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Planning
South Downs National Park Authority
South Downs Centre
North Street
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West Sussex GU29 9DH

16th April 2024

Dear Sir/Madam

Roedean School, Roedean Way, Brighton, BN2 5RQ
Proposed Installation of Handrail in Front of Stone Balustrade

On behalf of our client, Roedean School, we are applying to the South Downs National Park Authority for listed building consent for the installation of a handrail in front of an existing stone balustrade at the front of Roedean School. The purpose of this letter is to provide further information on the project and to confirm the documents that form part of the application submission.

The Application Site

The application site is located in a countryside location, within the South Downs National Park. Roedean School is Grade II Listed and occupies a prime position along the south coast adjacent to Brighton overlooking the sea. Roedean School was listed Grade II on the 26th August 1999 under the name 'Roedean Main School Buildings' (List entry Number: 1380831). The initial school buildings were designed by the architect John W Simpson with others added to the site also by Simpson, working with Maxwell Ayrton. The specific buildings noted in the list description comprise school house, art, music and library wing, headmistress house and chapel. Additional protection may also be afforded to buildings not specially mentioned in the list description due to their contribution to the setting of those that are.

The balustrade is located in front of the sundial as part of the front terrace at the entrance of Roedean School. The entrance to the school is set back to the rear of a courtyard or quadrangle flanked by the domestic accommodation (Nos. 1–4 School House). The group is bordered by the aforementioned terrace that is embellished in line with the entrance to the school by a semi-circular projection, a balcony and viewpoint labelled 'the bastion' on the original plans, defined by a stone balustrade, to which this application relates. The sundial is located to the rear of the bastion.

A heritage statement and impact assessment prepared by Maggie Henderson & Philippa Whitehill accompanies this covering letter. This heritage statement and impact assessment draws upon the work previously prepared by HB Archaeology & Conservation Ltd (HBAC) for Roedean School in order to place the application site location in its wider context.

The Balustrade and its Significance

The heritage statement and impact assessment confirms that much of the significance of Roedean School lies in the survival of the concept behind the design of the school: the way that the founders and their architects worked together to create a coherent facility that retains at its heart the near intact site plan of the late 19th and early 20th century school. The document confirms that the significance of the sundial and its nearby surroundings, including the balustrade, to which this application relates, is derived for the most part from its historic and spatial relationship with the school site, the role that it plays in the setting of the listed buildings and the connection with the architect, Sir John Simpson. Moreover, for further context the assessment states that *"the area of the balustrade was referred to by the navy as the 'Quarterdeck', a revered area within a shore establishment, the site of the flagstaff flying the Naval Ensign – the Quarterdeck must be saluted by naval personnel when passing as a mark of respect. The school's quadrangle doubled as a parade ground, the site of Sunday divisions (parade of ship's company before church) at which the men and women of HMS Vernon would be addressed by the Captain and inspected."* In addition to this, the enduring presence of the sundial and balustrade on the terrace, its location unchanged since the completion of the main buildings and its installation in 1899, has made it a feature and a focal point of the School site.

Please see the heritage statement and impact assessment for further information on the history of the application site's location and its significance.

The Proposed Works

The balustrade is in an extremely exposed position and has suffered from weathering over the course of its long history. Due to this, new handrails are proposed, of which will be new black painted steel rails and supports set off the existing balustrade to prevent people from leaning on or damaging the existing stone balustrade. The specification for decoration of the new steel railings is designed to and thus be entirely suitable for an extreme marine environment to which the application site is located at the front of Roedean School.

Please see the accompanying Design and Access Statement and drawings by Miller Bourne Architects for further information on the proposed handrails.

Planning Policy

South Downs Local Plan (adopted 2019)

Policy SD1 confirms that the National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. It adds that planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally: a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and b) There is substantial compliance with other relevant policies in the plan. Policy SD5 states that development proposals will be permitted where they contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern. Policy SD12 confirms that development proposals will be permitted where they enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss. Policy SD13 advises that listed building consent will be granted where proposals preserve and enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance is avoided.

National Planning Policy Framework 2023

Paragraphs 10 and 11 state that plans and decisions should apply a presumption in favour of sustainable development. Paragraph 195 advises that heritage assets are an irreplaceable resource

and should be conserved in a manner appropriate to their significance. Paragraph 200 confirms that when determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 203 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

Assessment

A Heritage Statement has been submitted in support of this application and draws upon the Heritage Assessment of Roedean School, carried out by HB Archaeology & Conservation Ltd for the wider School site in August 2014. In accordance with paragraph 200 of the NPPF, the submitted Heritage Statement identifies the significance of the balustrade, and the adjacent sundial. The sundial plays a very important role in the significance of the balustrade given its situation next to the balustrade throughout the course of its history. The Heritage Statement confirms that the significance of the sundial and its nearby surroundings, including the balustrade, is derived for the most part from its historic and spatial relationship with the school site, the role that it plays in the setting of the listed buildings and the connection with the architect, Sir John Simpson.

The proposed works seek to provide new handrails, which are to be set off the existing balustrade. The application site and its surroundings has suffered from the effects of weathering over the course of its long history. Consequently, the original form of the balustrade, which contained its greatest significance as an important heritage feature for Roedean School, has been degraded over time.

One of the key purposes of the South Downs National Park is to conserve and enhance its cultural heritage. It is noted from the Local Plan that there is a focus on identifying heritage assets which are considered to be at risk of irreversible harm or loss, and an encouragement for owners to maintain their heritage assets. We consider the proposed works to be a matter of urgency, and will provide greater protection to the balustrade, thus limiting the risk of irreversible damage.

The proposed works are to be set off the existing balustrade, and thus are not attached and entirely reversible. The proposed works seek to preserve the significance of the balustrade, by preventing people from leaning on or damaging it, and thus comply with Policy SD12. The proposed works are the minimum necessary to protect the significance of this important heritage asset for the school, whilst also maintaining its significance. No loss of historic fabric is to occur as part of the works. Consequently, the proposals comply with Policy SD13.

The works will secure the future of the balustrade, and in doing so preserve its character and significance in addition to the clear contribution made by balustrade to the setting of the listed and curtilage-listed buildings. It is our view that the proposed restoration works comply with all relevant policies within the Local Plan and the NPPF, and thus the application should therefore be approved by the Authority.

The Application

The following documents form part of this application submission;

- The required application forms;
- This letter;
- Design and Access Statement by Parker Dann;
- Heritage Statement by HB Archaeology & Conservation Ltd;
- Drawings by Miller Bourne Architects.

The proposed development is exempt from the mandatory biodiversity net gain requirements as it is classified as a development below the threshold as it does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and less than 5 metres of on-site linear habitats such as hedgerows.

I look forward to receiving confirmation of the registration of the application but should the Authority require any further information on this submission then please do not hesitate to let me or my colleague Tom Westerman know.

Yours faithfully

