

## TECHNICAL NOTE

**Job Name:** Lullings Cottage  
**Job No:** 333101901  
**Note No:** 01  
**Date:** November 2025  
**Prepared By:** Lorraine King, Heritage Planning Director  
**Subject:** Response to Conservation Officer Comments

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### 1. Introduction

- 1.1. This note responds to the objections received from the Conservation Officer in regard to the proposed demolition of Lullings Cottage and its replacement with a single-storey dwelling (DM/25/2066 and 2067). This rebuttal draws upon the submitted Heritage Statement (Stantec, August 2025), the structural survey, and wider planning principles under the NPPF.
- 1.2. The Conservation Officer raises the following points in relation to the proposal:
  - Positive Contribution of site to Lullings / Historic Narrative
  - Condition and Viability / Alternative Options
  - Total Loss of Significance
  - Impact on Conservation Area and long-distance views
  - Outbuilding (Curtilage Listing)
  - Policy Compliance

### 2. Heritage Significance

- 2.1. The Conservation Officer considers that “...*The cottage contributes positively to the setting of Lullings and its special interest...It forms part of the narrative of the farmstead’s evolution from working farm to country residence.*”
- 2.2. The Heritage Statement submitted with the application confirms that while Lullings Cottage is considered curtilage listed, its significance is limited and primarily derived from historic association rather than architectural merit (Sections 4.1.12–4.1.18).
- 2.3. The building is a modest late 19th/early 20th-century structure with no notable detailing or architectural features. Surviving historic fabric is minimal; windows, roof timbers, and internal finishes are largely modern replacements.
- 2.4. Whilst we agree with the Conservation Officer that the farm buildings to the east of the principal building contribute positively to the interest of the Listed Building, we fundamentally disagree with the assertion that Lullings’s Cottage makes a similar contribution. Any contribution to the significance of the of the Grade II listed Lullings is minor and diminishing, with physical and visual separation reinforced by mature vegetation and fencing (Sections 4.1.19–4.1.21). In its current dilapidated state, the cottage is a detracting feature within the setting of Lullings (Section 4.1.24).
- 2.5. We acknowledge this historic association; however, the narrative is primarily expressed through the principal listed building and surviving farm structures.

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- The cottage's role is minor and diminishing due to its altered state.
- This narrative will be documented and preserved through the proposed recording, consistent with Historic England guidance.

### 3. Condition / Viability and Alternative Options

- 3.1. The Conservation Officer states that "...*Retention and extension could provide the required accommodation.*" The structural survey (Appendix F) identifies widespread moisture ingress, failing finishes, and prolonged neglect. While structurally fair, restoration would require:
- Underpinning and full roof replacement.
  - Reconfiguration of internal spaces.
  - Wholesale replacement of windows, doors, and finishes.
- 3.2. Options for retention (Appendix E) were fully explored. Both Option A (Refurbishment) and Option B (Refurbishment + Extension) involve extensive interventions that would erode remaining historic character and fail to meet modern standards for sustainability and accessibility (Sections 5.2.8–5.2.10). As such, whilst retention may be possible, it is simply not a viable option and would in fact result in a heavily altered building, diminishing further the limited significance of the building. It is considered that Lullings Cottage is not of sufficient interest to warrant such a substantial financial investment.

### 4. Total Loss of Significance

- 4.1. The Conservation Officer notes that the proposals would result in the total loss of significance with respect to Lullings Cottage. This is accepted; however, the Heritage Statement (Sections 4.1.12–4.1.18) confirms that Lullings Cottage holds limited heritage significance, which is primarily derived from its historic association with Lullings rather than its architectural merit.
- 4.2. In line with NPPF paragraph 218, a Level 2 Historic Building Recording will be undertaken prior to demolition, ensuring the narrative is preserved.

### 5. Impact on Conservation Area and long-distance views

- 5.1. Concerns have been raised in relation to the visibility of the proposals from Ardingly Conservation Area and the use of glazing having the potential to result in a more visually prominent building as a result of light spill.
- 5.2. The Conservation Officer does not identify any specific views where they consider the site will be visible from within the Conservation Area. As part of the site visit undertaken to inform the heritage assessment, long-distance views from the Conservation Area were considered. The site visit confirmed that the Site is not visible from within the Conservation Area as a result of the surrounding topography, vegetation, intervening built form and landscape features.
- 5.3. The Site forms part of the wider landscape setting of the village; however, it does not make any contribution to the significance of the Conservation Area or aid in the appreciation of its architectural or historic interest.
- 5.4. Long-distance views towards the site were identified from the public footpaths to the west of the South of England Showground. These views were considered in the Heritage Statement (Section 4.1.11; Appendix G) and in the Design and Access Statement. Of the views considered, View 1 is located at closest proximity to the Conservation Area boundary and the assessment demonstrates that the site is not prominent within this view.

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- 5.5. The proposed dwelling's low profile and muted materials ensure that it will not be visually prominent within long-distance views. In addition, when considered in the context of the existing building, the proposal represents a markedly more restrained and subtle intervention, which will in fact be less visible. Further justification for the approach is set out in the Design and Access Statement submitted with the application. This sets out how the design strategy prioritises integration with the landscape and minimises visual intrusion.
- 5.6. In terms of the potential for light spill, it is considered that this could be managed through the use of appropriate materials, and the glazing can be designed in such a way as to limit/reduce the potential for visual intrusion.
- 5.7. The site does not contribute to the significance of the Conservation Area, nor is it appreciable within views outwards. As such the proposals would not result in any harm to the Conservation Area's significance.

### 6. Outbuilding (Curtilage Listing)

- 6.1. The Conservation Officer suggested that the timber outbuilding to the northwest of Lullings Cottage may also be curtilage listed. The Heritage Statement (Sections 2.2.8–2.2.9) provides clear evidence that this is not the case:
- A visual inspection confirmed the structure is of modern construction, with no surviving historic fabric.
  - While cartographic evidence shows a structure in this location historically (1910 OS map), the current building is a later replacement built on the footprint of an earlier building.
  - It holds no architectural or historic interest that would warrant curtilage listing under Historic England Advice Note 10. Therefore, the outbuilding does not benefit from statutory protection, and its removal or alteration does not constitute harm to heritage significance.

### 7. Policy Compliance

- 7.1. For the reasons set out in the submitted Heritage Statement and reiterated above, it is considered that the proposal complies with NPPF Section 16 and local planning policy by:
- Providing proportionate assessment of significance.
  - Demonstrating that harm is less than substantial and outweighed by public benefits (NPPF para. 208), including:
    - Delivery of a sustainable, high-performing dwelling.
    - Improved accessibility through lifetime home design.
    - Enhancement of the setting of the principal Listed Building.

### 8. Conclusion

- 8.1. The evidence submitted in support of the application demonstrates:
- Lullings Cottage holds **limited intrinsic heritage value**.
  - Retention is **not viable** and would erode what little significance remains.
  - The outbuilding is **modern and not curtilage listed**.

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- 8.2. The proposed scheme represents a balanced, policy-compliant approach, delivering public benefits while respecting the significance of the principal listed building and the wider historic environment.