

Supporting Statement for Applications
[refs. DM/25/2654 and 2655]
Wykehurst House, nr Bolney RH17 5QQ



Rev B 14.04.2026

Introduction

Our submission included a Heritage Statement, including a broad 'Assessment of Significance' for the proposed alterations. Importantly, our assessment that the special interest of the building, in architectural terms, lies principally in its surviving original design, construction and fabric, is agreed. Therefore, later fabric and alterations are of less interest, or are detrimental to the significance of the house. This supplemental statement seeks to provide more detailed comment and assessment of impacts relative to those significant surviving parts of the building only.

The Conservation Officer has requested further information, to enable their assessment of the proposals in the following categories. For each item, we have copied the information request and provided our detailed response below. These can be read with the attached documents which are cross-referenced in the text below.

Replacement windows

Information request:

Although we have detailed drawings indicating that the windows have been replaced like-for-like, we do not have a condition report to justify the loss of the previous, presumably original windows, or elevations to show their locations.

Agent response:

We have indicated window locations in plan and detailed elevations of the windows themselves. To supplement this information, we now include photographs of the exterior, highlighting the locations.

We also attach photographs of original window locations; at the time the building was acquired. Although we do not have records of every window (due to repairs being initiated prior to our engagement) the images show that many window frames had already been removed, with simple softwood frames being installed to support polycarbonate sheeting (inside and out) for basic, but insufficient, weather protection.

Our client states that in-situ windows were repaired and new windows, crafted to match the originals, were installed where frames were missing. They considered this a necessity for weather protection and noted that the window repairs offered better value than full replacement. Although we do not have historic record of the original windows, we are inclined to accept this explanation, due to the photographic evidence and our client's general philosophy of preservation, as observed in other window repairs and to the original internal door joinery generally.

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Type 2 -
W2.07

Type 1 -
W2.08

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Type 1 - W2.08	Type 2 - W2.07	Type 2 - W2.06	Type 2 - W2.05	Type 1 - W2.04	Type 2 - W2.03	Type 2 - W2.01
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Photo taken from prior to client's acquisition shows the damaged second floor windows generally.

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Type 1 - W2.08 with complete loss of original frames, cill, glazing and damage to central mullion



Type 2 - W2.01 with loss of glazing and polycarbonate sheeting both sides



Type 1 – W2.04 with missing frame / glass



Type 2 – W2.06 with missing frame etc

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Replumbing throughout

Information request:

The submitted email from Mittens Plumbing and the accompanying Water Services plans are not sufficient for a full understanding of the work which has been undertaken, the justification for it, or its potential impact on historic fabric (it is understood that this aspect of the proposal is retrospective).

A more detailed condition report of the previously existing water system should be provided, alongside a detailed schedule of the new work which has been undertaken. Separate existing and proposed plans should be provided- it is not clear which we currently have in front of us, and no indication of changes to pipe routes etc. is given. The Heritage Statement should be expanded to give a more detailed consideration of the impact on the historic fabric of this work.

Agent response:

In answering the above request, we feel it first helpful to re-iterate our overview of significant alterations made to the property since its first construction. The 1970s conversion to flats introduced many new bathrooms and kitchens, significantly increasing the need for pipework supplies and waste runs in the building, and hybrid (mixed material) pipework installation. The Golestan family added further bathrooms and generated further pipework demand, during their ownership.

The plans provided illustrate an entirely new servicing infrastructure for the building, using floor / ceiling voids in the deep timber floor construction of the home. The reasons for replacement are explained below.

The original, historically significant house design was very well considered in ALL aspects with high quality craftsmanship and materials used. A double-skin masonry wall, acted as a spine throughout the house, accommodating three principal cast iron drainage stacks and lead rainwater pipes from the central roof valleys. This 'servicing' void also accommodated hot air ducting to the principal ground floor reception rooms and the entrance hall.

The ground floor was originally heated using warmed air, supplied by a basement boiler room. The limited bathroom and WC provision was mainly located on upper floor levels, connected to the three stack locations mentioned above. Each stack ran down to the basement level, where rodding eyes were (are still) located in the central corridor, to allow rodding and maintenance of the pipes from within the building's interior. These stacks remain in the current building, although many branches into these stacks have been removed over time; not least those bathrooms located at the back of the original first to second floor staircase, long since removed to create the current 'atrium' space.

When examining the changes to the original layout (as presumed from 1920's sales particulars and historic plans) when compared with the layout at the time of acquisition, we see that the three original drainage stacks were no longer well positioned or of sufficient capacity to serve the increased demand from newly created wet areas. New pipework was installed generally at the time of this conversion and much of this was of poor quality and compromised the original design quality. We include some additional photographs below to illustrate this point, to be read in conjunction with the services consultant statement below.

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Additionally, we have created a supplemental drawing which illustrates original 'wet area' locations and the three main stacks serving them, compared with the 'wet areas' formed in the 1970's to 90's. This illustrates the points made above.

The new proposals generally work with bathroom locations, as inherited following the conversion to flats, and therefore does not seek significant new routing. Instead, the proposals remove pipework installations from the 1970s to 90s and reinstate these with new installations, constructed to contemporary building standards.

We consider that the installations are of better quality and will provide a more viable and sustainable servicing infrastructure for the building into its future.

Our inspecting services consultant has provided the following additional statements which offer more detailed assessment of the original condition of water systems generally and an assessment of the impact of proposed alterations on the historic fabric:

1. Condition of the Previously Existing Water System (Justification for Replacement)

Prior to commencement of works, a detailed inspection of the existing plumbing system was undertaken. The system was found to be **not fit for purpose**, unsafe, and incapable of being economically or responsibly repaired. Key issues included:

- Extensive use of aged and degraded pipework, including mixed materials (galvanised steel, early copper, plastic repairs) with evidence of internal corrosion, restricted bore, and active leakage.
- Numerous unauthorised historic alterations and ad-hoc repairs, including redundant pipe runs left live, dead legs, and non-compliant joints.
- Pipe routes running through sensitive areas without appropriate protection, fixings, or isolation, presenting a continued risk to historic fabric through leakage or failure.
- Absence of modern isolation, zoning, or pressure control, meaning even minor failures would require invasive intervention to historic finishes.
- The system did not comply with current Water Regulations, good practice, or modern safeguarding standards expected within a listed building and a real concern of legionnaires within servicing pipe work.

Given the above, retention of the existing system with multiple storage tanks and cylinders positioned around the property would have presented an ongoing and unacceptable risk to the historic building, and partial repair would have resulted in continued disturbance over time. Full replacement was therefore considered the least harmful and most sustainable intervention with all domestic stored water and hot water cylinders being positioned in the basement of the building.

2. Schedule of New Works Undertaken

The new plumbing installation was designed and executed with conservation principles at the forefront. Works undertaken include:

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- Full removal and decommissioning of the unsafe existing water distribution system.
- Installation of a new, fully compliant cold and hot water system, designed to current standards.
- Rationalisation of pipe routes to reduce overall pipe length, eliminate dead legs, and concentrate services within previously disturbed zones wherever possible.
- Introduction of appropriate isolation points to minimise future intervention.
- All works carried out with a focus on reversibility, minimal intervention, and protection of historic fabric.

3. Impact on Historic Fabric and Heritage Considerations

The plumbing works to be undertaken with a clear objective to minimise impact on historic fabric. Specific mitigation measures included:

- Re-use of existing penetrations and service routes wherever feasible.
- Avoidance of decorative plaster, panelling, joinery, and masonry of heritage value.
- Any required penetrations were limited in size, carefully executed, and located within previously disturbed or low-significance areas.
- No historic fabric of special architectural or historic interest was removed or lost as a result of the works.

The intention of the intervention was not enhancement for convenience, but risk reduction and long-term protection of the listed building, by preventing uncontrolled water damage — one of the most significant threats to historic structures.

4. Conclusion

In summary, the replacement of the plumbing system was unavoidable, proportionate, and undertaken in the best interests of the listed building. The works reduce the risk of future damage, limit ongoing intervention, and provide a compliant, maintainable system appropriate for the long-term conservation of the property.

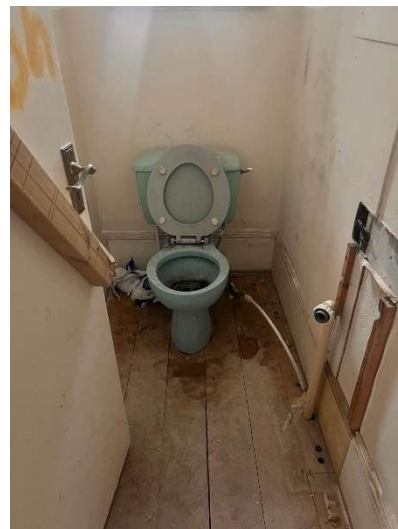
(Please also refer to the sections below, which interlink with this item, and include assessment of the impact on existing timber floors generally).



Modern plasterboard ceiling with new pipework run in void above.



Modern, harmful pipework addition



Examples of 70s plumbing additions including supplies and drainage tracking around rooms and penetrations through fabric.

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Photographs showing new de-centralised heating systems (tank and cylinder) concealed in newly formed voids, over modern joisted ceilings.

New heating

Information request:

Further information is required to describe the proposals in this respect, including more detailed existing and proposed plans highlighting any new work, and a detailed schedule of works. A more detailed consideration of the impact on historic fabric should also be provided.

Agent response:

Please read our general response above, to the section 'Replumbing throughout', which speaks to a broader consideration of changes in the servicing infrastructure of the building. We include mention of the original heating system for the preserved ground floor reception rooms and entrance hall, which utilised a novel ducted warm air system, serviced from the basement boiler room below.

For the converted upper floor flats, multiple hot water heating systems were installed, with boilers, cylinders and feeder tanks newly positioned in various locations throughout the house. Generally, these installations were harmful to the integrity of the original house design.

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The new heating strategy is informed by the following key principals:

- More efficient primary energy solutions are sought for the supply of the house.
- The house is returned to a single-family house using a centralised controllable system.
- Existing systems are either obsolete or no longer fit for the proposed purpose.
- Historically significant (original) heating grilles are preserved.

Expanding on each principal:

The desire to adopt more efficient primary energy sources is in the interest of environmental and monetary cost. A new infrastructure intends to harness multiple energy sources, including renewable energy, but also be adaptable to new technologies which drive continual efficiency (see our separate planning submission for the proposed external plant area).

As with the 1970s to 90s plumbing work, described above, the heating systems introduced for upper floor apartments were also not considered fit for purpose. The quality of this installation and the applicable standards of that period is an ongoing concern to this assessment, but here also is a point of principal - the de-centralised systems cannot be centrally supplied and controlled, and are not adaptable for integration of the more energy efficient, future-forward supplies described above.

The original, novel warm air ducting system is no longer fit for purpose. We include below a statement from the service consultant in this regard, which describes the original system in relation to modern standards and regulation. This has led to the need to generate a new heating solution which offers least impact on the historic building features.

This said, the original ducts are integral to the existing building fabric and remain, in-situ. We include photographs below which show the preserved grill locations in the principal reception areas (only the entrance hall being the original craftwork).

Generally, the above considerations have led to a preferred heating strategy outlined as follows:

- Hot water fed trench heaters set into the existing floors, to all principal rooms at ground floor and first floor bedrooms (Refer also to the section below for greater detail).
- Floor standing cast iron radiators to first floor corridors (as details below).
- Conventional radiators to second floor, replacing similar pre-existing non-original radiators.
Note: generally, radiator sizes have increased in depth, as a result of contemporary heat load modelling.
- Conditioned warm / cool air system to kitchen only.

The latter solution, for the kitchen, is a slight anomaly, due to the proposed kitchen units occupying the perimeter of the room's floor area and the opportunity of the new ceiling and roof void over. The current ceiling has no historic significance materially but does re-establish and define the original room proportions. We therefore consider the introduction of ceiling grilles, flush mounted into the new ceiling of the kitchen, as generating less than substantial harm to the building.

The submitted proposal drawings show all the above new servicing infrastructure and the location of fittings.

Generally, we find that the floors of the building have been significantly altered throughout the entirety of the building. This has been due to historic alteration through conversion and the repair of floors following significant water ingress and neglect, particularly over the 26-year period of vacancy leading to the condemning of the building, prior to its 'salvation' in the 1970s.

We therefore find that the lifting and replacement of timber floorboards, for the routing of new cabling and pipework in the floor depth will cause less than substantial harm to the historic building fabric and is weighed against alternate options such as running under or over floors, which would impact floor and ceiling levels and their adjoining features such as cornicing, skirtings and door thresholds. Or the chasing of walls to bury pipework within the historic fabric.

Our inspecting services consultant has provided the following additional statements which offer more detailed assessment of the heating requirement generally and an assessment of the impact of proposed alterations on the historic fabric:

1. Heat Loss Assessment and Building Heating Requirement

A full, room-by-room heat loss calculation was undertaken for the entire building to establish its actual thermal demand. This assessment confirmed a peak design heat loss of approximately 410 kW, reflecting the scale, age, construction type, and exposure of the listed structure.

The calculated demand demonstrated that the previously existing heating arrangements were fundamentally inadequate for the building and incapable of providing reliable, controllable, or efficient heating in line with modern expectations, occupant comfort.

2. Condition and Suitability of the Previously Existing Heating System

The existing heating system was found to be obsolete, fragmented, and beyond economic or practical repair, with the following principal issues identified:

- The ground floor heating was served by a warm air system in excess of 40 years old, with obsolete components, degraded ductwork, poor efficiency, and no realistic availability of replacement parts.
- The primary heat source was an oil-fired boiler located within the basement, which had not been operational for many years.
- On inspection, the oil boiler was found to be past repair, non-compliant with modern safety and efficiency standards, and unsuitable for recommissioning.
- The system as a whole offered no zoning, limited control, poor distribution, and could not respond to the building's varied heat loss characteristics.
- Continued reliance on the existing system would have required repeated invasive intervention, with a high risk of failure and consequential damage to the historic fabric.

In summary, the novel warm air ducting system is no longer fit for purpose as it does not meet the functional, safety, or performance requirements of the building and could not be retained in any responsible or sustainable manner.

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3. Design Rationale for the New Heating Strategy

Given the building's scale, heat loss, and listed status, a hybrid and pragmatic heating strategy was developed to balance:

- Technical feasibility
- Sustainability objectives
- Long-term running costs
- Protection of historic fabric
- Fire and environmental risk reduction

The adopted solution comprises:

- Air Source Heat Pumps forming a key part of the low-carbon heating strategy, providing efficient base-load heating where appropriate.
- A radiator and trench heating distribution system, selected to suit the architectural constraints and heat loss characteristics of individual spaces.
- Oil-fired boilers retained as part of the overall system strategy, but critically relocated to an external plant arrangement, entirely outside the historic building envelope.

This approach allows the building to be heated effectively while transitioning toward lower-carbon technologies, without imposing inappropriate system demands or excessive intervention.

4. Externalisation of Oil-Fired Equipment and Fire Risk Reduction

A key design decision was the complete removal of oil storage and oil-fired plant from within the building. This was undertaken specifically to:

- Eliminate the fire risk associated with internal oil storage in a listed structure.
- Remove the risk of fuel leakage within the building fabric.
- Avoid the need for intrusive containment measures internally.
- Improve access for maintenance without disturbing historic spaces.

By relocating oil storage and boilers externally, the scheme significantly improves building safety while reducing the long-term risk profile of the property.

5. Impact on Historic Fabric and Heritage Considerations

The heating system design and installation were undertaken with conservation principles at the forefront:

- Existing service routes and previously disturbed areas were reused wherever possible.
- New pipework and emitters were carefully coordinated to avoid decorative plasterwork, panelling, joinery, and significant historic features.
- Trench heaters and radiators are selected and positioned to minimise visual impact and avoid structural alteration.

The intervention is considered necessary, proportionate, and reversible, and represents the least harmful means of providing a safe and functional heating system to a building of this nature.

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6. Sustainability, Efficiency, and Long-Term Building Protection

The new heating strategy delivers substantial benefits, including:

- Improved energy efficiency relative to the historic system.
- Reduced reliance on fossil fuels through the use of air source heat pumps.
- Improved controllability and zoning, reducing overheating and thermal stress on historic fabric.
- Lower long-term running costs and improved operational resilience.
- A significant reduction in the risk of catastrophic heating or fuel-related failure.

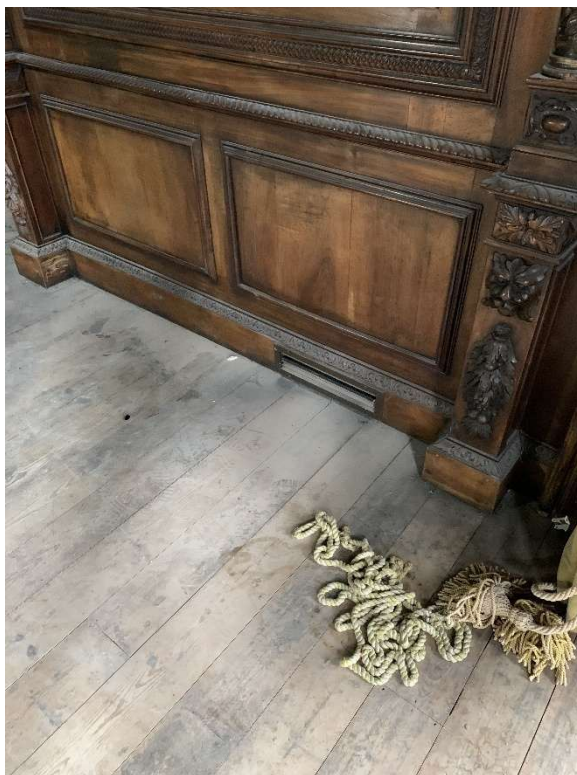
Importantly, the system protects the building by ensuring consistent, controllable heating, reducing condensation, thermal shock, and fabric degradation.

7. Conclusion

The heating works were unavoidable and undertaken to ensure the long-term viability, safety, and conservation of the listed building. The previous system was obsolete and beyond repair, while the new strategy delivers a carefully balanced solution that respects the historic fabric, improves sustainability, and significantly reduces risk.



Proposed floor standing cast iron radiator



Non-original grille, connected to the duct system

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Retained existing stone grilles in the entrance hallway

Underfloor heating

Information request:

The information in this respect is inadequate. There is no indication of whether this work has already been undertaken or not. There is no detail beyond what appear to be plans of feeder pipes(?) at basement and ground floors of the extent or nature of the system, its relationship with the existing floor structures/finishes, or the extent of any impact on historic fabric. More detailed plans, including room plans and typical sectional details, should be provided, alongside a detailed methodology and impact statement.

Agent response:

We confirm that floor recessed trench heaters have NOT been installed and that this remains a proposal for officer consideration. In the section above, describing 'New Heating' generally, we outline the case for using trench heaters and that this is considered the least harmful method of introducing new heating sources into the 'principal' rooms – these being the rooms where much of the original design intent and detail is preserved, and are therefore also of greatest historic significance.

The reason for the proposed change in heating system is (1) to replace now obsolete systems and (2) to create a new centralised and controllable system, which also benefits from renewable energy sources for the long-term sustainability of the house.

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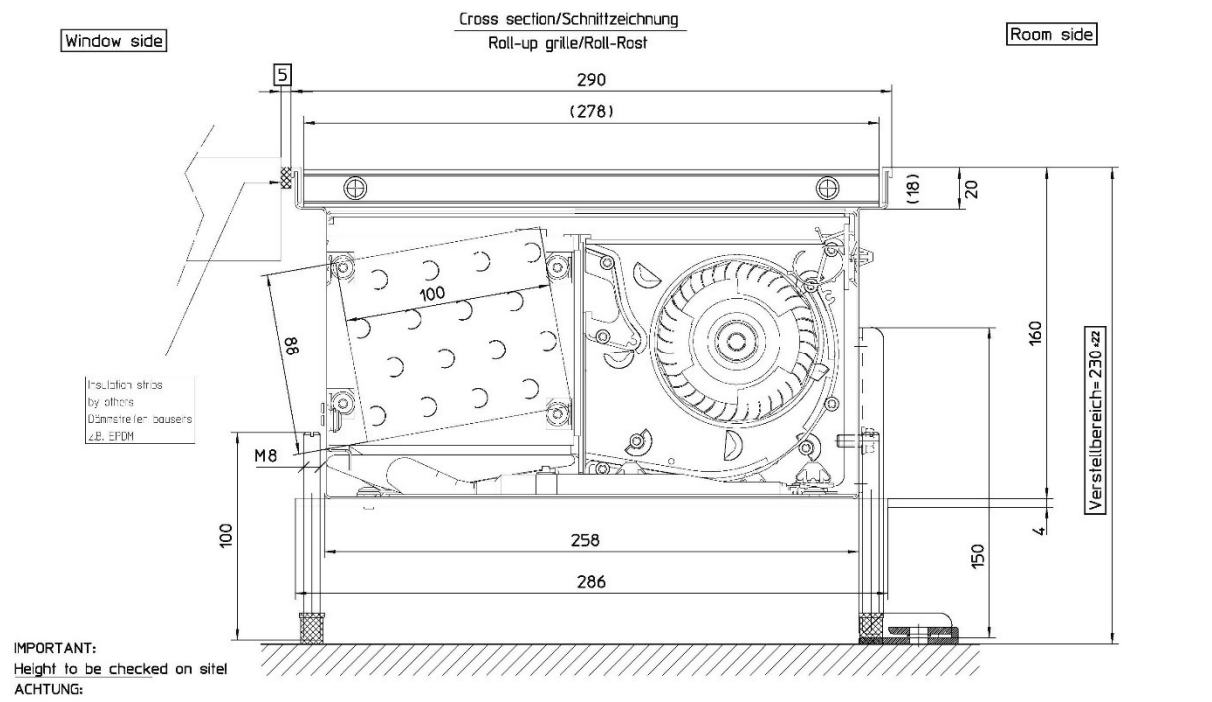
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We attach below a detail of the proposed product, for consideration. The proposed method of installation involves the trimming and bridging of existing floor joists to accommodate the new trench heater box width. The grille itself is rolled into a floor rebated 'tray' so that only the grille is visible inside a fine outline (the tray lip).



The adjacent photograph shows exploration of the existing dining room floor void, revealing modern timber supports below and a void of sufficient depth to hold the proposed trench heater product. Only the grille being visible, flush to the floor.

The floor joists below will be 'trimmed' locally to provide space for the heater, requiring one joist to be cut-out, with the ends re-supported by perpendicular double timbers, spanning between the remaining joists.

Locations are marked on the proposal drawings.

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Repairs to external stonework

Information request:

Whilst we have the covering letter/report from Traditional Stone and their costing, we do not have the photographic record mentioned at page 4 of the report, which presumably contains further information as to the existing condition of the building and areas where various works are proposed. At present, whilst I would not argue with the need for repair work to the elevations of the building (not least to put right earlier poor repairs noted on site, where the masonry appears to have been cut into with power tools), we will need further, more detailed information of the current proposals for a fully informed assessment of their impact on the building and its fabric. If the above-mentioned photographic survey is, as I suspect, cross-referenced to the detailed costing document, this may be sufficient.

Agent response:

With reference to the 'photographic record' we note that there are over 1000 images recorded, so we will send a separate link to this document for 'cloud' transfer at your convenience.

The stone masons have also completed a 'sample' repair to one of the stone gate piers. Joints in the stone sections had opened, leading to potential problems of water ingress including 'freeze-thaw' deterioration and vegetal growth etc. An earlier repair had been attempted, very poorly, scoring the face of the stone to insert rods, thereby bridging the gap to prevent further movement. The 'repair' damaged the appearance of the original stone, with a loss of original fabric.

The more recent repair is to make good the harm of this earlier attempt (therefore a fitting location for such an exercise) and includes infilling joints with a bespoke lime mortar blend. We attach a brief report of the repair, showing the colour blend and finish achieved.

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