



Planning / DAS Statement

Mill Thatch, Clymping Mill, Clymping, Littlehampton BN17 5RN

Listed Building Application:

Proposed internal & external alterations incl. reinstatement of former & alteration of existing openings, alteration removal of modern infilling, removal of modern infilling & internal blockwork, new internal door opening & partition; stair access to attic with enlargement of attic aperture; restoration of thatch; decking to west elevation.



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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 Thatch 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 10 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.
- 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 a 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 Thatch, 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 indicated, was contained on by the buildings themselves and walling¹.
- 1.11 The 'Assessment of Significance' adequately describes Mill Thatch:

*" a modest, single-storey utilitarian structure which has been substantially altered with inserted fenestration, including casement windows and a full height glazed door to the north elevation whilst the open bay timber -frame arrangement of the west elevation has been infilled with casement windows and flintwork bedded in cementitious mortar. The barn has been in residential occupancy for some years and this is reflected in the domestic character of the North and West elevations, which has undermined its agricultural character. The alterations may have impacted upon the historic form and context however this has not been entirely eroded by the modern interventions. The barn continues to make a valuable contribution to the aesthetic and historic context of the building group and the setting of Clymping Mill ... "*²

- 1.12 Mill Thatch 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.
- 1.13 Mill Thatch sits to the south of the Mill and is a curtilage listed structure appearing on OS

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

² DGC Consultants Ltd *ibid*, p 27

maps from 1875 and is formed by two attached buildings with no internal link. The building is modest in size, single storey and provided two bedrooms. Amenity space is set to the south and west which is laid mainly to grass abutting more mature vegetation.

- 1.14 The intention is that the listed building proposals will enable the viable use of the building as a 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

- 1.15 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 in paragraph 1.11, 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 Thatch is one of the buildings that had an agricultural origin but has been the subject of a succession of changes arising from its use predominantly 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.
- 2.12 Mill Thatch is as the name suggested, a thatched building. It is of a single storey with hipped roofs at both ends. The southern roof slope sees a dormer window, which sits over what was a door opening to the ground floor and door opening above. The door opening directly under the gabled dormer provided access to a loft storage space. Today, that door to the ground floor is now shown as a three-light window with flint work above. The building was originally of 4 bays with a further 2 bays added at a later date. Originally a timber framed construction it was encased in coursed flint cobbles. The 4-bays to the older section were fully open to the ground but some were adapted with the introduction of a mid rail and infilled with flint laid in a more cementitious mortar.

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 Thatch:

- 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)³ 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;

³ 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*'.⁴

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).

⁴ 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 significance⁵ and on development management.⁶

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 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 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.

⁵ English Heritage – *Conservation Principles, Policies and Guidance* – 2008

⁶ 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 Thatch. 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 be 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 to as Mill Thatch. Although this application relates to only one building, consideration has also been given to 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 Cottage.
- 4.3 This application for Listed Building Consent represents the first 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. Therefore a separate application will be lodged for Listed Building Consent in respect of proposed works to Mill Cottage. 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.

Proposed work to Mill Thatch

- 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 Hutton+Rostron report titled 'Preliminary Investigation of Damp, Decay and Related Building Defect Subsequent to Purchase of the Thatched Cottage or Barn at The Mill, Climping Street, Climping, Littlehampton' dated May-June 2017 noted the overall the building was structurally sound, in a reasonable condition and although at the end of its life, the thatched roof was still performing the function of keeping rainwater out. There is some evidence of wet rot decay to window and door frames.
- 4.5 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 Thatch, 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. It is also requires the removal inappropriate windows and doors and inappropriate walling – internally and externally due to being covered with non-breathable paint. Original timber posts were also affected. The flint external coat is just that - a coat added to the building, in part sitting beyond the exposed rafter feet and edges of the thatch. Some upright posts can still be seen embedded in the flint and cementitious mortar and are suffering from infestation and decay. Many of the windows are uPVC and at the end of their useful lives. Perhaps due to lack of use, ventilation and condensation are issues but ironically with windows being broken air flow has been provided. The building does have a damp proof membrane to the floor. A copy of this document is attached.

4.6 The Assessment of Significance indicates that:

"The building is modest in scale and form using materials and finishes that are indicative of the local vernacular. It is an attractive building however it has been marred by modern interventions implemented at the time the barn was converted to residential use.

Mill Thatch has also suffered considerable degradation of the facades including the thatched roof all of which impacts upon the contribution the building makes to setting."

4.7 The assessment also notes that Mill Thatch was extended by one bay to the south that incorporated a loft storage area with a loading door housed within then dormer to the southern roof slope. The original flint cobbled wall is internalised.

4.8 In summary the proposed works seek to renovate Mill Thatch and bring it back into a viable residential use with one bedroom, bathroom, an open plan kitchen/living/ dining area; access to the existing attic space.

- restoring the thatched roof
- removing the offending Upvc windows and modern timber windows/doors, replacement with timber units
- removing modern blockwork to the interior walls
- new dpm floor
- new doorway opening between the existing spaces;
- new partitions to form a bathroom
- battening and counter battening to internal walls to open plan living space
- plaster lining to modern walls of bedroom
- removal of former internal partitions

- removing of the modern flint infill between the posts and introduction of 4 no. glazed screens, two being bi-folds
- suspended log burner with flue
- paddle stair ladder to loft area with safety glass to void in existing repaired boarded screen
- new roof collars at every fourth rafter
- replacement of window and door to north elevation
- replacement of windows to lower and upper levels to south elevation
- French drain around perimeter of building
- timber decking to exterior to west side

4.9 The coursed cobbled flintwork is a 'new' skin but it is not known when this added. As a significant percentage of the former timber frame has been lost or has rotted, it would be illogical and incorrect to attempt to reinstate that 'original' frame. The proposals would however go some way to reinstating sense of openness by removing the modern flint infilling between the posts and braces with glazing behind. The formation of a new opening between the original bays and added southern bay enables the provision of an improved internal arrangement and internal flow connecting the spaces as well as providing a suitable bedroom and bathroom. The loft storage area would become more accessible and provide much needed functional space.

4.10 Although the space between Mill Thatch and Mill Cottage would be shared, a decked area is proposed to run along the west side of Mill Thatch which would also act as a dedicated amenity space. Due to ground levels the decking would provide a level surface without steps across the western side of the building. It will enable the main living space to have a greater connection with the outdoor space.

Proposed Use and Amount

4.11 Mill Thatch, 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 has been re-designated with minimal intervention. At the same time, the proposals would ensure the provision of improved accommodation whereby the southern bay would be connected internally to create a better flow of accommodation. The changes proposed are focused with the aim of using that which exists and working within the existing volume. As it stands the changes to the exterior with the glazing to the former open bays will create a sense of space and greater connection with the external space.

Sustainable Development

4.12 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'.

4.13 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*

4.14 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.

4.15 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 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.

- 4.16 These 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

- 4.17 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.
- 4.18 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 Thatch Mill, 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.
- 4.19 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

- 4.20 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.
- 4.21 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.

- 4.22 The removal of former partitions that did not respect the internal plan form have allowed for a simple yet effective internal layout influenced by the historic form and its evolution over time. The volume of the building remains unaltered. However, reading the historic form has enabled the internal space to be revisited and simplified to maximise the internal potential and provision of upgraded accommodation. The external deck is both practical and functional, addressing issues with land levels but also enabling direct level access for the internal open plan living area to the exterior amenity area.
- 4.23 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.
- 4.24 The proposed alterations would complement the overall restoration works to facilitate the continued residential use. From the exterior the restoration of the that 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. The removal of modern flint infill would enable the original open bays to be reinstated and improve the appearance of the building as well as its internal spatial quality. The resultant scale, form and appearance of the building would be appropriate for its continued residential use. They would retain the visual simplicity of this curtilage outbuilding to ensure it remains 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.

Materials and finishes

- 4.25 Although the introduction of full height glass panels and bi-folds to the re-opened bays would appear contemporary, it is considered to be discreet and respectful of the tradition appearance, better revealing the historic post and brace arrangement. Where repairs are proposed the materials and detailing will respect the historic fabric.

5. Conclusion

- 5.1 This application for listed building consent for alterations to Mill Thatch 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 which 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 building – existing and proposed as a whole. An important part of the masterplan will be the Pond House to offset the 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.
- 5.2 Overall the proposed works would respect the character, appearance, plan form and historic fabric of the curtilage listed Mill Thatch and it's setting. Its resultant appearance would respect the setting of the parent listed building and Mill Cottage and their rural setting.
- 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 Thatch, the grant of consent should be supported and a positive decision issued without delay.