

St Aubyns School Site Draft Planning Brief Consultation Report

January 2015



City Planning

Brighton & Hove City Council

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1. Summary

The St Aubyns Planning Brief has been prepared to provide development principles to guide the redevelopment of the former St Aubyns school site in Rottingdean. The draft St Aubyns Planning Brief was approved for a public consultation exercise by a meeting of the Economic Development and Culture Committee on 19 June 2014.

A public consultation exercise was undertaken between 8 Sept and 17 Oct 2014 and included a week-long public exhibition. This report sets out the issues and themes raised within the public consultation responses; how these have been considered and where changes have been made in the final brief in response to these issues.

2. Background

The Brief was prepared in response to a request by Rottingdean Parish Council to set out planning guidance for the former St Aubyns School site. It was agreed that a planning brief would be prepared to facilitate a high quality and sustainable redevelopment of this site, lying in the centre of Rottingdean village, which respects the character of the heritage assets and the recreational opportunities arising from the existing open space.

Planning briefs are recognised as useful tools for improving the quality and the consistency of advice provided to developers, as well as enhancing the efficiency of the planning process and the quality of the built environment.

3. Consultation methodology

Public consultation was undertaken during the period 8 September 2014 to 17 October 2014, primarily using the council's online consultation portal which displayed the draft St Aubyns Planning Brief as well as images of the public exhibition panels.

Within this period a public exhibition was held at Rottingdean Library in The Grange, a venue local to the St Aubyns site, between 29 September and 4 October 2014 (inclusive) and was staffed between 29 and 30 September 2014.

Public notices to advertise both the Exhibition and the consultation portal details were displayed around the site prior to the exhibition. Letters were sent to all Rottingdean residents; other interested parties, statutory consultees and stakeholders were individually e-mailed, with details of the consultation portal address, drop-in public exhibition, and the planning projects e-mail address.

Following a council press release there was a short article in the Argus on 16 June 2014 publicising the public consultation to be held in September.

The consultation gave an open opportunity to make any comments or observations about the St Aubyns School Site draft planning brief. Further to this two questions were posed:

1 - 'What is your preferred use of the Grade II listed St Aubyns school chapel in a future development of the site?'

2 – 'What open space/ outdoor recreation would you like to see provided in a future development of the site?'

4. Responses received

207 responses were received from the public and groups such as Friends of St Aubyns, the Round Hill Society; Play Area in Rottingdean Committee (PARC); Rottingdean Preservation Society; The Regency Society; Rottingdean Cricket Club and Rottingdean Football Club during the consultation exercise (see Fig 1). Of these 77% of responses were submitted online through the council's consultation portal, and 20% were submitted via the comments box on forms provided at the public exhibition. 3% were received via email/letter.

Stakeholders

Furthermore, responses were also received from the following stakeholder groups or their representatives:

The Landowner
English Heritage
Sport England
Highways Agency
Conservation Advisory Group

Rottingdean Parish Council are partners in the production of the St Aubyns Planning Brief.

5. Results and findings

Question 1

‘What is your preferred use of the Grade II listed St Aubyns school chapel in a future development of the site?’

178 responses were received in response to question 1

70% (124) of all responses suggested as their preferred use a continued chapel/community use/ museum / war museum /Art Gallery

Included in the above figure are responses for a continuation of the chapel use and/or community use (54% aggregated) and responses for a Museum/ war museum and/or Art Gallery (41% aggregated)

Other Suggestions

Educational use	25%
Retain/incorporate into a new development	19%
Permanent war memorial	17%
Art Gallery/museum	15%
Include within a wider residential use	10%
Hotel/Spa Restaurant	8%
Possibility of moving chapel off site	2%

Question 2

'What open space / outdoor recreation would you like to see provided in a future development of the site?'

192 responses were received in response to question 2

73% (139) of all responses suggested they would like to see a public use of the open space

Other Suggestions

General sporting use/ recreation ground	37%
Community leisure / public park & open space	35%
Include public facilities e.g. tennis/cricket/ outdoor gym	28%
Facilities for children and young people	28%
School sporting use	14%
Provision of some car parking	3%
Farm / allotment	2%
No more open space required	1%
Redevelop for housing	0.5%

Question 3

‘Please use the space below if you have any other comments or observations you would like to make about the St. Aubyns School Site draft planning brief’

164 responses were received in response to question 3

31% (50) of all responses commented that the existing traffic infrastructure is insufficient to meet the needs of new residential development

Other themes arising

Concerns regarding overdevelopment with regard to existing infrastructure provision (e.g. schools, G.P. provision)	26%
Site should retain school use or other C2 use	22%
Focus on community uses	21%
Support the protection of heritage assets	20%
Existing traffic problems at Steyning road	13%
Existing traffic problems on Rottingdean High Street	12%
Support for residential use on the site	11%
AQMA/air quality to be included in brief	7%
Support for hotel use on the site	5%
Disagree with parking &/or access point at Marine Drive	4%
Support sustainable building design	4%
Development to support employment /tourism opportunities	3%
Agree with suggested road access	3%
Parking needs from new development to be met on site	2%
Preferred access / development at Newlands Road	2%
Disagree with access from St Aubyns Mead	2%

6. Council's responses to the public consultation exercise

The council's responses to the issues raised as a result of the public consultation exercise carried out between September and October 2014 are detailed in table 1 (below). The table outlines the issues and themes raised through the consultation process and where either an amendment will be made as a result of consultation responses or no change is proposed.

Table 1 - The council's response to issues raised during the public consultation exercise for the St Aubyns Draft Planning Brief 8 September – 17 October 2014

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Public comments or observations made about the St. Aubyns School Site draft planning brief			
The existing traffic infrastructure is insufficient to meet the needs of new residential development	31% of the responses identified issues with the ability of the existing traffic infrastructure to cope with new residential development.	The brief will be expanded and amended under chapter 14 with extra paragraphs added with regard to the requirement for a Transport Assessment and comments from the Highways Agency with regard to the Strategic Road Network will be added to the text.	Amend chapter 14 and it's title to 'Transport, access and parking' to reflect the concerns that have been highlighted by the public consultation exercise
Concerns regarding overdevelopment with regard to the existing infrastructure provision (e.g. schools, G.P. provision)	26% of the responses voiced concerns regarding ability of the existing infrastructure (e.g. schools, G.P. provision) to cope with an influx of	The wording of the brief will be amended under chapter 15 to make clear that the council has a structured approach to the seeking of developer contributions for the infrastructure that may be required to meet the needs of new residents of a development scheme. Clear reference is given to the council's Developer Contributions Technical	Amend wording of chapter 15 'Community infrastructure and planning obligations'

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
<p>Site should retain school use or other C2 use</p>	<p>new residents 22% of the responses considered that the site should remain as a school or within its existing use category C2(Residential Institution)</p>	<p>Guidance 2011. The brief does not exclude the reuse of the site for a boarding school and along with this states that the use of the site by a day school '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 <i>and the playing field</i>'.</p>	<p>Amended chapter 10 'Land uses' under section Non-residential education and training centres to include the playing field. This is because a school use would also be expected to use the existing playing field</p>
<p>Focus on uses that would benefit the community</p>	<p>21% of the responses supported opportunities for the site to be developed in some way that may benefit the community for example from the open space and use of existing facilities such as tennis courts, or through an educational use</p>	<p>The brief promotes the community use of the open space and has one of its four objectives 'Maximise the use of the existing playing fields for open space and public recreation'. The brief states sympathetic views for planning application for educational facilities.</p>	<p>No change, as the responses are considered to support the approach of the planning brief.</p>
<p>Support the protection of heritage assets</p>	<p>20% of the responses supported the protection of the heritage assets</p>	<p>The brief promotes the protection of the heritage assets on and around the site, and has as one of its four objectives 'Preserve the listed buildings and preserve and enhance the character and</p>	<p>No change, as the responses are considered to support the approach of the</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Existing traffic problems at Steyning road	13% of the responses highlighted the existing traffic problems at Steyning Road which abuts the southern boundary of the site.	appearance of the Rottingdean Conservation Area and their respective settings' A Transport Assessment is now required under chapter 14 'Transport, access and parking' to review transport issues and options	planning brief. Amend chapter 14 'Transport, access and parking'
Existing traffic problems on Rottingdean High Street	12% of the responses	A Transport Assessment is now required under chapter 14 'Transport, access and parking' to review transport issues and options	Amend chapter 14 'Transport, access and parking'
Support for residential use on the site	11% of the responses	The brief acknowledges the principle of residential use of this site within a scheme that acknowledges and respects the significance of assets (heritage and open space) in and around the site	No Change, as the responses are considered to support the options within the planning brief.
AQMA/air quality to be included in brief	7% of the responses	A new paragraph has been added regarding the presence of the existing Air Quality Management Area and includes that new development proposals should be consistent with the council's Air Quality Action Plan. The Transport Assessment should especially consider the AQMA	Amend by adding a new paragraph 'Air Quality' in chapter 14 'Transport, access and parking' and include AQMA within Transport Assessment
Support for hotel use on the site	5% of the responses	The planning brief states that both a hotel use or a Health Centre/Spa would be acceptable 'in principle' uses within chapter 10	No Change

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Disagree with parking and/or access point at Marine Drive	4% of the responses	The wording has been refocused in response to transport concerns and public responses to the public consultation regarding an access point from Marine Drive. The text now clarifies that there is a presumption against the creation of an access point at Marine Drive, although there may be scope to explore the provision of an emergency access ingress point only. The consultation draft text took the same overall approach.	Amend the 'Marine Drive' paragraph in chapter 14 'Transport, access and parking' for the avoidance of doubt regarding the sensitivity of Marine Drive in relation to a potential access point
Support sustainable building design	4% of the responses	Support for chapter 12 is welcomed	No Change
Development to support employment /tourism opportunities	3% of the responses	The planning brief includes as an 'in principle' use 'Employment uses other than Class B1 offices which do not exacerbate transport problems' and does not preclude opportunities for tourism	No Change
Agree with suggested road access	3% of the responses	Support for the approach to road access in the planning brief is welcomed	No Change
Parking needs from new development to be met on site	2% of the responses	The planning brief now states that 'information on parking strategies for individual development proposals should be included within their Transport Assessment' and any expectations regarding parking levels have been removed to allow for the proper assessment of parking needs within an overall comprehensive Transport Assessment	Amend chapter 14 'Transport, access and parking' under Parking

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Preferred access / development at Newlands Road	2% of the responses	A Transport Assessment is now required under chapter 14 'Transport, access and parking' to review transport issues and options	Amend chapter 14 'Transport, access and parking'
Disagree with access from St Aubyns Mead	2% of the responses	A Transport Assessment is now required under chapter 14 'Transport, access and parking' to review transport issues and options	Amend chapter 14 'Transport, access and parking'
Rottingdean Cricket Club have identified their previous use of the St Aubyns playing field	The brief will be updated to reflect their information	There is no general public access to this field, although a number of local sports clubs have <i>up until recently</i> used the playing fields on an appointment basis. These include <i>Rottingdean Cricket Club</i> who used the cricket field for their third team matches <i>and junior matches</i> during the season and the <i>Sussex Bowmen</i> (a local archery club) who used the playing fields on occasional Sundays.	Amend by updating text in chapter 6 'Development Area' under <i>Playing Field</i>
Rottingdean Cricket Club (as above)	The brief will be updated to reflect their information	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 <i>clubs such as the Rottingdean Cricket Club</i> were allowed to use it with prior agreement from the owners	Amend by updating text in chapter 13 'Open space and ecology' under <i>Playing field</i>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Where changes have been made to the draft planning brief from comments and observations made by Stakeholders			
Landowner comments (via representatives)	Changes made to better reflect NPPF and local planning policy in line with landowner comments	Amend the third objective within Part One to read: 'Preserve the listed buildings and preserve and enhance the character and appearance of the Rottingdean Conservation Area and their respective settings'	Amend Part 1 'Introduction'
Landowner comments (via representatives)	Landowners representatives have requested that the initial process was 'in consultation with' Cothill Education Trust'	It is considered that the approach taken in the initial preparation of the planning brief was at the very least an active engagement process rather than a passive consultative process. The text has therefore been changed to describe the process as an engagement 'This document has been prepared by Brighton & Hove City Council (the local planning authority) in partnership with Rottingdean Parish Council (the Parish Council) and <i>with the engagement of the Cothill Educational Trust (the current owners of the site).</i> '	Amend chapter 3 'Background'
Landowner comments (via representatives)	Changes made to better reflect the relevant Planning Act in line with landowner comments	Remove ' <i>or enhance</i> ' from the text 'The need to preserve the setting of the listed building'	Amend chapter 9 'Site constraints and opportunities'

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Landowner comments (via representatives)	Add 'in principle' to reflect landowners comments	Include italicised text: 'The need to retain <i>in principle</i> the listed/ curtilage listed buildings identified in Fig 2 as well as other key features of the site'	Amend chapter 9 'Site constraints and opportunities'
Landowner comments (via representatives)	Add text to clarify appendix 2	Include italicised text: 'The Grade II listed main building (including chapel), listed boundary wall and the curtilage listed buildings <i>should in principle</i> 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, <i>based on the findings of the built heritage assessment</i> '	Amend Appendix 2
Landowner comments (via representatives)	Clarification requested	Include text '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.'	Amend Appendix 3
Sport England	Update to reflect the comments made by Sport England	Add the italicised text: 'Sport England is a statutory consultee for any development proposals which affect playing fields. Early engagement with Sport England is <i>recommended, and the advice they have provided on the specific matters raised by this planning brief is contained within Appendix1.</i> '	Amend chapter 6 'Development area'

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
Sport England	To reflect more clearly that all new development should meet its own requirements for sports facilities relating to Sport England comments, and to identify the opportunities to provide this on site.	Amend the following point to make it more succinct: 'The potential to bring forward open space for sport and recreation use for members of the public' Include a new bullet point in relation to comments: 'The opportunity to meet any new sports facility needs on site from additional residential units created as part of any redevelopment proposal'	Amend chapter 9 'Site Constraints and opportunities'
Sport England	Add reference to NPPF paragraph 74 subsequent to Sport England comments	Include as new text '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'.	Amend chapter 10 'Land uses' under Ensuring viability and deliverability
Sport England	New text to reflect Sport England comments	Include as new text ' <i>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, Sport England and planning policy will seek to ensure that any proposals which seek residential development at St Aubyns will meet any resulting new sports facility needs arising from the scheme.</i> '	Amend chapter 13 'Open space and ecology' under Playing field

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
<p>Sport England</p>	<p>New text to reflect Sport England comments</p>	<p>Include italicised text within existing text: <i>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</i></p>	<p>Amend chapter 13 'Open space and ecology' under Playing field</p>
<p>Sports England</p>	<p>Amend existing text to reflect Sport England comments</p>	<p>Replace previous text with italicised text '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</p>	<p>Amended text inserted into beginning of Appendix 1</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable														
		<p><i>Sporting Future for the Playing Fields of England' as well as the NPPF 2012, in particular paragraph 74.</i></p>															
Sport England	Inclusion of table in Appendix 1 as recommended by Sport England	<table border="1"> <thead> <tr> <th data-bbox="485 1128 564 1189"></th> <th data-bbox="485 488 564 1128">Sport England Policy</th> </tr> <tr> <th data-bbox="564 1128 644 1189"></th> <th data-bbox="564 488 644 1128">Summary of Exceptions</th> </tr> </thead> <tbody> <tr> <td data-bbox="644 1128 724 1189">E1</td> <td data-bbox="644 488 724 1128">An assessment has demonstrated that there is an excess of playing fields in</td> </tr> <tr> <td data-bbox="724 1128 804 1189">E2</td> <td data-bbox="724 488 804 1128">The Development is ancillary to the principal use of the playing field and does</td> </tr> <tr> <td data-bbox="804 1128 884 1189">E3</td> <td data-bbox="804 488 884 1128">The Development only affects land incapable of forming part of a playing</td> </tr> <tr> <td data-bbox="884 1128 963 1189">E4</td> <td data-bbox="884 488 963 1128">Playing field lost would be replaced, equivalent or better in terms of quantity,</td> </tr> <tr> <td data-bbox="963 1128 1043 1189">E5</td> <td data-bbox="963 488 1043 1128">The proposed development is for an indoor/outdoor sports facility of sufficient</td> </tr> </tbody> </table>		Sport England Policy		Summary of Exceptions	E1	An assessment has demonstrated that there is an excess of playing fields in	E2	The Development is ancillary to the principal use of the playing field and does	E3	The Development only affects land incapable of forming part of a playing	E4	Playing field lost would be replaced, equivalent or better in terms of quantity,	E5	The proposed development is for an indoor/outdoor sports facility of sufficient	Amend by inserting Table into Appendix 1
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	Summary of Exceptions																
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E4	Playing field lost would be replaced, equivalent or better in terms of quantity,																
E5	The proposed development is for an indoor/outdoor sports facility of sufficient																
Sport England	New Text Inserted into Appendix 1 to reflect comments by Sport England	<p>Include italicised text within Appendix 1 '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:</p>	Amend by inserting new text into Appendix 1														

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
		<p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/</p> <p><i>Any new facilities should be built in accordance with Sport England's technical guidance notes, copies of which can be found at:</i></p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p><i>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:</i></p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/cost-guidance/</p>	
Original text: 'The cost of maintaining the existing open space including its tennis	This text has been amended further to Sport England	The cost of maintaining the existing open space including tennis courts has previously been estimated by the city council's Parks Team. <i>The</i>	Updated text has been taken out of section 13 and

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
<p>courts has been estimated by the city council's Parks Team. In principle, the council would be agreeable to taking out a 25 year lease on the land, providing the funding for maintaining the open space could be secured.'</p>	<p>comments and put in Appendix 1 within the paragraph discussing Legal agreements and the playing field. This is also to future proof the brief as the services that can be offered by the City Council may be subject to change</p>	<p><i>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.</i></p>	<p>included in Appendix 1 within a wider discussion concerning legal agreements in relation to the playing field.</p>
<p>Sport England</p>	<p>Referral to the Sport England Sports Facilities Calculator</p>	<p>For information - The City Council has its own adopted SPGBH9 – A Guide for Residential Developers on the Provision of Open Space (and the 2011 Update)</p>	<p>No Change</p>
<p>Highways Agency</p>	<p>Update the brief by including Highways Agency comments for further guidance</p>	<p>Include a new paragraph further to the comments by the Highways Agency: '<u>Strategic Road Network</u> <i>The Highways Agency on behalf of the Secretary of State for Transport is responsible for managing and operating a safe and efficient Strategic Road Network (SRN). 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</i></p>	<p>Amend by inserting new text into chapter 14 'Transport access and parking'</p>

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
English Heritage	To reflect comments made by English Heritage	<p>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 the prospective developer 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.'</p>	
		<p>Include new italicised text '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. <i>It should remain deferential to the main listed building.</i>'</p>	Amend chapter 8 'Heritage considerations' by including new text under Built heritage assessment

Issue identified	Comment	Commentary/ Action	Amend/ No change/ Not Applicable
English Heritage	To reflect comments made by English Heritage	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' .	Amend Appendix 1 by including text under English Heritage
English Heritage	To reflect comments made by English Heritage	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.	Amend by adding text to Appendix 3
County Archaeologist	Add text to make developers aware of potential archaeological requirements	Include new italicised text '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 <i>and be aware that there may be a requirement for archaeological fieldwork to better understand the site prior to a planning decision being made.</i> '	Amend by adding text to chapter 8 'Heritage considerations'

