an attractive places; make efficient use of the land, reflect the character of the area and enhance local distinctiveness, promote sustainable development, respect residential amenity.
- 3.19 Policy GEN22 (Buildings or Structures of Character) protects buildings or structures of interest and importance which are attractive in their own right. Alterations, extensions or other development is expected not to have an adverse impact on the appearance or setting of such buildings.

⁴ English Heritage – *Conservation Principles, Policies and Guidance* – 2008

⁵ Historic England – *Decision-taking in the Historic Environment* – 2015

- 3.20 Policy DEV12 seeks to encourage the reinstatement of original features and will grant consent for new or replacement doors, windows where necessary where replacement is justified.

Modified Arun District Local Plan (January 2018 Consultation Document)

- 3.21 The Council is in the process of producing a new Local Plan with the timetable for its completion and adoption currently under review. The policies of the new Local Plan represent the direction of travel for the Council and largely reflect the aims and intentions of adopted policies. The Consultation Document has been the subject of statutory consultation process and an Examination in Public with hearing sessions completed by 28th September 2017. The Inspector issued Interim Findings in October 2017. Hearing Sessions were resumed and Main Modifications were issued for consultation during Jan/Feb 2018. Following this stage and having responded to the Inspector's Interim Findings, the Inspector's Report is due in early July 2018. As a result and in noting the Post Hearing Main Modifications it is considered that the Policies in Arun Local Plan 2011-2031 (Publication Version, October 2014) carry a greater degree of material weight.

- 3.22 The Policies relevant to the subject matter of this Listed Building application include:

- SD SP1 - Sustainable Development
- D SP1 - Design
- HER SP1 - The Historic Environment
- DM1 - Listed Buildings

- 3.23 These policies seek to ensure that applications promote sustainability, are of a high quality design; respect the historic environment and protect listed buildings and their settings.

- 3.24 The Neighbourhood Area for Clymping Parish was designated on the 29 November 2012 for the purpose of preparing a Neighbourhood Plan. At this stage, a Pre-Submission Consultation document has been produced and therefore has limited weight prior to its adoption.

4. Details of the Proposal

- 4.1 This application proposes works to the curtilage listed building known as Mill Cottage. The majority of the works/alterations only require Listed Building Consent. Where works require planning permission, they will be presented in a separate planning application and it is under the auspices of the planning application that

those matters are to presented and assessed. Therefore this part of the Planning, Design & Access Statement breaks down the proposals considering how the proposals relate to the legislative, national and local planning policy requirements.

- 4.2 In summary, the proposal seeks to make improvements and alterations to the curtilage listed building referred as Mill Cottage. Although this application relates to only one building, consideration has also been given the impact on the character and appearance of the site as a whole which is also considered to represent the setting of the main listed building, Mill House and the curtilage listed building, Mill Thatch.
- 4.3 This application for Listed Building Consent represents the second of a series of applications that relate to the overarching vision for the site, which previously had been included in a combined application for Listed Building Consent and Planning Permission (CM/33/17 and 34/17/PL). The objectives of the applicant remain unchanged. A separate application has been lodged for Listed Building Consent in respect of proposed works to Mill Thatch. This will be followed by a joint planning application for those works that require planning permission for Mill Thatch and Mill Cottage. The financial implications and costs associated with separate submissions in this phased approach will form part of the justifications for the restoration and repair of the buildings on the entire site. And in that regard, the case for the proposed pond house remains part of the equation. As previously indicated by N.J.A Town Planning Ltd, this and other phases of the scheme form part of the equation when considering the investment required in the restoration of the buildings, their long-term viability and financial viability issues including the wider public benefits arising from the restoration of the heritage assets.
- 4.4 It is noted that all the buildings on site have been altered over time and have suffered due to a number of inappropriate alterations, repairs, vacancy and now exposure to the elements. The first priority for the site and buildings is obviously security and protection. The second priority is securing the actual buildings and providing protection from the elements. As stated, an application has been lodged for security fencing. The second priority is the restoration of the historic buildings on site. With reference to Mill Cottage, it is proposed to retain the existing use of the building as a single, independent residential dwelling, thus bringing back a property into full use and contributing towards the wider mix of properties throughout the District. As such, there is no change proposed to the Class C3 use and no change to the quantum of residential units on the site.
- 4.5 To achieve this objective, the building requires extensive repair and refurbishment therefore to understand the extent of the required works; the property has been

subject to a detailed survey which forms part of the supporting documents to this application.

- 4.6 The Hutton+Rostron report titled 'Preliminary Investigation of Damp, Decay and Related Building Defect Subsequent to Purchase' dated May-June 2017 noted the overall the building was structurally sound, in a reasonable condition but that there were signs of localized wet rot decay to windows and door timbers, to the roof structure especially at the eaves, valleys and gable ends.
- 4.7 There was evidence of chronic problems with infestation and decay to the sapwood band of roof timbers by wood boring beetle, especially woodworm. The timbers supporting the roof over the north-east wing appeared to be structurally decayed, and the roof may no longer be structurally stable. Some lintels appeared to have been replaced with concrete on previous refurbishment, and the lintel over the front door opening and the north-east window opening to the north-east wing no longer appeared to be structurally adequate. There appeared to be an original physical slate damp-proof course at the base of the walls. However, this had been bridged by raised ground levels locally, and by the replacement of original suspended floor structures with concrete screeds or slabs. This had allowed chronic moisture and salt penetration to the base of the walls and foundations. Timber windows had rotted in part and a number of windows had been replaced with uPVC windows which were beyond their useful lives.
- 4.8 It was noted that there was inadequate provision had been made for the extraction of moisture laden air or for 'background ventilation' on previous refurbishment. This was resulting in chronic problems with condensation and mould growth on current occupancy. The masonry walls including the flintwork were showing signs of degree and significant cracking particularly to the north-east elevation.
- 4.9 The north-east gable end had been clad with boarding. This had been decayed or partially decayed by wet rot, and was at the end of its useful life. Also The existing internal cladding to ceilings and walls appeared to be non-original, and had been extensively damaged by chronic problems with moisture and salt penetration. It also revealed that there was evidence of blocked up doorways and fireplaces, addition of fibreboard ceiling and skelings. A copy of this document is attached.

Proposed work to Mill Cottage

- 4.9 The intention is to restore but also to realise the potential of the building as a lawful unit of accommodation. Having regard to the requirements of NPPF, Policy DEV14 of the Local Plan, the building requires repair and renovation.
- 4.10 The proposed works seek to renovate Mill Thatch and bring it back into a viable residential use with two bedrooms, kitchen and living room. The Schedule of Impact

lists the work that is proposed on a room-by-room basis explaining and includes as Assessment of Impact. This document should be cross-referenced but

Internal

- removal of the roof including ceilings, soffits and ceilings allowing inspection of the structure and identify defects
- strengthening of the roof where indicated in Schedule of Impact, improving thermal efficiency and breathability. Reusing salvaged tiles and matching where additional are required. Dispose of concrete tiles
- replacement ceilings and skelings where required
- lay new concrete screed floor to various rooms with under floor heating
- replacement wall coverings and skirting boards where required
- reinstate sash window to east elevation (GF01)
- reinstate former door opening to north elevation (GF01)
- replacement of door to store (GF02)
- reinstate door between store (GF01) and living room (GF01)
- replace modern mock Georgian door to main entrance (GF03)
- reinstate timber partition between corridor and bedroom (GF04), form new opening to living room (GF01) blocking up existing
- reinstate angled fireplaces and surrounds (GF04 & GF05), new partitions and door opening to form dressing room and ensuite and separate family shower room
- removal of partitions between bathroom (GF07) and utility room (GF08) to form bedroom

External

- exposed brickwork walls to be covered in weatherboarding incorporating insulation, dark stain
- repairs to flint work as indicated
- removal of
- chimney stacks to be repaired as indicated
- replace all Upvc windows with new timber windows with casements to the west, south and north elevation; French doors to bedroom 1 (GF04)
- new stepped approach with raised terrace, steps and supporting wall faced with brick, flag stones to terrace with metal handrail
- accommodation of under stair/terrace crawl space accommodating housing for M&E plant
- French drain to the perimeter of the building
- new flint walls to north with gate to form separate garden for Mill Cottage

Note: All repairs are to be carried out on a like-for-like basis. Further details are included in the Schedule of Impact.

Proposed Use and Amount

- 4.11 Mill Cottage, a building of agricultural origins, is a residential building and its use as an independent dwelling has been established by a Certificate of Lawfulness. It will remain in residential use. There will be no increase in floor area and no expansion to the volume of the building. The space as it exists will be re-designated with minimal intervention and will include the reinstatement of the angled fireplaces. At the same time, the proposals would ensure the provision of improved accommodation with an improved flow of accommodation.
- 4.12 Although the space between Mill Thatch and Mill Cottage would be shared, the proposed garden to the north, accessed off the living room, would provide Mill Cottage with a dedicated amenity space.

Sustainable Development

- 4.13 By respecting the heritage value of the building and its significance through appropriate, measured and justified change, the future of the building can be sustained as part of the mill complex, as a home and therefore for future generations. This approach is considered to accord with the policy intent of the NPPF as set out in paragraph 7, 17 and Chapter 12. Paragraph 7 states describes the environmental role of sustainable development as:

'contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon technology'.

- 4.14 In particular attention is drawn to paragraph 126 which clearly states LPAs should take into account:
- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - *opportunities to draw on the contribution made by the historic environment to the character of a place*
- 4.15 These four bullet points are effectively the essence of this proposal and the sustainable approach to the individual building and the complex as a whole. Paragraph 131 reinforces this LPA role and it is clear that the quantum of change is sufficient, appropriate and necessary to ensure the building is sustained and its

significance enhanced. At the same time, the proposals seek to reverse alterations and interjections that fail to respect the character and distinctiveness of the building.

4.16 The NPPF supports the reuse of buildings in the countryside but in this case, it is not a new use – it is a revitalisation of an existing building and its lawful use. Therefore the policy support at both local and national level exists provided that the statutory duties are met and policy requirements to protect and enhance listed buildings. It also releases a renovated home back into the housing supply as it is a lawful dwelling in its own right and should not be disregarded if the applicant chooses to accommodate the extended family. This is of particular importance given that Arun District Council have not been able to demonstrate the availability of a 5YHLS – a material planning matter which will be the subject matter of further phased submissions.

4.17 The proposed works would also ensure that the property meets the required levels of energy efficiency and will seek to reduce water consumption through use of appropriate measures both within the systems and fittings and will sustainably source materials where appropriate.

Viable use of a heritage asset

4.18 The NPPF sets out that there should be '*a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats*'. It is also required that heritage assets should be recognised as 'an irreplaceable resource' and that these should be conserved in a manner appropriate to their significance.

4.19 The NPPF requires that applications for listed buildings '*contain sufficient information to enable an assessment of the likely impact of the proposals on the special architectural or historic interest of the building or its setting*'. To respond to this requirement this application for listed building consent has been informed by an Assessment of Significance which provides an appropriate assessment of Mill Cottage, its setting and relationship with other heritage assets and their respective settings. This level of detail is proportionate to the importance of the heritage assets' and has been deemed necessary to '*understand the potential impact of the proposal*' on this significance. The results of this assessment of significance accompany the application thus ensures accordance with paragraph 128 of the NPPF as well as Local Plan Saved Policy DEV14 which additionally seeks to ensure the long term preservation and enhancement of listed buildings and their setting.

4.20 The alterations, repairs and refurbishment of Mill Thatch adopt a sensitive approach to ensure that its significance and special interest are respected including the retention of historic fabric, removing modern inappropriate fabric including plastic

window. At the same time, the proposals ensure that the proposals making optimal and viable uses of the building along with a sensitive approach to the heritage asset.

Layout, design and appearance

- 4.21 The NPPF sets out that the Government attaches great importance to the design of the built environment (paragraph 56) and additionally to having respect to the setting of heritage assets.
- 4.22 Given the status of the building as a listed building, it is necessary to ensure that alterations to the building are sensitively designed and retain or emphasise the qualities of the original building as required by Policy DEV14.
- 4.23 As stated above, the internal alterations allow for the provision of a suitable standard of accommodation without any enlargement or additions to the building. The internal plan form would be readable and would be capable of being interpreted, including the phases of change.
- 4.24 The external steps and terrace would ensure that a safer approach is provided to the entrance door. As an alternative the garden entrance to the living room would provide a level entry to the ground floor. The wall would be constructed to match the existing low height flint wall and would therefore be in keeping with this sensitive setting.
- 4.25 The works to create the resultant properties would be undertaken in conjunction with the refurbishment of the building using traditional materials and methods of construction to ensure that the workmanship is appropriate to the long-term protection of the building as a heritage asset. This would also rectify past works, which have not been sympathetic to the special character and construction of the building. The result would be a property that would be in a good state of repair for the long term and therefore be in the wider public interest as required by the NPPF.
- 4.26 The proposed alterations would complement the overall restoration works to facilitate the continued residential use. The flint work to the elevations would be retained and repaired. Due to the nature of construction and lack of insulation, the brick elevations would be covered with dark stained weatherboarding with insulation behind. The appearance of the building would change but this needs to be seen as part of the holistic approach to improve the performance of the building.
- 4.27 Together with the improvements to the windows, it is considered that the scale and form of the existing building, and its resultant appearance would be appropriate for its continued residential use. The visual simplicity of this curtilage outbuilding would remain appropriate to this rural setting. There would be no alteration to the layout

of the property in how it relates to The Mill. This is confirmed through a supporting Assessment of Significance which accompanies the application. From the exterior the restoration and introduction of more appropriate timber windows would improve the appearance of the building from various vantage points and how it appears in the historic landscape and its historic setting

Materials and finishes

- 4.26 As noted above, the brick elevations would be clad in dark stained weatherboarding. UPVC windows would be replaced with more appropriate timber windows. The flint work to the respective elevations would be retained and the new garden wall would match the existing. Internal finishes have been detailed in the Schedule of Impact. Overall the proposals would see an improvement in the internal finishes and external appearance that respect the historic form, fabric, character and appearance of this curtilage listed building.

5. Conclusion

- 5.1 This application for listed building consent for alterations to Mill Cottage represents part of phased approach to the restoration and renovation of the Clymping Mill site and its heritage assets. It was concluded that and in light of the bureaucratic delays experienced thus far that a phased approach would enable work to progress in a meaningful manner. At present, the work has now been restricted to localised repairs. This proposal is not without financial outlay and this is a factor that must be taken into account when considering the masterplan for the site and it's buildings – existing and proposed as a whole. An important part of the masterplan will be the Pond House which is required to offset the increasing financial outlay, facilitate the repairs and renovation works to the heritage assets and at the same time, provide for wider public benefits as the works progress and the mill is restored with its sails. The reinstatement of the main body of the Mill and its sails will bring back the landmark that once existed and a part of Clymping's history.
- 5.2 Overall the proposed works would respect the character, appearance, plan form and historic fabric of the curtilage listed Mill Cottage and it's setting. Its resultant appearance would respect the setting of the parent listed building and Mill Thatch in this rural environment.
- 5.3 Overall it is considered that the proposals would reverse the harm that has been caused in the past. As such the impact on the heritage asset/s would be neutral no and without harm Therefore the proposals would accord with the legislative

requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, in particular s16 and 66, the NPPF, saved and emerging local plan policies.

- 5.4 Having regard to the current state of this building, its vulnerability and the threat of the heritage assets, and the fact that the proposal marks the most positive and sustainable approach to Mill Cottage, the grant of consent should be supported and a positive decision issued without delay.