



# ST MARGARET'S CHURCH, ROTTINGDEAN

DESIGN & ACCESS STATEMENT  
FOR THE EXTENSION &  
INTERNAL RE-ORDERING OF  
ST. MARGARET'S CHURCH

FULL PLANNING APPLICATION

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## I.0 Introduction

This document has been prepared to support the Full Planning application for St Margaret's Church, Rottingdean. The proposals cover two key areas of development: the internal re-ordering of the Grade II\* Listed Church and a substantial extension to the north of the existing church building. Under the Ecclesiastical Exemption Order 2010, Listed Building Consent is not required.

The text in this document should be read in conjunction with the accompanying drawing package and Combined Statement of Significance and Need.

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ordering



## St Margaret's Church

### Extension and re-ordering

## 2.0 Site Location

### Site Location

The site is located in Rottingdean, a small village, within the boundaries of the City of Brighton, on the south coast of England and within the administrative control of Brighton and Hove City Council. It is situated 1.9 miles east of Brighton City Centre, 18.5 miles to the west of Eastbourne and 7.8 miles south west of Lewes. The site is within the Rottingdean Conservation Area.

The nearest bus stop to the site is a 3 minute walk away, which provides services to Brighton, Saltdean, Steyning and other surrounding villages. Brighton Train Station is a 25 minute drive away and offers onwards travel to London, Southampton and Hastings.

Gatwick Airport is easily accessible by train from Brighton, within 40 minutes, and offers short-haul flights within the UK and Europe, and long-haul flights across the globe.

### Site Description

The site is approximately 0.9 hectares. It is classified as D1 and is occupied by the Grade II\* listed St Margaret's Church and its associated churchyard. The site is also within the Rottingdean Conservation Area. There is a gradual fall across the site from east to west.

There are two access points to the site, with the primary access point from B2123 to the west. A further, secondary access point to the site is located off Dean Court Road, in the north east corner of the site.

The site is bounded by historic flint walls on all sides that are integral to the setting and character of the site. The north and south boundaries are demarcated by the extent of adjacent residential properties and the east boundary by St. Margaret's Church of England Primary School and its associated playing fields. To the west the site is defined by the B2123 and its accompanying footpath.

Due to the urban setting of the site, there only significant view into the site is from the west, along the B2123. The church is located in the middle of the site and is constructed primarily from flint stone and red tiles.



Figure 2.0 - The site as viewed from The Green, showing the primary access point.



Figure 2.1 - The lychgate.





Figure 2.2 - The west elevation of St Margaret's Church.

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Figure 2.3 - The south elevation of St Margaret's Church.



Figure 2.4 - The east elevation of St Margaret's Church.



Figure 2.5 - The north elevation of St Margaret's Church.



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Figure 2.7 - The site, as viewed from the north, showing it's relationship with Dean Court Road.



Figure 2.8 - The interior of St Margaret's church.





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### 3.0 Surrounding Context

#### Local Context

- Within the Rottingdean Conservation Area
- Selection of houses from the C14th to the C20th
- The majority of houses are a mix of detached, semi-detached and terraces properties ranging from between 1 and 2 storeys in height
- Parking to properties is mostly on-street parking, with few properties having a designated parking space within their boundaries
- Dwellings are arranged to front the road
- Dwellings are either set back from the road or are directly adjacent to it, and many have a boundary wall to the front
- Dwellings have predominantly pitched roofs with red/ brown or slate tiles
- Dwellings are predominantly flint, stone, rendered or have wall hung tiles (or a combination of these)



*Figure 3.0 - Grade II Listed, 2 storey dwelling on the B2123, looking east*



*Figure 3.1 - Grade II Listed, 2.5 storey dwelling fronting The Green, looking south west*



*Figure 3.2 - Grade II Listed, 2 storey dwellings to the south of the site, looking south east*



*Figure 3.3 - Historic terraced houses along Olde Place Mews, looking west*



*Figure 3.4 - Terraced properties at the Dene, a retirement village, looking east*



*Figure 3.5 - Historic terraced cottages on Dean Court Road, looking north*



## St Margaret's Church

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## 4.0 Pre-Application Response

### Pre-Application

Throughout the design process we have maintained a good level of communication with the local planning department and relevant Statutory Bodies. A number of options were submitted for Pre-Application advice and general comments were provided for all of them. The options submitted for this advice are included in Appendix A.

Ayscha Woods was the case officer from Brighton and Hove City Council who dealt with our Pre-Application enquiry PRE2020/00034 and we have included the Pre-Application response (Appendix B). We have also included the comments from Tim Jefferies (Conservation Officer) in Appendix C. In addition to the responses received from Brighton and Hove City Council, we have also included the responses from the Statutory Consultees in [Appendixes D-F](#).

We have taken the opportunity below to highlight the key points and comments raised by Ms Woods, Mr Jefferies and the Statutory Bodies.

### Brighton and Hove City Council (Appendix B)

Ms Ayscha Woods

Ms Woods acknowledged that 'there would be clear public benefits in works that would enable the Church to improve and increase its offer to the local community'. Furthermore the response also stated that 'there is no objection in principle to extending the church in order to help achieve these benefits and it agreed that the north side of the Church nave would be the least harmful location'.

- The principle of an extension is likely to be supported however careful consideration would need to be given to the positioning, scale and appearance
- A simple modern approach would be the preferred design approach
- The extension should be lightweight in appearance, maximising the amount of glazing
- The smaller options would be the most appropriate approach
- The eaves height should be similar to that of the 1970s vestry extension
- The scale of the preferred extension option raised concerns (as viewed from Dean Court Road) both in terms of harm to the oldest surviving elements of the Church and the internalisation of the Burne-Jones/Morris windows
- If the preferred option is pursued, the extension should be set back from the line of the 1970s extension, preferably to match the width of the south aisle.
- The smaller options should be pursued to achieve an appropriate balance between harm to the building and the provision of facilities
- Any application should be accompanied by a desk-based archaeological assessment.

### Brighton and Hove City Council (Appendix C)



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Mr Tim Jefferies

Much of the text duplicated that of the Pre-Application Response (Appendix B).

#### Historic England (Appendix D)

Ms Alma Howell

- Accepts the need for new church facilities. Also recognised and appreciated the comprehensive options appraisal that had been undertaken.
  - Generally supportive of the proposed re-ordering, noting that the pews are not of any particular significance.
  - Agree that the best place for any extension would be on the north side
  - Highlighted that the north wall of the Nave is the oldest surviving wall of the church and contains significant stained glass windows
  - Main concern with the larger extension is the potential loss of natural light through the stained glass windows. Before supporting a large extension they would need to be satisfied that the proposal would not be overly harmful to the windows
  - No objections, in principle, to the re-opening of the north door
  - Recommended consultation with both the DAC's Archeological Advisor and the County Archaeologist
- 
- As there is no viewpoint, internally or externally, from which both aisles would be viewed it is deemed unnecessary to place arbitrary restraints on the proposal.

To address the concerns, raised by Brighton and Hove City Council and the Statutory Bodies, we have made a number of design changes that include:

We have demonstrated the impact of these changes on the following pages.





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## 5.0 Design Approach

### Access

There are two access points to the site, with the primary access point from B2123 to the west. A further, secondary access point to the site is located off Dean Court Road, in the north east corner of the site. The proposed development does not intend to alter this arrangement, as the primary access point to the site is still off the B2123.

Rottingdean is considered an 'Outer Area' in the council's Parking Standards Supplementary Planning Document. This document requires 1 no. parking space per 20m<sup>2</sup> of internal area, which would require 25 spaces after the construction of the proposed extension.

As this level of parking provision would prove undesirable on the historic site, we believe that for the following reasons the need for additional parking spaces is negated:

- Close proximity to an extensive public transport network
- The abundance of on-street parking available in the area
- The congregation and users of the church live locally, most within walking distance.
- The access point to the site, from Dean Court Road, already has a dropped kerb however a large number of graves would need to be disinterred and relocated to provide car parking spaces.
- The potential vehicular access point off the B2123 would require a new dropped kerb and break in the historic boundary wall which is considered unacceptable in terms of the loss of historic fabric. Additionally this would have a detrimental effect on the Conservation Area and would very much be out of keeping of the surrounding properties and buildings.

If the 25 spaces necessary, to meet the requirements for the SPD, were provided the boundary wall would need part removal to allow access to the site and a large area of the graveyard would need to be re-landscaped. The current church has no associated parking and has not experienced problems with parking in the past, due to the high number of users living in the immediate area.

There is an acute shortage of community facilities in the centre of Rottingdean and this development would help to fill the gap.

### Use

The site is currently classified as DI (Non-residential institution) and the proposed project will not result in a change of use from this classification.

### Amount

The proposed extension will add an additional 65 m<sup>2</sup> at both ground floor and first floor, to total additional floor area of 130 m<sup>2</sup>. This increases the total internal area from 355 m<sup>2</sup> to 485 m<sup>2</sup>.



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The proposals have been developed to minimise the impact on both the internal and external historic fabric of St. Margaret's Church. To achieve this minimal impact, the provision of much needed kitchen, WC and meeting room facilities has been accommodated within an extension to maintain the internal volume and space within the historic church building.

The detached nature of the current Church Hall facilities, at St. Margaret's Cottage, make providing the necessary amenity facilities impractical. Substantial works would be required to provide accessible access between the two buildings that would need to be over 40m long to accommodate the significant level change across the site. As many users of the site are elderly or are vulnerable, it is inappropriate to expect them to use remote facilities throughout the year.

#### **Site Layout**

The proposed site layout will not be hugely affected by the proposed extension and re-ordering of St. Margaret's Church.

The main entrance/access point to the church will remain unchanged, as too will the primary pedestrian access point off the B2123.

A large amount of earth will be removed to the north of the church to allow the internal ground level of the extension to match that of the existing internal floor level to ensure accessible access through the building. Additionally, it also allows a second storey of accommodation to be provided to best maximise the use of the site, whilst ensuring that the development does not have an overwhelming presence on the street or Conservation Area setting. By excavating down it is possible to achieve a proposed ridge level equal to that of the existing vestry extension.

The internal planning of the building will allow the provision of a large, flexible space within the church and the necessary amenity facilities (within the extension) to support services and non-secular events. Consultations with the relevant Statutory Bodies at Pre-App stage were generally positive to this approach and more details have been included in *4.0 Pre-App Response*.

Please refer to the accompanying drawings for more details.

#### **Internal Layout**

On entering the church, the existing lobby will be enlarged through the removal of an existing screen to the south (which currently encloses a storage area). Within this space, it is proposed that there will be high-quality, bespoke storage cupboards, a designated buggy storage area and wall-mounted, digital information displays. From this improved entrance area access to the nave and amenity facilities is provided.

The proposed internal layout of the nave and south aisle will be altered to allow the creation of a large, open-plan, flexible space for use by the church and non-secular user groups for a wide range of activities. Removal of the



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existing pews and pew platforms will facilitate this. Heating to the nave and south aisle will be predominantly via a proposed underfloor heating system that is supplemented by wall mounted radiators located on the perimeter walls. Storage for stacking chairs is provided at the west end of the south aisle.

A new timber platform is proposed at the east end of the nave to which a proposed step lift to the east end of the south aisle provides access for less-abled users. The altar, chancel and high altar are unchanged as a result of the proposals.

The current WC facilities, vestry and staircase, to the 1970's extension, are to be removed to allow the provision of a fully accessible lift and staircase to first floor level, 1 no. accessible WC and shower room, 3 no. standard WC facilities and access to the proposed extension. At ground level a store, kitchen and vestry are provided within the new extension.

At first floor level high-quality, bespoke storage will be provided to the gallery alongside upgraded AV provision. Within the extents of the 1970's extension a small meeting room will be provided in addition to the fully accessible lift and staircase to ground floor level. A large, open-plan meeting room, with dedicated tea point is proposed at first floor level within the extents of the proposed extension.

We have included floor plans, that demonstrate the internal layouts of the proposal on the following pages. These have also been included as separate documents as part of this application.

### **Scale and Appearance**

The pitch of the roof will match that of the existing 1970's vestry extension to the west and will continue the ridge line at the same level. It will be finished in tiles to match the existing vestry roof to minimise the impact of the extension as viewed from the north on Dean Court Road. The view of the extension from the west (as viewed from The Green) will be minimal due to the fall across the site and it will not be visible from the south. The extension will be prominent when the church is viewed from the east and great care has been taken in the design so far to ensure that the extension is subservient to the church and sympathetic to its context.

The proposed new building is intended to be constructed from insulation cavity walls and an insulated roof. The extension will be clad in flint stone, with quoin details and a red tile roof to match the existing roof.

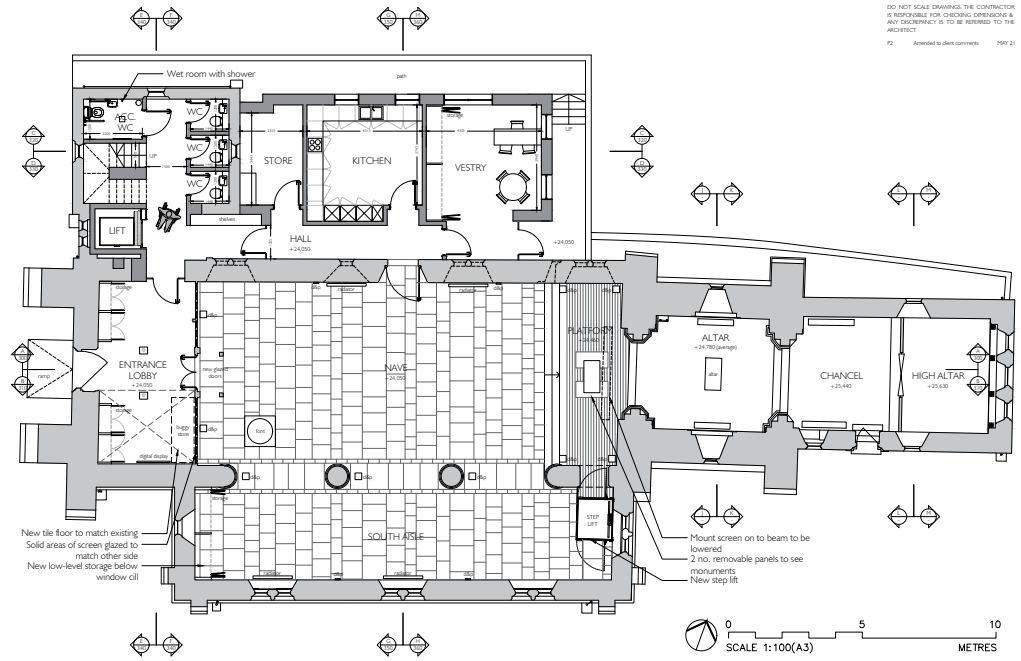




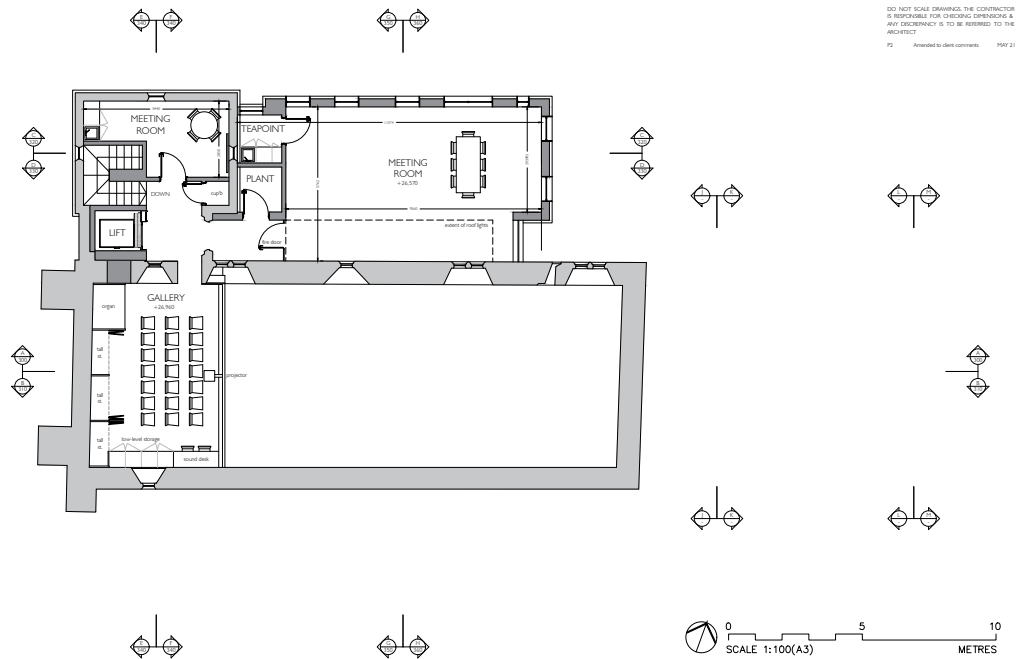
## St Margaret's Church

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## St. Margaret's Church - Proposed Ground Floor Plan



## St. Margaret's Church - Proposed First Floor Plan





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## 5.0 Sustainability

The proposal has been designed to deliver a scheme that would be energy efficient and promote resource conservation. Both the internal re-ordering and extension would be designed to include sustainable features from the following list to reduce energy demands and improve overall energy efficiency.

- Highly insulated walls, floors and roofs
- Energy efficient boilers
- Installation of energy efficient appliances and light fittings
- Installation of low flush toilet and sanitary fittings
- Insulated pipework
- Argon filled, sealed double glazed window units to control solar gain
- A good air tightness value to minimise the potential for loss of heat energy through air leakage
- Provision of Operational and Maintenance manuals to inform residents of the energy saving design features installed within the proposed building

## 6.0 Landscape and Ecology

A large amount of excavation is required to ensure the proposed floor level of the extension matches that of the existing nave floor. There is evidence that the proposed development site has been used as recently as the C20th for burials and also has the potential to contain medieval and pre-medieval deposits. Please refer to the accompanying Statement of Significance and Need and Archaeological Assessment for more information.

There are no major trees, both on or adjacent to, the development site that will be detrimentally affected by the proposal.

A Bat Survey was undertaken as part of previous repair works to the tower at St Margaret's. No detailed survey has been undertaken in relation to the area concerned by the proposed extension. There is no evidence to suggest that roosting bats or nesting birds are using the roof of the 1970's vestry extensions. As this is the only area that will be disturbed during the construction works, no accompanying ecological survey has been submitted as part of this application.



## St Margaret's Church

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## 7.0 Conclusion

This Full Planning statement details how the proposal seeks to deliver both a sustainable and well considered extension to St Margaret's Church. The proposals are designed to use the site effectively, whilst also ensuring that their impact on the views within the Rottingdean Conservation Area is minimal. Additionally, the development has been designed so as to not compromise the amenity of adjacent residential dwellings but also allows the provision of much needed, high-quality amenity facilities for community use.

We believe the content of this statement provides a good understanding of the extent to which we have developed the design to respect the surrounding context. For the reasons set out below, we feel this proposal should be deemed acceptable:

- The proposal provides much needed, high-quality community facilities in the heart of Rottingdean
- The proposal aims to enhance the standard of architecture in the local area whilst sympathetically extending the Grade II\* Listed St. Margaret's Church.
- Care has been taken to minimise the harmful impact on the historic built fabric of the Church.
- Care has been taken to produce a design with a traditional form that comfortably sits alongside and compliments the historic fabric.
- The extension has been designed to incorporate a wide range of sustainable features to reduce the carbon emissions of the building as a whole.
- The site layout has been carefully considered to reduce the impact on the views from within the Conservation Area and provides buildings that benefits from a good level of natural daylighting and views.
- The proposal creates an appropriate and attractive development which will improve the surrounding setting.

Please let us know if you require any further information to assist with processing this Full Planning enquiry.

**Johanna Mayr BA (Hons), MArchD**  
**June 2021**













# St Margaret's Church

## Extension and re-ordering

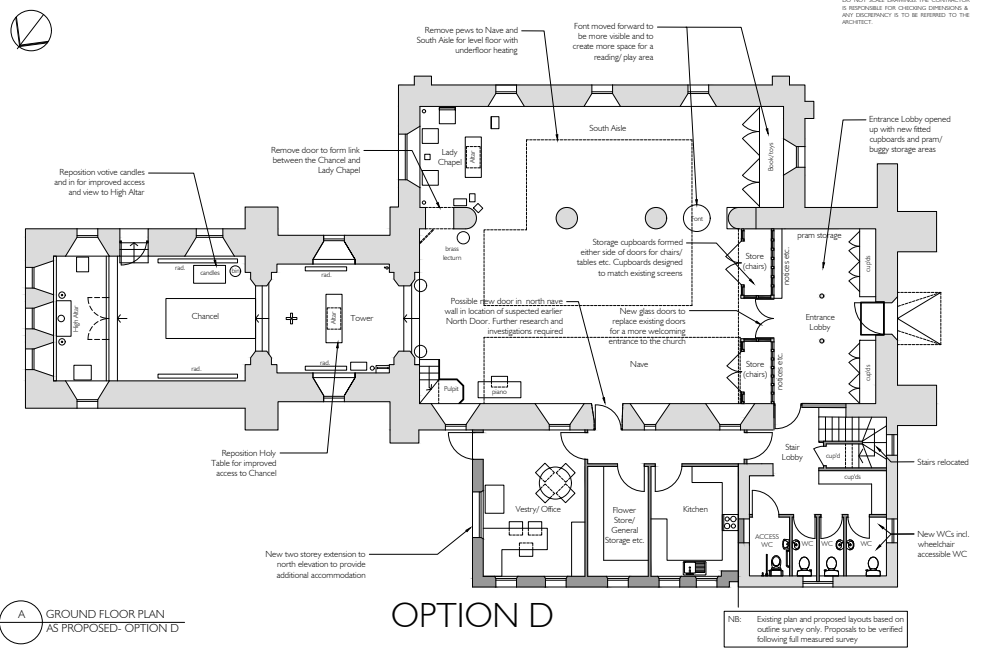


Figure 8.7 - Option D - Ground Floor Plan

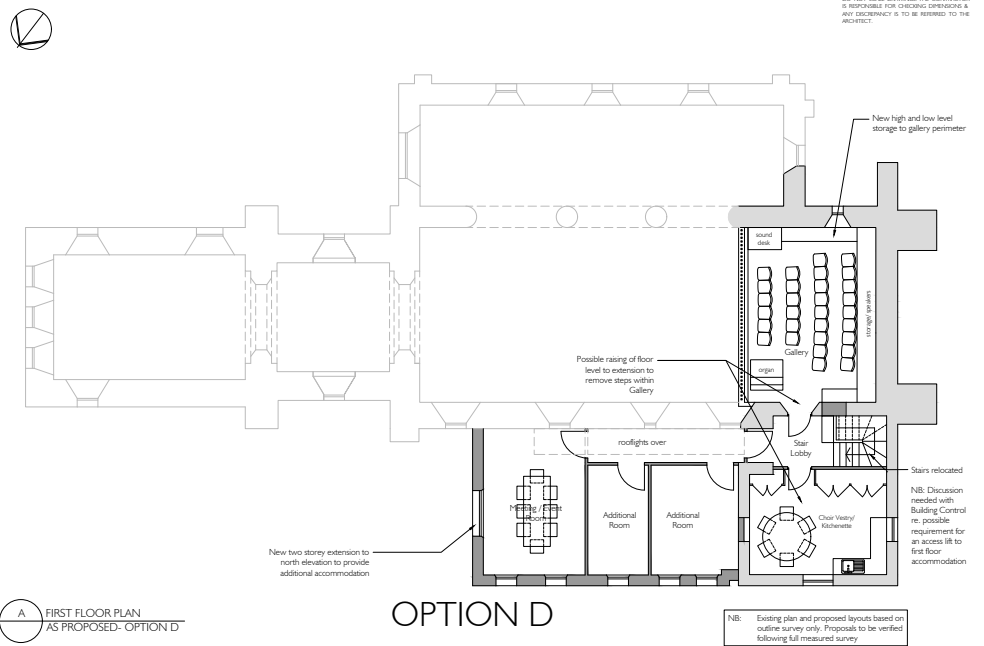


Figure 8.8 - Option D - First Floor Plan





# St Margaret's Church

## Extension and re-ordering

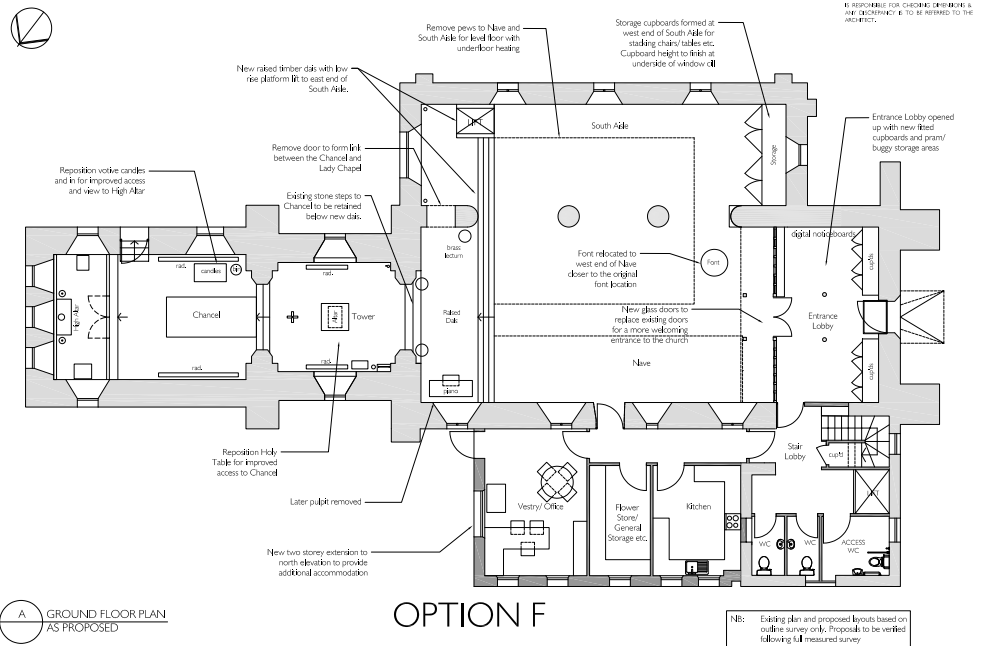


Figure 8.11 - Option F - Ground Floor Plan

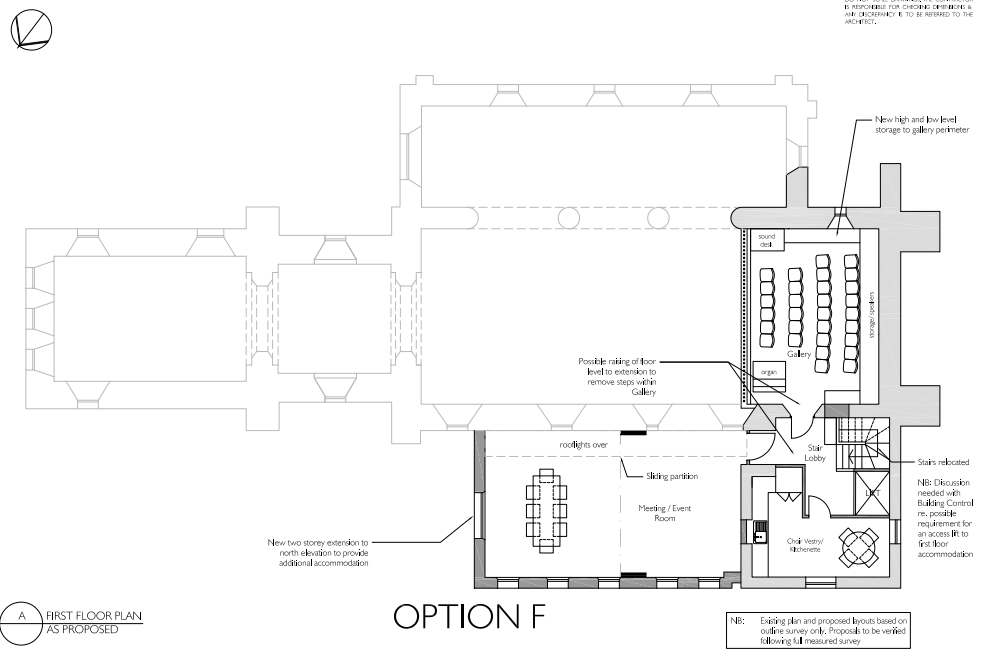


Figure 8.12 - Option F - First Floor Plan



## 8.1 Appendix B

**Brighton and Hove City Council**

Ms Ayscha Woods



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Joanna Glasin  
Thomas Ford And Partners  
177 Kirkdale  
London  
SE264QH

Date: 3 April 2020  
Officer Name: Ayscha Woods  
Officer Phone: 01273 292322

**Pre-application Advice – Reference PRE2020/00034**

**Site/Property: St Margarets Church The Green Rottingdean Brighton BN2 7HA**

Thank you for your pre-application advice request.

This letter is the response to your request dated 10/02/20 and further to the site visit meeting with the heritage officer on 20/02/20 for pre-application advice on the proposal for a side extension at the above site.

It is noted that the applicant has only provided floor plans as part of this proposal. No elevations have been submitted. The advice is therefore limited to the information provided. In addition, the applicant has submitted a number of different proposed options (A-F). The Local Planning Authority (LPA) would not usually provide advice on more than one proposal. Whilst the LPA will not be providing comment on each option individually, it has however reviewed all of the options and the overall advice is set out below.

**Response Summary**

- o The principle of an extension is likely to be supported however careful consideration would need to be given to the positioning, scale and appearance.
- o A simple modern design would be the preferred design approach to make it clear that the extension is a clearly later addition to the building.
- o The extension should be of a lightweight appearance, with subtle contrasting materials, and maximising the amount of glazing.
- o A small footprint like those set out in options C and E would be the most appropriate approach for an extension to this building.
- o The eaves height of the extension is similar to that of the 1970s extension and is well below the main eaves.
- o The above points would help to achieve an acceptable balance between harm and benefits and would help to result in a scheme which could be supported by the Local Planning Authority.

**Key Considerations**

It is considered that the following are the key material planning considerations that have a bearing on the proposal:

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Printed on recycled, chlorine-free paper

PREAPPFA

**Principle of Development:**

The need for the proposed extension is set out in the submitted Statement of Significance and Need. It is acknowledged that there would be clear public benefits in works that would enable the Church to improve and increase its offer to the local community and thereby sustain the use of the listed Church as a place of worship in the longer term.

Paragraph 192 of the NPPF makes clear that in determining applications the local planning authority should take account of the desirability of putting heritage assets to viable uses consistent with their conservation and the positive contribution that conservation of heritage assets can make to sustainable communities.

The submission has set out a preferred option for meeting the needs of the Parish County Council (PCC) as the applicant (Option F) and has included five other options that were considered (Options A to E). At the site meeting the potential to extend the community facilities in the 'church hall' at St Margaret's Cottage, as an alternative, was discussed. Any application should set out why this option is not considered to be practical.

Subject to the above, there is no objection in principle to extending the church in order to help achieve these benefits and it is agreed that the north side of the church nave would be the least harmful location for an extension, adjoining the 1970s extension.

**Design and Appearance:**

It is noted that the north wall of the nave is one of the oldest surviving elements of the church and may indeed be the oldest. In addition it contains two of the stained glass windows by Burne-Jones/Morris. Both of these elements are noted in the Statement of Significance and Need as being among the aspects of the church that are of the highest significance. As noted above, too, the north side of the church is prominent when seen from Dean Court Road.

In view of this, whilst no elevations have been submitted as part of this pre-application request, the scale of the extension proposed under Option F raises concerns and it is considered that such an extension would cause clear harm to the listed building and also to the conservation area. It would externally cover most of the original north nave elevation, meaning that it would no longer be in external or public view, from the churchyard and from Dean Court Road, It would also internalise the two Burne-Jones/Morris windows. Whilst the submission suggests that the larger of the two windows could be relocated eastwards to remain external - swapped with the adjacent one - this would mean that the two Burne-Jones/Morris windows would no longer be seen adjacent to one another and is unlikely to be supported.

Whilst the benefits of the scheme have been acknowledged above, it is considered that the harm has not been sufficiently minimised or mitigated and that the proposals have not achieved an appropriate compromise between the significance of the church and the needs of the applicant (the PCC). The smaller footprint of the extension set out in Options C and E would better achieve a balance between harm and benefits.

There would be no objection to the formation of the new doorway in the north wall and it is considered that this has been justified. If a longer extension than that shown in Options C and E were to be able to achieve the appropriate balance it would need to be set back from the line of the 1970s extension, in order to avoid the two merging in scale, and it is considered that it would be most appropriate for it to be set back so that it would match the width of the south aisle.

The design, elevational treatment and materials of the proposed extension do not form part of the submission, but the principle of whether the extension should be of contemporary design or should match the existing was discussed on site. In view of its intended scale, the presence of the previous 1970s extension and the number of windows required for the internal uses, it is considered that a contemporary design approach would be more appropriate in this case. A simple but lightweight approach to the design and a subtle contrast of material, maximizing the amount of glazing whilst achieving a vertical proportion akin to the Norman and Early English windows, would likely be most appropriate.

It would be important that the eaves height of the extension is similar to that of the 1970s extension and is well below the main eaves. The proposed glazed section of roof over the corridor, as raised at the site meeting, would help to bring some natural light to the internalised windows and would enable users to see the nave wall above. Careful consideration should be given to the ventilation of the kitchen and toilets, and other servicing, to avoid a proliferation of mechanical vents etc.

**Impact on Amenity:**

It is unlikely that the proposed works would result in a harmful impact on the neighbouring occupiers. This would be considered as part of a site visit if a formal planning application were to be submitted.

**Other:**

The site lies within an Archaeological Notification Area and, as the submitted Statement of Significance and Need notes, there is potential that mediaeval and pre-mediaeval deposits exist within the churchyard. Any application should therefore be accompanied by a desk-based archaeological assessment. The Brighton & Hove Archaeological Society and the County Archaeologist would be consulted as part of any formal planning application.

**Consultation Requirements**

You are encouraged to engage with neighbours and/or stakeholders before submitting your planning application in line with the Council's Statement of Community Involvement.

Further information required with any future planning application

- o Justification as to why the community facilities in the 'church hall' at St Margaret's Cottage could not be extended as an alternative option.
- o A desk-based archaeological assessment.

**Appendix 1 - Planning Policies and Guidance**

The Development Plan is available to view on the Council's website which can be found at <https://www.brighton-hove.gov.uk> . To assist, here is a list of policies which are most relevant to your proposal.



City Plan Part One (2016):

- o SS1 Presumption in Favour of Sustainable Development
- o CP12 Urban design
- o CP15 Heritage

Saved Local Plan retained policies (2005)

- o HE1 Listed Building Consent
- o HE3 Development affecting the setting of a listed building
- o HE4 Reinstatement of original features on Listed Buildings
- o HE6 Development within or affecting the setting of conservation areas
- o HE12 Scheduled ancient monuments and other important archaeological sites
- o QD14 Extensions and alterations
- o QD27 Protection of amenity

Supplementary Planning Documents

- o SPD12 Design Guide for Extensions and Alterations
- o SPD09 on Architectural Features

Yours faithfully

Ayscha Woods

**Disclaimer**

I hope you find this information helpful. Please note that the opinions expressed are informal and are given without prejudice to any future decision that the Council may make in its capacity as the Local Planning Authority. This reflects the nature of the planning application process and which will involve consultation with other bodies and local consultation. The advice given may subsequently be affected by external factors (e.g. new government guidance, local appeal decisions) which could result in a different view being subsequently put forward.

## 8.2 Appendix C

**Brighton and Hove City Council**  
Mr Tim Jefferies



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## Pre-application advice



**Application No:** PRE2020/00034

**Address:** St Margaret's Church, The Green, Rottingdean, Brighton

**Description:** A small extension to the north side of the church to provide a new kitchen, vestry/office, flower store, and a large meeting room for Sunday School.

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### Statement of Significance

This property is a grade II\* listed building within the Rottingdean conservation area. The history and significance of the church has been well covered in the submitted Statement of Significance and Need.

It has an extensive setting, formed by the churchyard with its flint walls and mature trees. The church is a local landmark, as noted in the Rottingdean Conservation Area Character Statement, and has a strong relationship with the public open space of The Green, from where the west end of the nave and the tower above form a focal point. From here the church is seen in context with the grade II listed The Grange and the grade II listed The Elms. There are also key views of the south side of the church from within the churchyard. The north side of the church is prominent in views from Dean Court Road, particularly the nave roof and tower, and is seen in the context of the grade II listed Tudor Close, a 1930s residential development in well detailed 'Tudorbethan' style.

The church sits within 'The Green' character area of the Rottingdean conservation area. This character area forms the heart of the village. It comprises large high status residences, walled gardens and the church located around a historic village green and pond. The green originally extended northwards to incorporate the area of Kipling Gardens and The Elms. This area is of importance historically for its association with Rottingdean's famous artistic and literary inhabitants, and architecturally due to the quality of the high status buildings they dwelt in. Tall flint walls to Kipling Gardens and the private gardens of surrounding residences create a clear sense of enclosure and seclusion. The residences themselves are generally visible above or beside these walls, and their architectural quality, scale and design reflect their high status. Overall, the combination of open space, buildings of special architectural quality and the sense of privacy promote a genteel character to the area.

The site lies within an Archaeological Notification Area.

### Site Visit and Meeting

A site visit and meeting took place on 20 February 2020.

## Heritage Advice

The need for the proposed extension is set out in the submitted Statement of Significance and Need. It is acknowledged that there would be clear public benefits in works that would enable the Church to improve and increase its offer to the local community and thereby sustain the use of the listed Church as a place of worship in the longer term.

Paragraph 192 of the NPPF makes clear that in determining applications the local planning authority should take account of the desirability of putting heritage assets to viable uses consistent with their conservation and the positive contribution that conservation of heritage assets can make to sustainable communities.

The submission has set out a preferred option for meeting the needs of the PCC as applicant (Option F) and has included five other options that were considered (Options A to E). At the site meeting the potential to extend the community facilities in the 'church hall' at St Margaret's Cottage, as an alternative, was discussed. Any application should set out why this option is not considered to be practical.

Subject to the above, there is no objection in principle to extending the church in order to help achieve these benefits and it is agreed that the north side of the church nave would be the least harmful location for an extension, adjoining the 1970s extension. It is understood that the existing graves in this area dated from the first half of the 20<sup>th</sup> century; there are no listed tombs in this area.

Nevertheless it must be noted that the north wall of the nave is one of the oldest surviving elements of the church and may indeed be the oldest. In addition it contains two of the stained glass windows by Burne-Jones/Morris. Both of these elements are noted in the Statement of Significance and Need as being among the aspects of the church that are of the highest significance. As noted above, too, the north side of the church is prominent when seen from Dean Court Road.

In view of this the scale of the extension proposed under Option F raises concerns and it is considered that such an extension would cause clear harm to the listed building and also to the conservation area. It would externally cover most of the original north nave elevation, meaning that it would no longer be in external or public view, from the churchyard and from Dean Court Road. It would also internalise the two Burne-Jones/Morris windows. Whilst the submission suggests that the larger of the two windows could be relocated eastwards to remain external – swapped with the adjacent one – this would mean that the two Burne-Jones/Morris windows would no longer be seen adjacent to one another.

Whilst the benefits of the scheme have been acknowledged above, it is considered that the harm has not been sufficiently minimised or mitigated and that the proposals have not achieved an appropriate compromise between the significance of the church and the needs of the applicant (the PCC). The smaller footprint of the extension set out in Options C and E would better achieve a balance between harm and benefits. There would be no objection to the formation of the new doorway in the north wall and it is considered that this has been justified. If a longer extension than that shown in Options C and E were to be able to achieve the appropriate balance it would need to be set back from the line of the 1970s extension, in order to avoid the two merging in scale, and it is considered that it would be most appropriate for it to be set back so that it would match the width of the south aisle.

The design, elevational treatment and materials of the proposed extension do not form part of the submission, but the principle of whether the extension should be of contemporary design or should match the existing was discussed on site

In view of its intended scale, the presence of the previous 1970s extension and the number of windows required for the internal uses, it is considered that a contemporary design approach would be more appropriate in this case. A simple but lightweight approach to the design and a subtle contrast of material, maximizing the amount of glazing whilst achieving a vertical proportion akin to the Norman and Early English windows, would likely work best.

It would be important that the eaves height of the extension is similar to that of the 1970s extension and is well below the main eaves. The proposed glazed section of roof over the corridor, as raised at the site meeting, would help to bring some natural light to the internalised windows and would enable users to see the nave wall above. Careful consideration should be given to the ventilation of the kitchen and toilets, and other servicing, to avoid a proliferation of mechanical vents etc.

The site lies within an Archaeological Notification Area and, as the submitted Statement of Significance and Need notes, there is potential that mediaeval and pre-mediaeval deposits exist within the churchyard. Any application should therefore be accompanied by a desk-based archaeological assessment.

### **Relevant Policies and Guidance**

The NPPF.

The NPPG.

Historic England Good Practice Advice Notes 2 and 3.

City Plan Part One policy CP15.

Local Plan policies HE1, HE3, HE4, HE6 and HE12.

SPD09 on Architectural Features.

Rottingdean Conservation Area Character Statement

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Date: 24 February 2020

Tim Jefferies  
Principal Planning Officer (Conservation)  
Policy, Projects and Heritage Team  
City Development and Regeneration



## 8.3 Appendix D

**Historic England**  
Ms Alma Howell



St Margaret's  
Church

Extension and re-  
ordering

## LONDON AND SOUTH EAST OFFICE

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12<sup>th</sup> August 2020

Dear Mr Bailey

### **Request for Pre-application Advice**

### **ST MARGARET'S CHURCH, THE GREEN, ROTTINGDEAN, BRIGHTON, BN2 7HA**

Thank you and Father Anthony for taking the time to show me around St Margaret's Church and explaining your proposals to me at our site visit.

### **Advice**

St Margaret's is a delightful flint church of ancient origins, located in a large churchyard, on rising ground overlooking Rottingdean village green. The church was extensively restored in the Victorian period by the nationally renowned architect G.G. Scott when the south aisle was constructed. Of particular significance and what draws many visitors to the church are the beautiful and important stained glass windows by Morris and Co and the celebrated artist Edward Burne-Jones. The church is listed at grade II\*.

The proposals are to re-order and extend the church to provide it with a sustainable future by increasing the range of liturgy, delivering new mission activities and making better use of the building as a facility for the community.

Historic England accepts the need for new facilities in churches. We acknowledge that congregations wish to adapt their places of worship to respond to changing patterns of worship and to increase their mission. We also recognise and appreciate the comprehensive options appraisal that has been provided to determine the best way to provide the new facilities that will also meet the parish's needs into the future.

### **Re-ordering**

We are generally supportive of the proposed re-ordering proposals which seek principally to: remove the pews which were added in the late Victorian and are not of any particular significance; provide a new level floor with under floor heating; and

extend the floor at the base of the tower to form an eastern dias to the Nave and South Aisle.

In considering new flooring, underfloor heating and furniture for the church, we advise that you look at our guidance 'New Work in Historic Places of Worship' which provides advice on appropriate ways to install these. They should be of a high quality and their arrangement and design very carefully considered so that the scheme has unity and cohesion. The flooring should be designed to reflect the divisions of the architecture and different uses of the interior, and be appropriately detailed. In order to minimise impacts on the understanding of the progression of spaces through the church we also recommend that the extension to the floor to form an eastern dias is also carefully detailed.

#### Options to provide new facilities and new Extension

A number of options have been presented which explore different ways of adapting and extending the church to meet the needs of the parish. Two options include re-arrangement of the uses within the entrance lobby and 1970's extension. The others propose re-arranging the existing space, as well as the addition of a new two-storey extension on the north side. Different configurations of the spaces are provided in each of the options.

Historic England appreciates the ambition of the parish to extend its mission and provide a building that can be used by all in the community. We also agree that the best place for any extension would be on the north side, as the south side is much more open to view from the churchyard and the wider conservation area.

However the north wall of the Nave is the oldest surviving wall of the church and contains four stained glass windows, and most importantly, two of which are by Burne-Jones. The statement of significance highlights that the 11<sup>th</sup> and 12<sup>th</sup> century fabric in the church and the link with Burne Jones and the glass by William Morris are of outstanding significance.

A large extension such as under Options D and F will cover most of the oldest surviving wall which will be no longer open to view by the public from the churchyard and will therefore cause some harm to significance. However, our main concern with the larger extension options is the potential to reduce the amount of natural light directed through the stained glass of the Burne-Jones windows. This could therefore cause harm to their special qualities and the way they are appreciated and enjoyed by the public. Whilst the supporting information suggests that the larger of the two windows could be relocated eastwards to remain external, this would mean that the two Burne-Jones windows would no longer be seen adjacent to one another, would have different levels of lighting and one would not be its original location. We therefore do not think this would be a suitable compromise.

Before we could determine whether we could support a larger extension, we would

need to be confident that the proposals would not have any overly harmful impacts on the Burne-Jones windows. We therefore recommend that an assessment of the impact of the extension on light levels is carried out, including demonstrating that an extension that provided a glazed link or the introduction of large areas of glazing in the roof design would minimise any harmful impacts.

We do not object in principle to the re-opening of the door in the north wall to provide a better connection between the new facilities and the main body of the church. We would however wish to see an internal elevation drawing regarding how this will appear in relation to the lancet windows either side before we could confirm our views on this.

In terms of the options presented, we consider that Option B would provide kitchen facilities in a convenient location, would cause the least harm to the significance of the church and would also be fairly cost effective. In terms of the extensions, the smaller extensions (Option C and E) would not impact on the important Burne-Jones windows and would enable more of the ancient wall to be appreciated. However we recognise that that this size of extension may not be overall as a good value for money as a larger extension and would not fulfil all of the longer term ambitions of the parish. We think that the larger extension options (D and F) may have the potential to cause some harm to the significance of the Burne-Jones windows and therefore, as mentioned above, recommend that further assessment is carried out to establish what this level of harm might be and ways it can be mitigated through design.

This is an ambitious project and we agree with the DAC in their informal advice that the parish may like to consider a phased approach to providing these new facilities; starting with the internal reordering and the re-arrangement of the spaces within the existing facilities, as set out in Option B. This would allow the parish to trial using the building in a more flexible way to increase its mission. It could then work towards the most appropriate form of extension for its needs that balances the harm against the public benefits.

There will be impacts on archaeology both internally from the provision of the new floor and externally from the new extension. We therefore recommend consultation with the DAC's Archaeological Advisor and the County Archaeologist.

Thank you for involving us at the Pre-application stage. I trust the above comments are helpful in developing your application for faculty and planning permission. If I can offer any further assistance on this case, please do not hesitate to contact me again.  
Yours sincerely,



Alma Howell  
Inspector of Historic Buildings and Areas

## 8.4 Appendix E



St Margaret's  
Church

Extension and re-  
ordering



## 8.5 Appendix F



St Margaret's  
Church

Extension and re-  
ordering