

St Aubyns School Site

Planning Brief



BRIGHTON & HOVE CITY COUNCIL

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City Planning**

St Aubyns School Site

Planning Brief

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PART ONE

1. Introduction

This planning brief has been prepared to guide the future redevelopment of the former St Aubyns school site, High Street, Rottingdean. With the closure of the school the opportunity has been taken to establish the development parameters for this sensitive site which includes its ancillary playing field, the retention of the main school building and its chapel (a Grade II listed building).

The main purpose of the brief is to provide a planning framework that helps to bring forward a sensitive redevelopment on the site and achieves the following objectives:

- Making efficient use of the land and bringing forward a viable and deliverable scheme;
- Securing the re-use and ongoing maintenance of the listed building;
- Preserve the listed buildings and preserve or enhance the character and appearance of the Rottingdean Conservation Area and their respective settings; and
- Maximising the use of the existing playing fields for open space and public recreation

2. Status of the brief

Planning Briefs do not form part of the Local Development Framework (LDF) and so cannot be given full statutory weight. However, the guidance contained in this brief has been subject to public consultation and was approved by the Economic Development & Culture Committee of Brighton & Hove City Council as a material planning consideration in the assessment of future development proposals and planning applications relating to the site on 15 January 2015.

3. Background

This document has been prepared by Brighton & Hove City Council (the local planning authority) in partnership with Rottingdean Parish Council (the Parish Council) and with the engagement of the landowner at that time – the Cothill Educational Trust). The request for a brief to be produced for this site emanated from the Parish Council as a result of concerns expressed by local people about the future of the site, following the closure of the school in 2013. The Parish Council are currently undertaking the preparation of a

Neighbourhood Plan and were keen to see a planning brief produced which would guide the future development of this strategically important site within the Parish of Rottingdean.

The former school site and playing fields were acquired by the educational charity, the Cothill Educational Trust in April 2012. Following this, the Trust carried out various immediate improvements to the main school building to address some of its structural problems. However, the owners made the decision to close the school resulting in the school's eventual closure in April 2013.

4. Stakeholder consultation

Early consultation was conducted with Rottingdean Parish Council and the Cothill Educational Trust to establish their aspirations for the site. The feedback from these early stakeholder meetings helped to establish the preliminary development principles contained within the consultation draft planning brief.

Once agreed by the Economic Development and Culture Committee; the consultation draft planning brief was the subject of a public consultation exercise carried out during 8 September 2014 – 17 October 2014. Statutory consultees were included within this consultation. The results of this consultation have informed the final contents of this planning brief.

PART TWO

5. The site

Location

The site is located in the heart of the historic downland village of Rottingdean, 6 km east of central Brighton (see Fig 1). The village nestles within a north-south aligned valley which provides shelter from the prevailing southwesterly winds. Rottingdean is accessible by public transport and is served by several bus services (2, 12, 14, 27, 47, 57, 76, 84 and 116). The number 2 service stops in the High Street, while the 12, 14 and 27 services stop at the White Horse public house in Marina Drive, which is a 5 minute walk from the site.



Fig 1 - St Aubyns school site (Source: Local View)

St Aubyns school site

St Aubyns school is a Grade II listed building located in its own grounds on the eastern side of the High Street within Rottingdean Conservation Area. The site incorporates playing fields to the rear of the school buildings, separated from the main school campus by a twitten. As well as the main school buildings and its chapel, the boundary flint wall fronting the High Street is also a Grade II listed structure. The main entrance to the school is approximately 84 metres from the junction between the High Street and Marine Drive (A259). The school is currently accessed from the High Street via a narrow opening in the boundary flint wall onto a gravel forecourt, which provides limited off street parking for visitors.

Topography

The topography of the site presents an interesting design challenge due to its location on a sloping hillside that rises west to east from the valley floor. There is a level change of 5 metres between the school's main building and the middle of the playing fields, which will need to be addressed in the future redevelopment of the site. This change in levels accounts for the predominance of garden terracing to the east and rear of the school building.



Terraced gardens to the east of the school building

Planning history

Since there has been a school on this site for over two centuries, the planning history has been relatively simple and relates to:

- improvements and/ or alterations to the existing Grade II listed school building and Chapel;
- tree works (i.e. lopping) within the Conservation Area; and
- the construction of new accommodation, classrooms, gymnasium etc. in the grounds of the school.

The most recent planning application (BH2008/02986) associated with the site was approved by the Local Planning Authority in 2008. Planning permission was granted for the installation of a porous macadam tennis/ netball court on the school playing fields with fencing to the height of 2.75m.



St Aubyns School – 1927
(Source: Britain From Above 1919-1953)



St Aubyns School playing fields – 1927
(Source: Britain From Above 1919-1953)

6. Development area

Development area

The site size is approximately 3.4Ha. Although physically divided by The Twitten, the whole site is in a single use. Thus the entire site (including the playing field) is regarded as being within the curtilage of the listed building.

School campus

The school campus area (comprising approximately 0.86 Ha) is within Rottingdean Conservation Area and includes:

- the main school building (early 19th Century) at 76 High Street and its adjoining Chapel (Grade II listed);
- the listed boundary wall fronting the High Street (Grade II listed);
- a row of internally linked terraced cottages adjacent to but facing away from Steyning Road (pre-1948 and curtilage listed);
- other outbuildings associated with the school (circa 1980-1995) i.e. classrooms, dormitories, gymnasium, changing rooms, Headmaster's residence etc.;
- an outdoor swimming pool;
- shooting range (pre-1948 and curtilage listed);
- terraced gardens;
- equipped children's play area; and
- three trees with Tree Preservation Orders.

All pre-1948 structures within this site are curtilage listed and the front boundary wall and main St Aubyns building are listed at Grade II for their special architectural or historic interest.

Playing field

The existing playing field is approximately 2.5Ha in size and is located within the immediate setting of Rottingdean Conservation Area, acting as a green buffer and perceived visual distinction between the historic village and later suburban development. It includes:

- sports pavilion (pre-1948 and curtilage listed);
- war memorial (pre-1948 and curtilage listed);
- water fountain (pre-1948 and curtilage listed); and
- 2 tennis courts with associated net fencing and cricket nets.

The boundary treatment is largely a mixture of wooden fencing and bushes, with a bank of sycamore trees on the western boundary. There are a number of gates and entry points which are secured. There is no general public access to this field, although a number of local sports clubs have up until recently used the playing fields on an appointment basis. These include Rottingdean Cricket Club who used the cricket field for their third team matches and junior matches during the season and the Sussex Bowmen (a local archery club) who used the playing fields on occasional Sundays.

Sport England is a statutory consultee for any development proposals which affect playing fields. Early engagement with Sport England is recommended, and the advice they have provided on the specific matters raised by this planning brief is contained within Appendix 1.

7. Development principles

The vision for this site is to deliver a high quality and sustainable redevelopment which respects the character of the existing heritage assets and the recreational opportunities arising from the existing open space

Development objectives

Heritage

- To breathe new life into this listed building in the heart of Rottingdean village.
- To preserve those features that contribute to the special interest of the listed building.
- To encourage new development of the highest design standard, by preserving and enhancing the character of the conservation area and setting of the listed building.

Open space and recreation

- To preserve or enhance existing open space for public use, thereby making effective use of its central location within the heart of Rottingdean village.
- To encourage public use of existing open space for outdoor recreation in order to secure improvements in the health and social well being of the local community.

Place making

- For new buildings to be of high quality design, layout, scale and massing – combining to form a coherent, legible and accessible development cluster focussed around the former school building.
- To provide a high quality public realm, including a series of successful social and green spaces at the heart of the development area.

Sustainability

- To deliver a development that mitigates and adapts to climate change and incorporates high levels of energy efficiency, efficient services and sensitively integrates low and zero carbon technologies into the refurbished and new build elements.
- To achieve BREEAM 'excellent' for the refurbishment of the listed building, subject to heritage requirements and technical feasibility.

8. Heritage considerations

A History of the site is included in Appendix 2. Given that the site lies within a conservation area and includes listed and curtilage listed buildings; developers will need to engage with the council's Heritage team at the earliest opportunity i.e. during the pre-application stage. English Heritage will also be a statutory consultee in any future planning application associated with the site. Its comments on development proposals, as well as the views of

the council's Heritage Team, will be afforded significant weight during the determination period.

Listed and curtilage listed buildings

There are numerous listed and curtilage listed buildings/ structures located on the site (see Fig 6). St Aubyns school (which includes the Chapel as part of the main building), is a Grade II listed building located in its own grounds on the eastern side of the High Street within Rottingdean Conservation Area. The boundary flint wall fronting the High Street is also a Grade II listed structure.

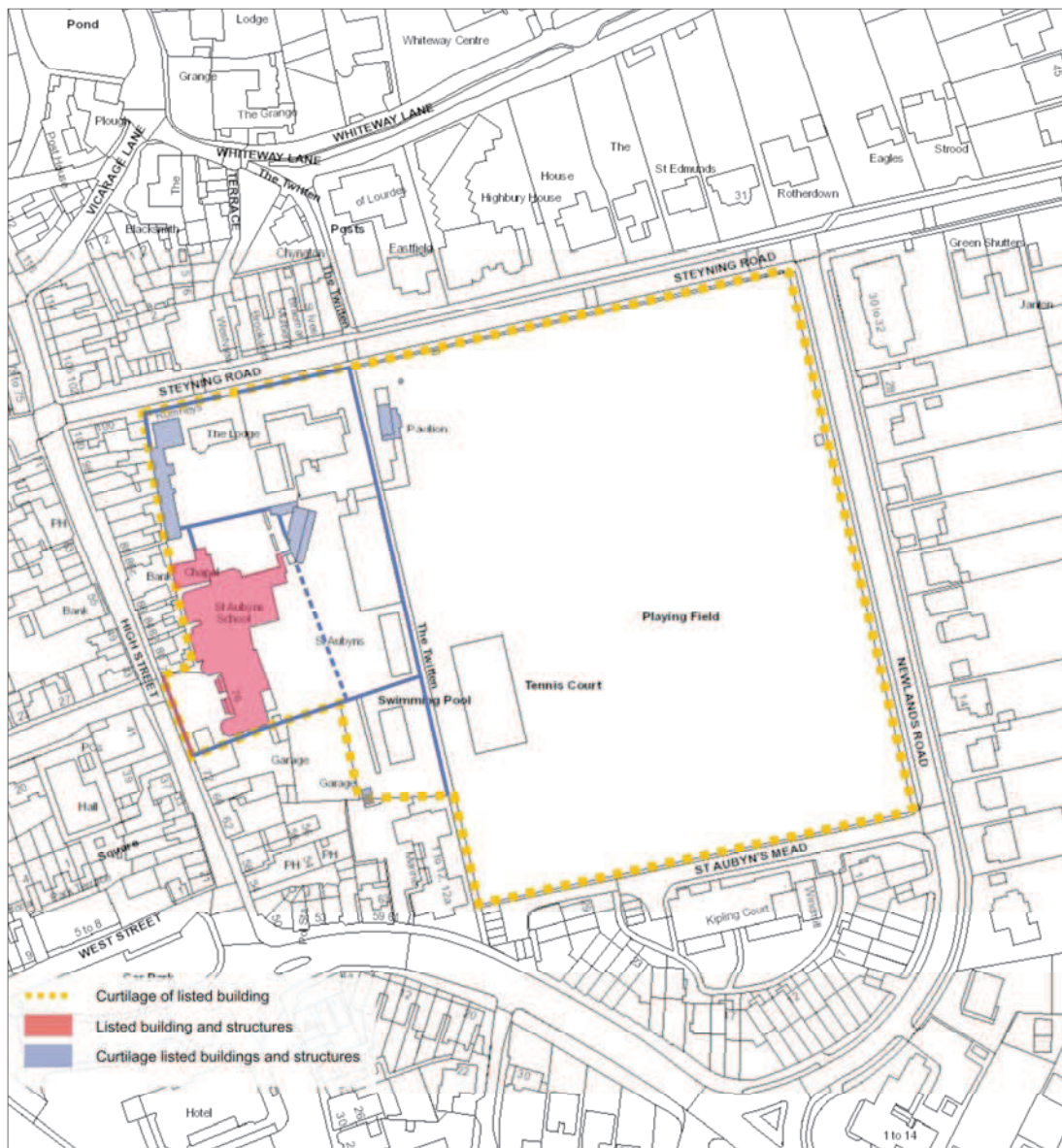


Fig 2 – Listed and curtilage listed buildings/ structures (also showing area within the curtilage of the listed building)

All buildings and structures on the site that were built before 1948 and were in associated use at the time of listing are considered curtilage listed. The curtilage of the listed building therefore includes both the school site and playing fields, given that they were in associated use at the time of listing.

The curtilage listed structures on the site include:

- Flint walls, including those along the Twitten, and Steyning Road, and those flint walls within the site itself;
- Rumneys and the group of terraced cottages;
- 'Link' building;
- Shooting range structure;
- Sports pavilion;
- War memorial; and
- Water fountain.



Grade II listed flint wall on western boundary



Curtilage listed terraced cottages



Curtilage listed sports pavilion



Curtilage listed war memorial

Listed buildings and curtilage listed buildings are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. Listed building consent is required to demolish a listed building or curtilage listed building, or to alter or extend it in a way that affects its significance as a building of special architectural or historic interest.

Conservation area and its setting

The school campus site is located within the Rottingdean Conservation Area. Rottingdean Conservation Area was designated in September 1970 and comprises the core of the historic village, including the High Street and The Green, and is flanked by green spaces to the east and west. The conservation area contains 54 listed buildings, eight locally listed buildings and an archaeological notification area.

The Conservation Area boundary runs along the Twitten but excludes the playing fields. Nevertheless, the playing field is considered an important part of the setting of the conservation area as established in the Rottingdean Conservation Area Character Statement. It provides a reminder of the once rural setting of the village and a distinction between the historic village and surrounding suburban development.



The Twitten



The flint and brick wall along Steyning Road

Fig 3 – Strategic views (Source: Rottingdean Conservation Area Character Assessment)



Key

-  V1 Indicative location of Important View
-  L1 Important Landmark
-  S3 Web of Twittens & Footpaths
-  Vegetative cover
-  Conservation Area Boundary
-  Important space
-  Main Gateway to village/Consevation Area

The views to and from Beacon Hill are identified as key strategic views within the Character Statement (see Fig 3). Views V1a and V1c (see Fig 4 and Fig 5) are most relevant to the site. Policy HE6 of the Local Plan applies to sites both in the conservation area and in its setting.



Fig 4 - View V1a of Beacon Windmill and playing field from Newlands Road



Fig 5 – View V1c of St Aubyns, its playing field and Beacon Windmill from Beacon Hill

The Twitten is identified as an important spatial feature in the conservation area. It is bounded by a hedge to one side and a flint wall to the other. The delineation of The Twitten provided by these boundaries is important. As well as being curtilage listed, the flint and brick wall to the Steyning Road boundary is an important part of the character of the conservation area. It helps to delineate the boundary to the school site as well as differentiate public and private space.

Archaeology

The school campus site up to The Twitten is included in an archaeological notification area. The playing field is set in the immediate vicinity of this archaeological notification area. Developers would therefore be expected to consult the County Archaeologist on any proposal for the site and/ or playing field and be aware that there may be a requirement for archaeological fieldwork to better understand the site prior to a planning decision being made.

Built heritage assessment

A Built Heritage Assessment is required for the site in its entirety. This should outline the historic development of the site before identifying the special interest and significance of the site as a whole and of its constituent parts. The Assessment should inform the development of proposals for the site. Dependent on the level of change proposed, a historic building record may also be required ahead of any redevelopment of the site.

Subject to the findings of the Built Heritage Assessment, development proposals should have regard to the heritage guidance contained in Appendix 3 and to the following considerations:

- The Grade II listed main building (including chapel), listed boundary wall and the curtilage listed buildings should in principle be repaired and retained. Strong justification would be required for the loss of the whole or any part of a listed or curtilage listed building, based on the findings of the built heritage assessment
- The green space adjacent to the chapel (including Mulberry Tree) and croquet lawn should be retained as part of any redevelopment.
- There are a number of historic walls and buildings which divide the site into discrete spaces, many of which are curtilage listed. This 'courtyard' character should be preserved and enhanced.
- Surviving historic external and internal features to the main building should be retained. The most appropriate way of achieving this would be for the building to remain as a single unit. However, there may be some potential for subdivision to

provide a viable scheme. This would need strong justification and, as far as possible, be sympathetic to the original plan form and circulation routes.

- The continued role of the existing playing fields as an open green space, acting as a buffer between the historic village and surrounding suburban development.
- Any proposed new development will be within the curtilage of the listed building, and the setting of both the listed building and the conservation area. It therefore will need to be sensitively designed, of an appropriate scale and massing and the visual impact (including strategic views V1a and V1c) will need to be minimised. It should remain deferential to the main listed building.
- For those parts of the site where development may be considered acceptable, it is likely that 2 storeys with attic would be an acceptable maximum height, dependent on design and topography.

9. Site constraints and opportunities

Given the significant heritage considerations and site constraints, development proposals must have regard to the following:

- The relevant planning policies and statutory designations which relate to the site;
- The need to preserve the setting of the listed building;
- The need to retain in principle the listed/ curtilage listed buildings identified in Fig 2 as well as other key features of the site;
- The need to preserve or enhance the character and appearance of Rottingdean Conservation Area;
- The height and massing of proposed development must be in keeping with the existing context and take account of key strategic views in and out of the site (see Figures 3, 4 and 5);
- The potential to bring forward open space for sport and recreation use for members of the public
- The opportunity to meet any new sports facility needs on site from additional residential units created as part of any redevelopment proposals;
- The need to ensure the proposed uses for the site complement existing uses within this part of Rottingdean;
- The need to address the existing poor permeability and accessibility of the site;
- The need to reference the existing materials palette, architectural style, building forms and landscaping; and
- The need to ensure all development proposals meet the objectives of Submission City Plan policy CP8 as amended by the Proposed Modification Schedule [October 2014](#) and SPD 08 Sustainable Buildings.

The constraints and opportunities for the future redevelopment of the site have been captured in Fig 6. Developers should ensure that their proposals respond positively to the design challenges posed in Fig 6 and ensure that their approach to the redevelopment of the site is design-led.

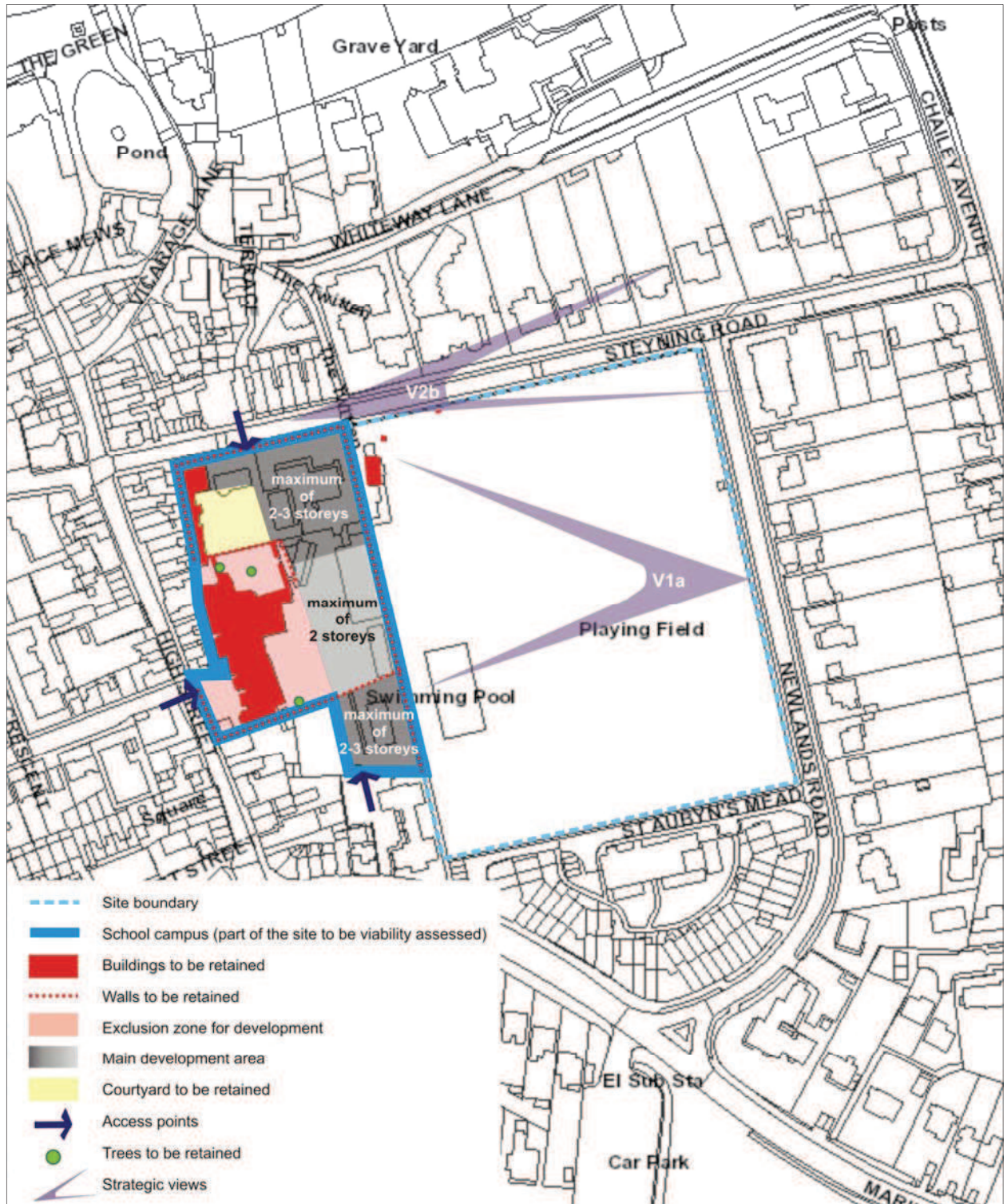


Fig 6 – Constraints and opportunities for development

10. Land uses

Existing land use and permitted changes

As a boarding school, St Aubyns falls within **Class C2 ‘Residential Institutions’** of the planning Use Classes Order 2010. Other C2 uses could operate from the buildings without the need for planning permission. Such a use (or uses) might include any of the following:

- Residential care homes, including establishments supporting ex military personnel
- Hospitals
- Nursing homes
- Residential colleges
- Training centres

Redevelopment proposals involving any of the above uses and which seek the removal of ancillary buildings and/or the development of new buildings would require further planning permission and listed building consent but not a change of use planning application.

Non-residential education and training centres

The reuse of the site as a school (without an element of boarding) would fall within **Class D1 ‘Non-residential institutions’** of the Use Classes Order 2010. A proposal of this nature would require a planning application to be made for a change of use from Class C2 to D1. Such a change of use would be viewed sympathetically by the City Council due to the site’s longstanding use as an educational facility and as a use sympathetic to the special interest of the listed building and the playing field. The change of use would also comply with local plan policy HO20 ‘Retention of Community Facilities’.

Dwelling houses (Class C3 of the Use Classes Order 2010)

Planning policy context

There is a “presumption in favour of sustainable development” enshrined within the National Planning Policy Framework (NPPF). One dimension of sustainable development is the protection and enhancement of the historic environment. Another is to provide sufficient housing to meet the needs of present and future generations. The NPPF requires that housing applications be viewed in the context of sustainable development unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

The principle of residential use of this site within a scheme that acknowledges and respects the significance of the heritage assets present in and around the whole site as well as the presence of the playing field would, therefore, be acceptable. In this respect,

the core aspects of any residential proposal would be expected to meet the following objectives:

- the reuse and retention of St Aubyns listed school building (itself originally built as a residence) and curtilage listed cottages;
- sympathetic new development of the remainder of the campus site as defined in Fig 6; and
- development which takes account of the strategic views across the playing field (see Fig 3).

Ensuring viability and deliverability

It is important that the requirements of planning briefs are realistic and deliverable, otherwise it is possible that unrealistic expectations are formed which may result in the promotion of schemes which are not viable, introducing delays into the development process. However, this should not be to the detriment of heritage assets, a point which is reinforced within paragraph 132 of the NPPF:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation... Significance can be harmed or lost through the alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification”

Developers will therefore need to provide clear and convincing justification for any harm caused to heritage assets as a result of putting forward a viable scheme. In these circumstances, the local planning authority would need to assess whether the benefits arising from the proposed development outweigh the harm caused to heritage assets and/or the departure from policy.

Furthermore, Paragraph 74 of the NPPF is also to be considered in regard to the existing open space, sports and recreational buildings and land, including the playing field.

Other acceptable ‘in principle’ uses

- Hotel
- Health centre/ spa
- Employment uses other than Class B1 offices which do not exacerbate transport problems

11. Height and massing

The predominant building height in the area is two to three storeys. As indicated in Fig 6, height of new development must not exceed the indicative heights shown on the diagram and must be much lower to the immediate east of the listed building to protect the relationship between the main building, its immediate curtilage and the playing field. Developers will also need to ensure that their proposals respond to the significant changes in level from west to east across the site.

The entire school campus is effectively contained within flint walls and The Twitten. The massing of any development proposal should assist in providing a sense of enclosure and containment in recognition of the character of existing development, which is organised around a series of courtyards and garden terraces. Neighbourhood context and the relationship to the listed and curtilage listed buildings on site should be the predominant influences on the scale and form of future development.

12. Sustainability

The One Planet Living objectives (see Appendix 1) are an aspirational set of principles which should be used to guide the design of development proposals for the St Aubyns site and its future operation and use. The combination of historic and new buildings; the integration of open green areas; proximity to Rottingdean Village as well as the site's potential for including community uses provides a significant opportunity for the development of an innovative scheme which embraces the One Planet principles.

All development proposals are required to incorporate sustainable design features to help deliver reductions in greenhouse gas emissions, particularly CO₂ emissions, and to mitigate against and adapt to climate change. Local Plan policies SU2, SU13 and SU16 and CP8 of the Submission City Plan Part One (currently subject to Proposed Modifications PM085 – PM089 inclusive) promote efficiency of development in the use of energy, water, materials and the sustainable management of waste. Supplementary Planning Document 08: Sustainable Building Design and its associated checklist outline the minimum standards in relation to sustainable design which will be expected on the site. These refer to standards around energy and carbon dioxide emissions, water use, use of materials and building benchmark standards.

Energy efficiency

The size of the site offers good opportunities for the integration of renewable technologies within the design of any development proposal. The existence of historic building assets will have an influence on the suitability of technologies but need not mitigate against an energy strategy that is highly sustainable and could deliver a zero carbon scheme. The historic buildings may be responsible for a relatively high energy use and carbon footprint.

However, the sustainable refurbishment of historic buildings can improve performance without detracting from the historic value, providing special attention is paid to developing an energy strategy that suits the heritage asset. For example, where windows are being reinstated with timber hung sash windows matching the historic windows, the highest thermal performance should be sought. Developers should familiarise themselves with English Heritage's technical and practical guidance on improving the energy efficiency of historic buildings referred to in Appendix 1.

The energy strategy for this site should include a feasibility study to examine the following:

- the sustainable refurbishment of the historic buildings;
- the potential for renewable technologies; and
- the potential for a site district heating network.

The following performance benchmarks are expected to be achieved. There is emerging national evidence that achieving high standards of sustainability can increase the profitability of private sales.

Building standards

BREEAM is a tool used by the local planning authority for assessing the sustainability of development schemes. It sets the standard for best practice in sustainable building design, construction and operation and has become one of the most comprehensive and widely recognised measures of a building's environmental performance.

- **BREEAM refurbishment 'excellent' rating** for any converted/ refurbished buildings, including all listed and curtilage listed buildings on site. Due to the existence of historic assets, the use of sustainable, traditional, natural and, ideally, local materials to deliver breathable solutions whilst improving thermal performance is particularly encouraged. Clear justification will need to be provided if this rating cannot be achieved.
- **BREEAM new build 'excellent' rating** for any new development on site.
- **Code for Sustainable Homes Level 4 or equivalent** for all new build residential units, including those within mixed-use developments. For schemes granted permission after 2016, the requirement will rise to Code Level 5 or equivalent.
- **Lifetime Homes standards** for all new housing development, in accordance with the requirements of policy HO13 of the Local Plan and CP12 of the Submission City Plan. Any new development should be fully accessible to all sections of the community, including people with disabilities. Five per cent of housing units should be built to wheelchair accessible standards, including 10% of affordable housing units.

Development proposals should also follow best practice in terms of the inclusive design principles as set out in the Lifetime Homes Design Guide (November 2011).

However it should be noted that the above sustainability standards will be subject to the government's ongoing housing standards review.

Sustainability checklist

A sustainability statement and a completed Brighton & Hove Sustainability Checklist will be required as part of the planning application. In the case of outline applications, a condition will be attached requiring these at reserved matters stage i.e. when the details of the planning application are being considered, and a Section 106 legal agreement will provide for any mitigation measures.

Other sustainability measures

The large playing fields and grounds of the school offer opportunities for enhancement and improvement. The following measures could be incorporated within a future scheme subject to heritage and viability criteria being met:

- Biodiversity enhancements
- Greening of buildings (green roofs and walls)
- An orchard, planting of additional fruit trees on site
- Food growing areas/ community allotment or food growing plot
- Community allotments
- Community composting area
- Rainwater harvesting and sustainable drainage systems
- Employment of a sustainability caretaker for the site to undertake post occupancy evaluation and ensure that the energy, water and other systems are working efficiently, users are making the best use of the buildings and space and that there is ongoing reduction in the ecological footprint.

13. Open space and ecology

Playing field

The existing playing field presents an opportunity to optimise the provision of outdoor space and recreational activity for members of the public within the heart of Rottingdean village. Up until the school's closure, the playing field hosted sporting activities associated with the school, although other sports clubs such as the Rottingdean Cricket Club were allowed to use it with prior agreement from the owners.



Cricket practice nets



View of playing field and tennis courts

An important objective of this planning brief is to secure the public use of this existing open space for the local community in any future redevelopment proposals for the site. Sport England has provided advice on community use agreements or other legal agreement it would expect to see in order to secure community access to the playing field in the future, as well as matters to be covered within such an agreement, and this is contained in 'Appendix 1.

Once a planning application is submitted, Sport England will consult National Governing Bodies for Sport and request information regarding the sporting needs of clubs within this area to inform the development of facilities. Furthermore, any proposals for residential development at St Aubyns should meet any resulting new sports facility needs arising from the scheme.

Sport England advises that the creation of ancillary facilities such as parking, changing rooms and shower facilities may be required to increase community use of the playing field and make it viable. As the open space also contributes positively to the character of the conservation area and provides the setting for strategic views across the site as shown in Figures 3, 4 and 5, the landscape associated with the proposed redevelopment of the site including any ancillary recreation or community facilities required should be an intrinsic element of the overall design concept

Campus site

The campus site contains important open spaces and 3 trees subject to individual Tree Preservation Orders shown on the constraints map (Fig 6). The open space to be retained on the campus site includes the terraces, spaces around the main listed building and the courtyard adjacent to the curtilage listed terraced cottages.

Landscaping

The appropriate use of soft landscaping, as well as good use of planting and climbing foliage, all assist in providing a contrast to the built form. Any new landscaping should have regard to existing wildlife habitats and the ecology of the area in accordance with CP10 Biodiversity in the Submission City Plan. New materials should complement the existing built form and natural landscape, with an emphasis on quality and detailing in accordance with Appendix 3.

14. Transport, access and parking

Air Quality

In 2013 an area of the High Street between the A259 and the T-Junction with Vicarage Lane was designated an Air Quality Management Area (AQMA). Therefore, improvements to local air quality on this section of the High Street are a priority. New development proposals should take account of their impact on local air quality, be consistent with the Council's Air Quality Action Plan. Improvements and/or mitigations will be sought wherever possible.

Transport Assessment

A Transport Assessment will be required in line with national and local policies and should especially consider the AQMA, opportunities for supporting sustainable transport modes and possible traffic management amendments.

Strategic Road Network

The Highways Agency is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) and considers that The A27 trunk road is relevant to this site. Whilst the A27 is some way from the St Aubyns there are existing congestion issues during peak periods around The Drove and the Falmer interchange which will provide the closest north / south access route between the St Aubyns site and the A27. The Highways Agency will require a proper assessment through transport modeling of the relevant A27 junctions which takes into account the cumulative effect of redevelopment proposals at this site with other developments which have either been recently approved or are currently proposed. The Highways Agency is in a strong position to provide advice to prospective developers and to agree the methodology to be used in developing and submitting the necessary supporting documents due to the wealth of information and knowledge they hold about the operation of the SRN and its interaction with local roads.

High Street

The current access to the school campus site is via a single vehicle width ingress/ egress, leading directly off the High Street into a small car parking area. This access point is both inadequate and challenging for vehicles exiting the car park, since visibility is obscured by the high listed wall and the two storey house flanking the exit. Since the High Street is an existing local shopping centre and Class B road with heavy pedestrian and traffic flows, it is important that development proposals seek to improve visibility in order to comply with present day road safety standards. Whilst this access point is currently sub-standard in terms of visibility, its re-use for a comparable level of movement would not be ruled out. However, improvements to visibility would be encouraged in accordance with the Manual for Streets national guidance, providing these did not compromise the status of the flint wall as a listed structure.

A review of alternative access points to the site has been undertaken by the council's Transport team. This exercise has revealed three access points to the site from: Steyning Road , Marine Drive and St Aubyns Mead. The advantages and disadvantages of each access point are examined in more detail below.



Existing access to the main school building, the High Street



Small car parking area

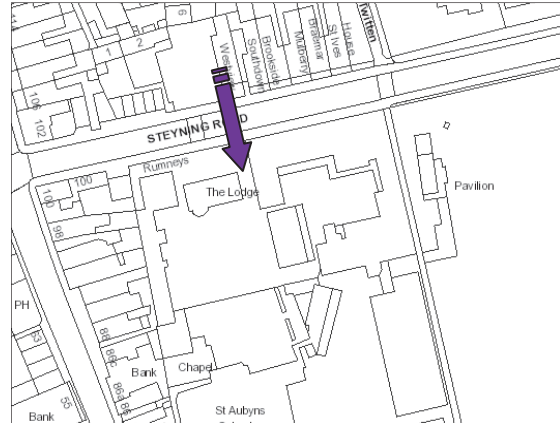
Steyning Road

This is the preferred access point to the site and would allow for a two vehicle width ingress and egress, if the headmaster's house was demolished (see Fig 7). However, Steyning Road is quite narrow due to the existence of dedicated parking bays for residents and visitors on the southern side of the road. It will therefore be important that proposals

include enhanced visibility for vehicles leaving the site. Any proposed demolition of the flint boundary wall should be kept to an absolute minimum.



Steyning Road and school campus (Source: Google maps)



Potential access point



Headmaster's house and driveway (off Steyning Road)

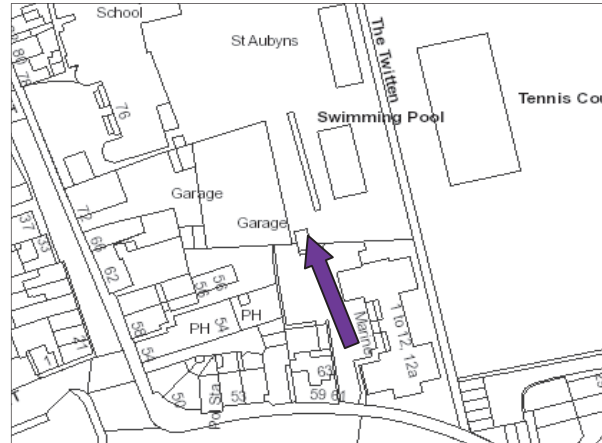
Fig 7 – Potential two vehicle access point to site from Steyning Road

Marine Drive

There will be a presumption against the creation of an access point at Marine Drive (the A259) with particular concerns from the proximity of the access point with the signalised junction to the west (i.e. the intersection of Marine Drive with the High Street). This junction experiences traffic queues during peak travel periods which could be further exacerbated, depending on future uses of the site. However, there may be scope to explore the provision of emergency access to facilitate the ingress of emergency vehicles only. The significance of any curtilage listed structure should be established and a robust justification provided for any demolition, if this is proposed as a new access point for the site.



Marine Drive and school campus (Source: Google maps)



Access point from Marine Drive

St Aubyns Mead

This is the least favourable access point. Nevertheless, if developers are able to demonstrate that it is required as part of a successful redevelopment of the site, then a single vehicular access point north of the existing turning point at the western end of St Aubyns Mead may be acceptable. This would necessitate the removal of part of the perimeter of the playing field (currently defined by bushes/ fencing) as well as breaking through the flint wall of the existing Twitten, which is curtilage listed. Any proposed demolition of the flint boundary wall should be kept to an absolute minimum.

Emergency vehicle access

Development proposals must ensure that the internal and external layout of schemes, including the spaces around buildings, is designed so that emergency vehicles can access them at all times. Developers are therefore encouraged to undertake early liaison with emergency services during the design stage to avoid mistakes later on.

Parking

Information on parking strategies for individual development proposals should be included within their Transport Assessment and it should be noted that the council's parking standards are set out in policy TR19 of the Local Plan and SPGBH4 Parking Standards. These should be followed in development proposals for the site. The standards for residential development allow a maximum of 1 car space per dwelling plus 1 space per 2 dwellings for visitors. Proposals will also need to meet the minimum requirements for disabled and cycle parking. In any case, all development proposals will need to meet the requirements of policy TR1 of the Local Plan in encouraging more sustainable modes of transport by maximising the use of public transport, walking and cycling.

Parking areas should be carefully integrated into the design of any scheme. They should be designed to minimise their visual impact on the setting of the conservation area and the listed building, through such measures as incorporation of new planting and - where appropriate - exploring the use of shared surfaces. Given the constraints of the site, the LPA would encourage developers to consider the provision of carefully designed and lit basement and/ or undercroft parking with an emphasis on safety and security (i.e. Park Mark), particularly in respect of residential proposals.

15. Community infrastructure and planning obligations

In order to reduce the impact of new development and to make sure it does not place additional pressure on existing infrastructure such as roads, health or council services, the council's planning officers may seek contributions from the developer. These are secured through a 'Section 106' legal agreement or 'S.106 unilateral undertaking'.

The council's Developer Contributions Technical Guidance 2011 is relevant to future development on this site. It gives guidance on the following main types of contributions:

- Affordable Housing
- Local Employment and Training
- Education
- Open Space
- Transport and travel
- Sustainable Buildings
- Nature Conservation

As part of the negotiations for the provision of community facilities, the existing and future provision of youth facilities should be considered, as generated by development.

The council is currently considering whether to adopt a Community Infrastructure Levy (CIL) in respect of planning applications. The scope of what a CIL would cover is one of the issues under consideration and may affect future development contributions on this site.

Appendix 1 – National and local planning policies and guidance

Planning policy context

This brief has been prepared within the following planning policy context:

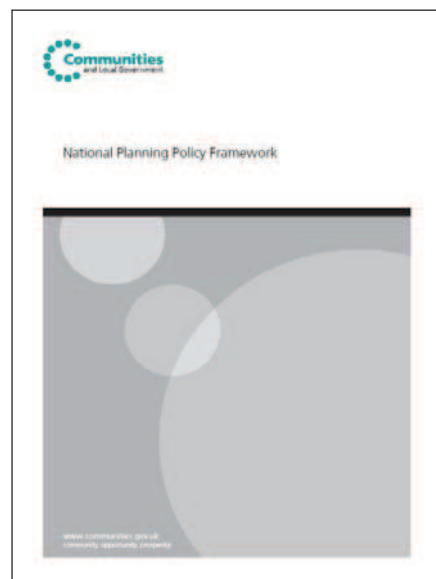
National policy context

Applications for planning permission must be determined in accordance with the local development plan unless material considerations indicate otherwise as set out in Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. The adopted Local Plan is the local development plan; the Submission City Plan Part One is an emerging development plan which is in a late stage of preparation. In conjunction with the NPPF, these documents are a material consideration in planning decisions.

National Planning Policy Framework (NPPF)

The NPPF, published in March 2012, sets out the Government’s planning policies for England and how these are expected to be applied. The framework requires each authority to work together with local communities to produce local and neighbourhood plans that reflect the needs of local communities. A Neighbourhood Plan for Rottingdean is currently being progressed by Rottingdean Parish Council with support from officers within Brighton & Hove City Council. The Draft Neighbourhood Plan includes reference to the St Aubyns school site. This planning brief supports the delivery of the NPPF’s objectives through promoting sustainable development and growth whilst considering the existing playing field and open space and securing the future of the heritage assets associated with the site. The latter is in accordance with paragraph 131 of the NPPF which states that:

“In determining planning applications, 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”.

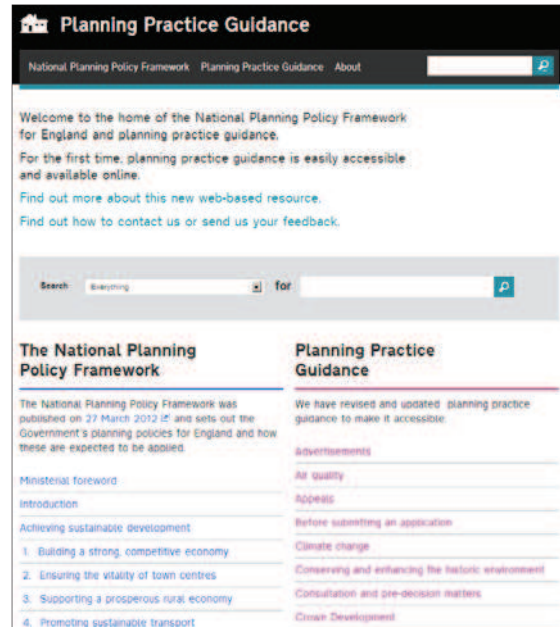


National Planning Policy Guidance 2014 (NPPG)

The NPPG is intended to support the National Planning Policy Framework and to provide practical guidance for the implementation of the framework.

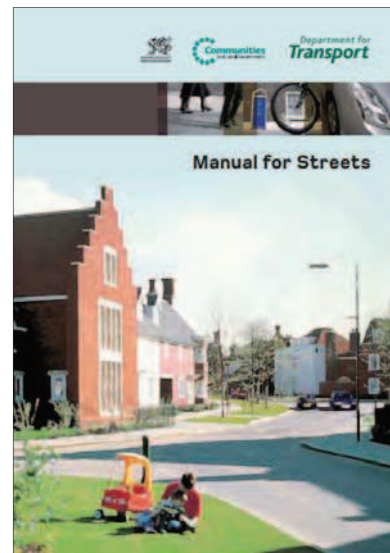
The NPPG covers a very broad range of planning issues and the guidance is divided into 38 separate topics arranged alphabetically. Topics relevant to the St Aubyns school site include:

- Conserving and enhancing the historic environment; and
- Open space, sports and recreation facilities, public rights of way and local green space.



Manual for Streets

The Manual for Streets, published in 2007, focuses on the place function of residential streets, giving clear guidance on how to achieve well-designed streets and spaces that serve the community in a range of ways. It challenges some established working practices and standards that are failing to produce good-quality outcomes, and asks professionals to think differently about their role in creating successful neighbourhoods. This planning brief supports the delivery of the MFS's objectives through promoting enhanced accessibility and road safety at the design stage.



Local policy context

Local Plan (2005)

The NPPF explains that full weight can be given to relevant policies, which includes “saved” policies adopted since 2004, for 12 months from the date of publication, even if there is a limited degree of conflict with the NPPF. After this 12 month period, where Local Plan policies have a degree of consistency with the policies in the NPPF, due weight can be given to them.

At the time of writing the Brighton & Hove Local Plan (2005) is the adopted local development plan for the city and covers the area identified in this brief. The policies which are particularly relevant in informing this brief are below.



Relevant Local Plan (2005) Policies

Historic environment

- **HE1** – Listed buildings
- **HE2** – Demolition of listed building
- **HE3** – Setting of listed building
- **HE4** – Reinstatement of features
- **HE6** – Conservation area
- **HE8** – Demolition in conservation areas
- **HE12** – Archaeology

Community facilities

- **Policy HO20** – Retention of community facilities
- **Policy HO19** – New community facilities

Housing

- **Policy HO2** – Affordable housing – ‘windfall’ sites
- **Policy HO3** – Dwelling type and size
- **Policy HO4** – Dwelling densities

- **Policy HO5** – Provision of private amenity space in residential development
- **Policy HO6** – Provision of outdoor recreation space in housing schemes
- **Policy HO11** – Residential care and nursing homes
- **Policy HO12** – Sheltered and managed housing for older people
- **Policy HO13** – Accessible housing and lifetime homes
- **Policy HO15** – Housing for people with special needs

Sustainable development

- **Policy SU2** – Efficiency of development in the use of energy, water and materials
- **Policy SU9** – Pollution and nuisance control
- **Policy SU10** – Noise nuisance
- **Policy SU13** – Minimisation and re-use of construction industry waste
- **Policy SU14** – Waste management

Transport and movement

- **Policy TR1** – Development and the demand for travel
- **Policy TR2** – Public transport accessibility and parking
- **Policy TR4** – Travel plans
- **Policy TR5** – Sustainable transport corridors and bus priority routes
- **Policy TR14** – Cycle access and parking
- **Policy TR18** – Parking for people with a mobility related disability
- **Policy TR19** – Parking standards

Design and quality of development

- **Policy QD1** – Design – quality of development and design statements
- **Policy QD2** – Design – key principles neighbourhoods
- **Policy QD3** – Design – efficient and effective use of sites
- **Policy QD4** – Design – strategic impact
- **Policy QD5** – Design – street frontages
- **Policy QD6** – Public art
- **Policy QD7** – Crime prevention through environmental design
- **Policy QD15** – Landscape design
- **Policy QD16** – Trees and hedgerows
- **Policy QD20** – Urban open space

- **Policy QD27** – Protection of amenity

Recreation, leisure and outdoor space

- **Policy SR14** – New hotel and guest accommodation
- **Policy SR20** – Protection of public and private outdoor recreation space
- **Policy HO6** – Provision of outdoor recreation space in housing schemes
- **Policy QD15** – Urban open space
- **Policy QD17** – Protection and integration of nature conservation features
- **Policy QD20** – Landscape design
- **Policy QD26** – Floodlighting

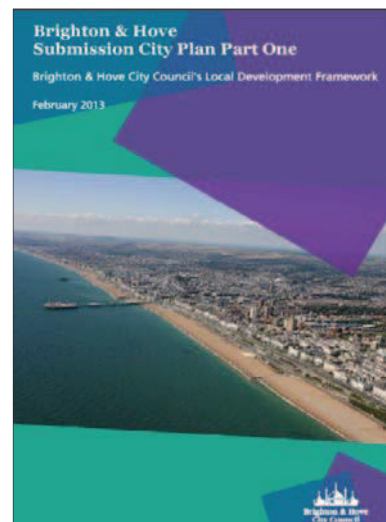
Planning obligations

- **Policy QD28** – Planning obligations

Local Development Framework

The Local Development Framework (LDF) is the official term used to describe the set of documents that will eventually replace all of the local planning authority's local development documents, including the Brighton & Hove Local Plan (2005).

The **Submission City Plan Part One** was submitted to the Secretary of State in June 2013 and has recently been through its Examination in Public (EiP). It will be a material consideration in the determination of any future planning applications associated with the site. The policies most relevant in informing this brief are listed below.



Relevant Submission City Plan Policies (2013)

- **Policy CP1** – Housing Delivery
- **Policy CP14** – Housing Density
- **Policy CP19** – Housing Mix
- **Policy CP20** – Affordable Housing
- **Policy CP2** – Sustainable Economic Development

- **Policy CP6** – Visitor Accommodation
- **Policy CP8** – Sustainable Buildings
- **Policy CP9** – Sustainable Transport
- **Policy CP10** – Biodiversity
- **Policy CP12** – Urban Design
- **Policy CP13** – Public Streets & Spaces
- **Policy CP15** – Heritage
- **Policy CP16** – Open Space
- **Policy CP17** – Sports Provision
- **Policy CP18** – Healthy City

It should be noted that the City Plan Part One is still under examination by an independent planning inspector and certain policies therein are subject to a Schedule of Proposed Modifications (October 2014). These proposed modifications seek to amend the policies within the Submission City Plan in light of the Inspector's initial conclusions letter (13 December 2013) and in response to submission consultation comments/ general update. The proposed modifications have recently undergone a formal consultation exercise. The Inspector will need to consider the proposed modifications and the consultation responses before she can conclude the examination.

Important Supplementary Documents

The council has also produced the following supplementary planning documents which are material considerations for the future redevelopment of the St Aubyns school site:

- **SPGBH 11** – Listed Building Interiors (this provides a general understanding about what is important to preserve and enhance in an historic interior).
- **SPD06** – Trees and Development Sites
- **SPD08** – Sustainable Building Design
- **SPD09** – Architectural Features
- **SPD11** – Nature Conservation and Development
- **PAN06** – Food Growing and Development
- **SPGBH9** – A Guide for Residential Developers on the Provision of Open Space (and the 2011 Update)

Architectural Features – SPD09

This Supplementary Planning Document (SPD) provides detailed policy guidance on the repair, restoration and enhancement of historic buildings. Although currently vacant, the St Aubyns school building is in a good state

of repair both internally and externally. However, it is important that the guidance contained in SPD09 frames the future redevelopment of the site, especially if it entails the conversion and/ or re-use of the existing school building. Any new development proposed within the curtilage of the listed building/s will also need to be sensitively designed in order that the character and appearance of the listed building/s and conservation area are not adversely affected.



Rottingdean Conservation Area Character Statement

The council has adopted character statements for a number of its conservation areas, including the Rottingdean Conservation Area. The character statement sets out the historic development of Rottingdean and identifies four different character areas. The St Aubyns school site is within the **High Street character area**, which is centred on the commercial heart of the village. Developers will be expected to have regard to this character statement in putting forward development proposals for the area. The design should be sympathetic to the heritage context and should aim to preserve or enhance the character and appearance of the area. Particular attention should be paid to opportunities to enhance the setting of listed buildings and the conservation area. The westerly vista from Newlands Road across the St Aubyns playing fields is identified as an 'Important View' in this document.



English Heritage

English Heritage has produced an online guide to Heritage Protection which provides a summary of the law, policy and guidance that exists to protect historic areas, sites, buildings and monuments in England. The advice concerning Listed Buildings and

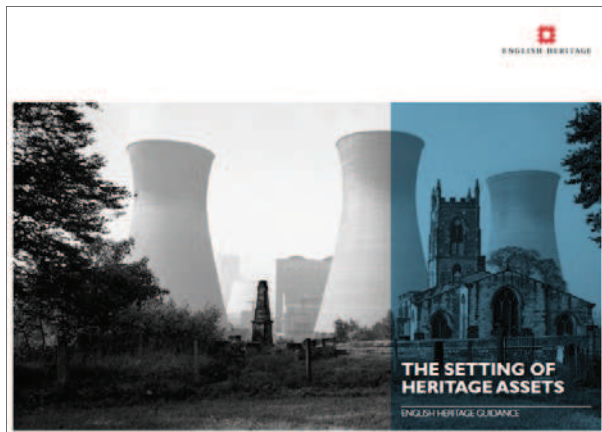
Conservation Areas is of particular relevance to the St Aubyns site and forms an important part of the planning framework for bringing forward a future redevelopment of the site.

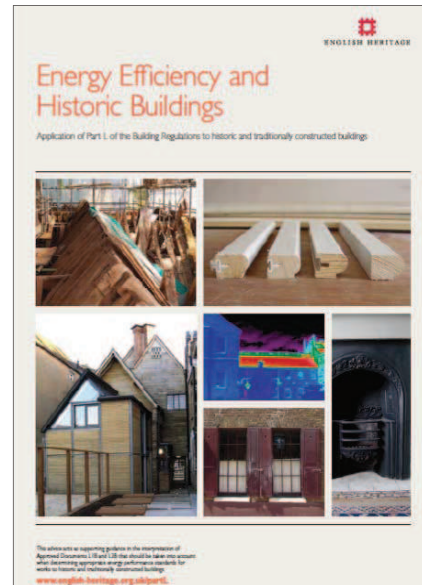
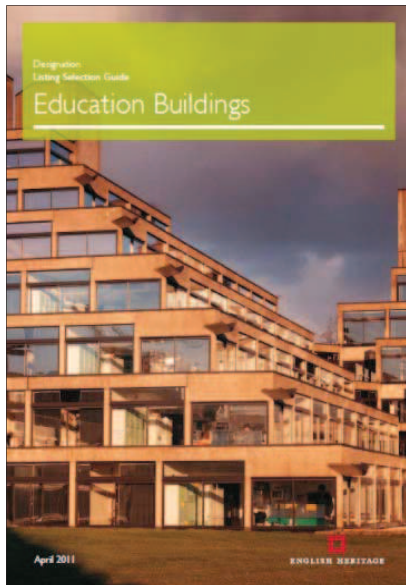
In assessing the significance of heritage assets Conservation Principles (2008) usefully applies a values based approach.

The Setting of Heritage Assets (2011) defines setting as ‘the way in which an asset is experienced’. Therefore setting is defined not only in terms of intervisibility of assets and new developments, but also on how it impacts on the significance of an asset, understanding of its historic development, or the function of historic places’ .

It has produced a number of publications which provide detailed guidance and case studies concerning both historic school buildings and how to manage vacant historic buildings for temporary and permanent re-use. English Heritage also provides technical and practical guidance on improving the energy efficiency of historic buildings.

Developers are advised to familiarise themselves with this guidance in advance of putting together development proposals for the St Aubyns site.





Given that the site lies within a conservation area and includes listed and curtilage listed buildings; developers will need to engage with the council's Heritage team at the earliest opportunity i.e. during the pre-application stage. English Heritage will also be a statutory consultee in any future planning application associated with the site. Its comments on development proposals, as well as the views of the council's Heritage Team, will be afforded significant weight during the determination period.

Sport England

Sport England is a statutory consultee for any development proposals which affect playing fields and the organisation has stated support in the approach of this planning brief in its intention to preserve or enhance the existing open space for public use and to encourage public use of the existing open space for outdoor recreation in order to secure improvement in the health and social well-being of the local community. Sport England considers proposals affecting playing fields in the light of its Playing Fields Policy 'A Sporting Future for the Playing Fields of England' as well as the NPPF 2012, in particular paragraph 74.

The aim of the Sport England Playing Field Policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demands of the pitch sports. The policy identifies five exceptions to Sport England's normal position of opposing development which would result in the loss of playing fields, as follows:

Sport England Policy	
Summary of Exceptions	
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
E2	The Development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
E3	The Development only affects land incapable of forming part of a playing pitch and the would lead to no loss of ability to use/size of playing pitch
E4	Playing field lost would be replaced, equivalent or better in terms of quantity, quality and accessibility
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

Legal Agreements to secure future community access to the playing field would include a community use agreement or other legal agreement such as S106 agreement. This will set out how it is intended to operate, covering such matters as hours of availability, management arrangements, pricing policy etc. Further information regarding community use agreements is provided on Sport England's website:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/>

Any new facilities should be built in accordance with Sport England's technical guidance notes, copies of which can be found at:

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

With regard to estimating the future maintenance costs Sport England website provides 'Life cycle costs' which advises how much it costs to keep a natural turf pitch/artificial surface fit for purpose during its lifetime. This information may be of assistance to prospective developers:

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/cost-guidance/>

The cost of maintaining the existing open space including tennis courts has previously been estimated by the city council's Parks Team. The options available for the council to take out a 25 year lease on the land with an appropriate provision of funding for maintaining the open space could be explored.

One Planet principles

Brighton & Hove is a designated One Planet City. The One Planet approach aims to create a future where it's easy, attractive and affordable for all of us to lead happy and healthy lives, using a fair share of the earth's resources. The principles are summarised below.

Zero carbon

Making buildings more energy efficient and delivering all energy with renewable technologies

Zero waste

Reducing waste arisings, reusing where possible, and ultimately sending zero waste to landfill

Sustainable transport

Encouraging low carbon modes of transport to reduce emissions, reducing the need to travel

Sustainable materials

Using sustainable products that have a low embodied energy

Local and sustainable food

Choosing low impact, local, seasonal and organic diets and reducing food waste

Sustainable water

Using water more efficiently in buildings and in the products we buy; tackling local flooding and water course pollution

Land use and wildlife

Protecting and expanding old habitats and creating new space for wildlife

Culture and community

Reviving local identity and wisdom; support for, and participation in, the arts

Equity and local economy

Inclusive, empowering workplaces with equitable pay; support for local communities and fair trade

Health and happiness

Encouraging active, sociable, meaningful lives to promote good health and well being

Appendix 2 – Historic development of St Aubyns school

Dr Thomas Redman Hooker established a school at Rottingdean vicarage (now The Grange, The Green), during his tenure as vicar between 1792 and 1838. Expansion of the school led to the use of 76 High Street as an annex. Built in the early 19th century, 76 High Street was originally a residence. It was in use as a school by 1832, when it was named Kennedy's School. In 1863 it was known as Field House School, when a Mr Hewitt was headmaster. The school was later operated by brothers Henry and George Mason. They re-named the school Rottingdean School in 1887, and seven years later they moved that school to new premises to the north of the site.

In 1895, Mr C.E.F. Stanford and Mr R.C. Vaughan Lang brought five boys from Kingsgate House, Winchester, to establish a new school in the building. This was called St Aubyn's Preparatory School for boys. By 1905, there were over 60 pupils, and by 1919 (the year Mr Stanford retired) this had risen to over 100. This rise in pupil numbers is reflected in a number of new buildings constructed on the site in the early 20th century. These included a sports pavilion on the playing field. The chapel was constructed in 1913, and following the war, memorials to those former pupils who gave their lives in the war were erected within it. A further War memorial was also constructed in the playing field. During this period (from 1907 to 1911), John Kipling, the son of Rudyard Kipling, attended the school. He is commemorated in the chapel.

Vaughan Lang retired in 1940, at which point Mr W. H. Gervis took over. Gervis oversaw the school's evacuation to North Wales during the war, at which point the apostrophe in St Aubyn's was dropped.

In 1970, the school became a Charitable Educational Trust. Expansion and improvements continued in the following decades under the leadership of J.A.L James (headmaster 1974-1998), Mr A.G. Gobat (headmaster 1998–2007) and Mr S.L. Hitchings (headmaster 2007–2013). This included:

- 1976 swimming pool
- 1978 kitchens
- 1980 art school
- 1982 sports complex of gym, squash court and changing rooms
- 1989 classrooms around courtyard
- 1999 80 seat performing arts studio
- 2000 ICT room
- 2001 library
- 2009 hard court for netball and tennis

Appendix 3 – Heritage guidance for listed/ curtilage listed buildings

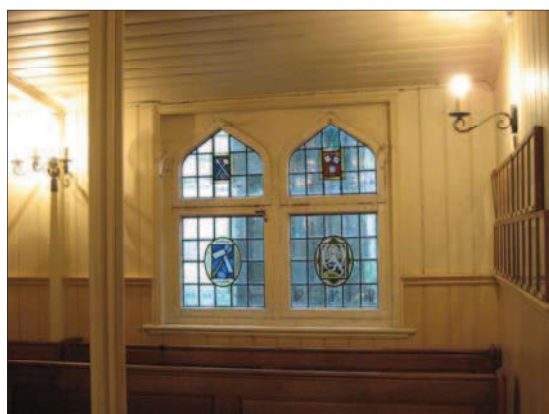
In line with paragraph 128 of the NPPF, any development proposal should be based on a full and in depth Built Heritage Assessment . The following comments are made based on an initial assessment and historic research and do not prejudice the findings of a later Built Heritage Assessment.

Main school building, its extensions and Chapel

The significance of the main building lies in the architecture of its front elevation, the plan form and features that survive to the interior. These reveal much about the building's changing use and status over time. The various extensions of the building are a historic record of the development of the school and of education more generally. It also has historical value in illustrating that this design of house was built for a family of wealth and for explaining the lives and fortunes of the people who occupied this school.

In recognition of the building's Grade II listed status, all historic fabric and architectural features should be retained and repaired. This includes any surviving internal features, such as doors, windows, skirting boards, cornices and fireplaces. Room proportions should be maintained. Any windows which have been replaced with unsympathetic modern alternatives should be reinstated as timber hung sash windows. Similarly, opportunities should be taken to better reveal the significance of the listed building wherever possible.

The most appropriate use of the building would be one in which it remains in single use. If subdivision is considered acceptable, this should be undertaken sensitively and with consideration of the original/ historic floor plan and circulation routes. Steps should be taken to ensure these remain legible (or indeed that their legibility is enhanced).





Examples of original architectural features which should be retained and restored

The area to the north of the main building comprises a number of additions and extensions. The significance of these needs to be identified through the Built Heritage Assessment.

The Chapel is considered to be of particular architectural and historic interest. This is due to the rarity of surviving early 20th century school chapel of this style, its association with children, the school (children who attended the school are depicted in the stained glass for example) and with Rottingdean village. Its use as a chapel of remembrance is of particular sensitivity. It is of additional historic interest due to its connection with John Kipling, son of author Rudyard Kipling. This significance should be identified and better revealed through the Built Heritage Assessment. The building should be retained in its current location, including its fixtures and fittings to the interior.



The Grade II listed Chapel



Commemoration of soldiers in the Chapel

The school campus site

The site as a whole is subdivided into a number of discrete areas by virtue of the flint walls and the position of buildings. This 'courtyard' character should be preserved and enhanced.

The proportion of open space/ density of building on the site should preferably be retained at its current level as this would be in keeping with the setting of the listed building and character of the conservation area.

If further density is considered necessary to secure a viable scheme, this should be sensitively located and designed to not have a harmful impact on the setting of the listed building and character of the conservation area.

The areas to the immediate front and rear of the main building should not be developed. The land beyond the croquet lawn is also particularly sensitive to the setting of the listed building. This is because of the rising terracing of this part of the site which would make development in this area highly visible from the listed building. Any development would therefore need to be sensitively designed, of an appropriate scale and height, and set back from the terracing. The trees and landscaping in this area should be retained and enhanced.

Curtilage listed buildings on the school site

The courtyard cottages are curtilage listed and should be retained. The exterior of these buildings retains much historic integrity. This should be retained and enhanced where possible. The interior of the courtyard cottages has been more substantially altered, and presents greater flexibility for alteration.

The shooting range appears to date to the early 20th century, and is an interesting survival. Its significance should be identified within the built heritage assessment. **Later structures on the site**

Late 20th century buildings on the site are not of any particular historic or architectural interest. Their demolition would not be resisted, provided the demolition formed part of an acceptable redevelopment of the site.

The buildings behind the flint and brick wall to Steyning Road have been sensitively designed such that only the roof is visible in the streetscape, and that roof appropriately steps up to follow the contours of the hill. Although the buildings themselves are of no particular historic or architectural interest, their design is appropriate for their location. Any replacement building would need to be particularly sensitively designed.

Playing field

The playing field is an important part of the setting of the conservation area. It provides an important reminder of the once rural setting of the village, and a distinction between the

historic village and surrounding suburban development. The war memorial, sports pavilion and drinking fountain are important features on the playing fields, which identify the intended use of the space. They are all considered curtilage listed. It would be appropriate for them to be retained and repaired.

Listed buildings outside the development site

There are a number of listed buildings located outside the school site but in close proximity to it. The impact on the setting of these listed buildings should be considered in any future proposals for the site. These include 33, 39, 41, 43-49, 62, 65 (The Black Horse Public House) and 66 High Street.

