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Mr R Bewick  
Planning Department  
Wealden District Council  
Vicarage Lane  
Hailsham  
BN27 2AX

13 January 2023

Dear Mr Bewick,

**Re: Ashdown House School, Forest Row, East Sussex, East Sussex, RH18 5JY.**

I have been appointed by the Latrobe Heritage Trust to review the submitted proposals for the Ashdown House School site and I wish to formally **object** to Planning Application **WD/2022/2372/MAJ** and Listed Building Consent Application **WD/2022/2373/LB** which seek a change of use for the site and the redevelopment of the Listed main house and gardens into residential units on the following heritage grounds:

The Local Authority has a duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses (Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990) (thereafter referred to as The Act).

In this instance, the Grade II\* Listed Ashdown House and Grade II Archway fall within the application site.

The requirements of the Act are reinforced by the National Planning Policy Framework (NPPF), which at Chapter 16, sets the national agenda for 'Conserving and enhancing the historic environment'. This requires the significance of any heritage asset to be identified and assessed that may be affected by a proposal (including by development affecting the setting of a heritage asset) and for this to inform future change in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Paragraph 200 of the NPPF states that any harm to the significance of a designated heritage assets should require clear and convincing justification, with substantial harm or loss of a Grade II\* buildings being wholly exceptional. The same paragraph also states that the significance of a designated heritage asset can be harmed or lost through development within its setting. Paragraph 189 of the NPPF states that planning should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations. Paragraph 198 outlines the requirement for local planning authorities to have regard to the importance of retaining in situ any historic statue, plaque, memorial or monument when considering any application to remove or alter them. The NPPF requires at Paragraph 194 that applicants provide a description of the significance of any heritage assets affected by proposals within their submission, and that the level of detail should be proportionate to the assets' importance.

It should be noted that the Courts have held that 'preserve' means an absence of harm. The NPPF points out that harm can be either 'substantial' or 'less than substantial' and where harm occurs, it should be given considerable weight as a material consideration in the assessment of planning applications and as part of the balance exercise and in ascertaining if any public benefits would outweigh that harm. This national policy intent is also addressed



by Wealden District Council in adopted local planning policies such as Local Plan Policies EN1 and EN27; Core Strategy Policy SP02; as well as Chapter 12 of the Wealden Design Guide. Harm is further defined in paragraph 84 of Historic England's *Conservation Principles* as 'change which erodes the significance of a heritage asset'.

The significance of a heritage assets such as Ashdown House and the Archway is defined by the NPPF as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest.

The Latrobe front range of the main house (1794) is of clear architectural (as well as artistic and historic) interest and retains an intact plan form as well as its original principal and secondary staircases. It is arguably the best preserved of Latrobe's buildings and interior schemes in the world, with a very good survival of high-quality artistic detailing such as the original cornices and decorative ceiling plasterwork, skirting boards, architraves, chimney pieces, timber floorboards, doors, glazing, and internal joinery. Latrobe adopted and installed innovative designs and materials at Ashdown, such as the use of Coase Stone and the central semi-circular portico on the front range, which served as the prototype for the portico Latrobe later designed for the White House in Washington, USA. Additionally, the inclusion and survival of high-status rooms and features such as the domes on the second floor, which is a highly unusual for this period, contribute to the architectural individuality of Ashdown House. The building is a globally unique example of Greek Revival architecture, noted by Pevsner to be "*very perfect indeed*", and is therefore a building of high architectural and artistic interest and significance.

In terms of historic interest, Ashdown House and the Archway were designed and built by Benjamin Henry Latrobe. Completed in July 1795, this was his second independent work in Britain and the last before he emigrated to America, where he later designed the US Capitol building and the White House in Washington and became known as 'America's first architect'. In addition, the layered history of the site makes it an exceptionally significant heritage asset in terms of historic interest. A house has been on the site since the early medieval period and, to the rear of the Latrobe designed front range, is a mediaeval hall house, which records show was extant by 1597 and was retained by Latrobe during the reconfiguration of the site as a service wing. The 19th century rear service wing is known to contain a high amount historic surface fabric and the character of the space survives. The Chapel, built in c.1930 as a war memorial by Norman Evill (1873–1958) who worked extensively under Edmund Lutyens, was commissioned by his cousin Arthur Evill, headmaster and owner of Ashdown (1910–39), in memory of Arthur's son(s) and Old Ashdownian pupils killed in the First World War. The Chapel, which retains its original Arts & Crafts interior scheme and furnishings, also contains memorials to pupils of the school killed in subsequent conflicts. Norman Evill also designed and oversaw the construction of, in conjunction with Aidan Wallis, a new wing adjoining the principal building to the east in c.1930. There are various unlisted houses, cottages and ancillary buildings on the site which were designed by Edward Hill and Chris Mitchell in the latter half of the 20th century.

The site has a high level of archaeological and evidential interest. A findspot of Palaeolithic (the palaeolithic period being the earliest period of known human culture) material is recorded on the application site, which evidences the archaeological interest and value of Ashdown House and it's setting. Roman activity is well recorded in the local vicinity and the Ashdown estate, formerly known as 'Lavertye', has existed since the 13th century. Indeed, there is a high potential for archaeological remains to be identified within the site. The Archaeological Desk Based Assessment included in the application submissions identifies that there are highly likely to be below-ground archaeological remains surviving within the site, which could include archaeological remains from the Prehistoric, Roman and Medieval periods. The archaeological potential for further assets of post Medieval/Modern date is high within the remains associated with the Grade II\* listed Ashdown House, a building of international importance.



Considering the key significant values of the designated heritage assets on the site, broadly outlined above, I consider the following aspects of the development proposals to be substantially harmful to the significance of Ashdown House and the Archway and their curtilage:

- The proposed subdivision of the main house into 9 separate residential units is not an appropriate or sympathetic approach and will result in the loss of significant historic fabric. The proposals will result in the loss of the legibility of the intact plan form of the Latrobe front range and therefore represent significant harm to the heritage assets on the site.
- The loss of original walls to facilitate the provision of facilities such as home gyms and cinemas is not substantiated within the proposal documentations and is unreasonable to undertake such alterations to a particularly important building of more than special interest. Indeed, the proposed ‘new build’ extension at high level to the rear of the Latrobe wing of the main house to enable the construction of a 15½ft-wide private lift – wider even than the front portico – to the top-floor apartment is of a poorly considered design and proportion and would be a highly visible, inappropriate addition to the building. This extension would also result in lower light levels within the front range of the building as it would obscure a number of rear-facing windows serving the principal reception rooms.
- Despite noted maintenance issues within the report drafted by Hutton + Rostron appended to the applications and ongoing water ingress into the building which has resulted in the suspected failure of truss tie beam bearings below the east and west gutters of the Latrobe block roof and evident damage to internal plasterwork, no repair specification detailing the methodology and proposed materials to repair Ashdown House and Archway have been submitted as part of the proposals. The inadequate security on site in tandem with these ongoing defects and lack of maintenance to the buildings does not support the Heritage Impact Assessment’s statement that the owner wishes to conserve the buildings with the least requirement for change and physical alteration.
- Insufficient details related to the proposed works to Ashdown House have been submitted as part of the proposals; namely profiles and material details of the proposed new windows and doors, ironmongery, the rainwater goods which require extensive repair and upgrading of capacity, and details of the new cladding material proposed to be installed on the elevation H-H of the main building. Indeed, technically the thermal and acoustic performance of the existing windows of the main house will not meet the requirements of the proposed occupancy of the building, but their replacement to facilitate this upgrade cannot be justified in heritage terms.
- The proposals include the application of an intumescent paint to the original plaster ceilings of the Latrobe front range in order to provide a 60-minute firebreak to enable the subdivision of the house. The proposals also outline the removal of the original historic timber floorboards in order to insert fire-wool and fire-mesh into the floor cavities as additional firebreaks, the weight of which will further compromise the plaster ceilings below, and then applying an acoustic resilient flooring. These works will cause extensive damage to the original historic fabric and will have a significant harm to the significance and character of the building.
- Of the joinery details provided, these show modern profiles that are not suitable for installation on a heritage asset and do not conform to conservation design standards.



- The proposed insertion of services into the chimney voids will mean that they cannot be used for their original purpose and will cause long-term maintenance issues with these masonry structures. Insufficient details of the service plans and details of the development have been provided within the application.
- Subdividing the Grade II\* listed Ashdown House into separate ownership will be irreversible and cannot be justified within Local and National Planning Legislation. Furthermore, multiple ownership will make the longer-term maintenance and conservation of the building far more difficult and will put the building at further risk and does not represent a heritage benefit as the application suggests.
- The proposed insertion of large windows into the Latrobe designed rear service block would represent a significant loss of historic fabric and would detract from the aesthetic and historic value of this curtilage listed building.
- Converting the curtilage-listed Arts and Crafts Chapel to a residential use is unsubstantiated in heritage terms. Removing the original 1930s furniture and interior scheme and inserting partition walls will be irreversible, and the proposed removal of the dedication plaques to fallen past pupils in combat is a particularly distasteful aspect of the scheme and contravene National Planning Policy. In my opinion, the Heritage Impact Assessment does not fully explore the significance of the Chapel building as a war memorial and contribution to the architectural and historic values of Ashdown house and the Archway.
- The proposal to increase the size and height of the former Science Block, while removing the East Wing in front of it, risks serious detrimental effect to the heritage setting of the Ashdown House. This has been insufficiently considered within the submitted reports and plans because of its omission from most of the southerly elevations.
- The locations of several proposed new dwellings in the northern part of the site are proposed to be placed directly over previously demolished buildings. There is therefore a high potential for the physical impact of the proposed development to expose, damage and destroy unknown archaeological remains. The proposals therefore represent a risk and unsubstituted harm to the archaeological values of the heritage assets on the site, which contribute to their significance.
- The proposed construction of residential units in the north section of the site represents a major development which is unsuitable to be placed in such proximity to Ashdown House and the Archway, and indeed their curtilage and setting. The proposed development would have a noticeable and significant adverse impact on the significance of the heritage assets, by virtue of the urbanisation of their setting. The proposed development is high density and not of the local vernacular architectural style. Therefore, the proposed development would not preserve the elements of the setting of these designated assets that make a positive contribution to their significance. Furthermore, the historic legibility and significance of the Ashdown Estate as a historic rural mansion will be impacted. The historic vistas and views which also contribute to the architectural and historic significance values of Ashdown House and the Archway, would be irrevocably altered and harmed, as demonstrated in the application documentation.



- As the site is in private ownership, the proposals would produce no public benefits to outweigh the permanent harm that would occur.

To conclude, it is my opinion that the proposals represent a substantial scale of harm to Grade II\* listed Ashdown House and Grade II listed Archway on the site and should be refused Planning and Listed Building Consent. It is also important to note that Ashdown House is currently subject to a Listing Enhancement process by Historic England, which may result in its upgrade to Grade I Listed status.

I do not consider that adequate research has been undertaken to assess the impact of the proposals on the development. Indeed, The Archaeological Interpretative Survey submitted as part of the application explains that more detailed building recording and research will be required for the entire site to understand the full impact of the proposals and that the report was prepared only to support the application to pre-application stage. The report further notes that the authors were not able to access many parts of the building. The documentation provided does not sufficiently support nor justify the proposals which will have significantly harmful impact on assets of the highest significance.

I do not consider there to be heritage benefits that would outweigh the impact of the harm of the proposal to the significance of the heritage assets, contrary to of Saved Policies GD2, EN1 and EN27 of the Wealden Local Plan 1998; Spatial Planning Objectives SPO2 and SPO13, and Policy WCS14 of the Wealden Core Strategy Local Plan 2013; Chapter 12 of the Wealden Design Guide 2008; coupled with the requirements of paragraphs 126, 130, 134, 174, 176, 189, 190, 194-205 of the National Planning Policy Framework 2021.

Yours sincerely,

Sophie Drew BSc MSt (Cantab.) MSc IHBC  
Director  
Grove Limited