



CONSULTATION RESPONSE: OBJECT

Mr R Bewick
Wealden District Council
Council Offices
Vicarage Lane
Hailsham
East Sussex
BN27 2AX

By email to: planning@wealden.gov.uk

Our reference: 23003

16th January 2023

Dear Mr Bewick,

Planning Application WD/2022/2372/MAJ and WD/2022/2373/LB –Residential use and partial redevelopment of the former Ashdown House School, including (1) partial demolition of existing accretions, and extension, alteration and conversion of Ashdown House to residential use; (2) demolition and partial demolition, extension and replacement of detached free-standing buildings for residential use; (3) erection of dwelling houses; (4) retention, refurbishment and reorganisation of existing dwellings. Along with hard and soft landscaping and associated works.

SAVE Britain's Heritage objects to the above planning application which involves subdivision of this important grade II* listed house and extensive remodelling of its early 19th century rear extension. Key to the subdivision of the main house into two apartments is the insertion of a lift in an existing light well. The impact of this insertion on views of the house from east, west and north have been insufficiently illustrated. Conversion of the remaining parts of the listed building, including the 1930s Chapel, together with new buildings to the rear of the house constitute a considerable amount of development.

In addition, the listing of the house and its adjoining and curtilage buildings is significantly out of date. The house was originally listed in November 1953 and although apparently updated in 1982, has no description of the interior. As a result the important details of internal decoration and surviving fabric, so critical to a determination of the house's significance, are not fully reflected.

There is a lack of detail within the application documents regarding the actual interventions required to effect conversion of the main house, Tudor service wing and early 19th century extension which preclude accurate assessment of the extent of the work involved.

We consider the proposal to be detrimental to Ashdown House and the historic extensions to it. Accordingly, we consider that the proposals in their current form contravene both local and national policy for the protection of Wealden's historic environment. For these reasons we call on the Local Planning Authority to refuse planning permission.

Significance

Ashdown House is a grade II* listed house designed by Benjamin Henry Latrobe in 1794 as a residence. It is one of only two houses built by Latrobe in England, the other Hammerwood Park, being listed grade I. Latrobe left England for America in 1795 where he designed the Capitol Building in Washington DC as well as elements of

the White House and is regarded as a defining influence on the developing architectural style of the new nation. Of the other American houses built by Latrobe during his career, only 3 remain and those much-altered. The high importance of the house in terms of the architectural history of both England and America is clear and we refer to the letter by Professor Patrick Snadon, an eminent authority on Latrobe, confirming its significance in this context.

Professor Snadon singles out the interiors at Ashdown House as being important for Latrobe's legacy citing the spatial sequencing and the use of Coade stone not only as decoration but also as structural elements. The exceptional Coade stone dome of the entrance porch, the entrance hall, staircase, upper landing and features of the principal rooms on the first and second floors remain intact and are the reasons for the high significance of the house.

At Ashdown House, Latrobe utilised existing Tudor buildings to form a service wing. An extension was built extending back to the rear of the house between 1808 and 1842 and, after the house became a school in 1886, a further extension to the east was added. During its time as a school, further buildings were introduced, including in the 1930s, a Chapel in Arts & Craft style which is also a war memorial. Additional buildings and extensions of a relatively functional kind were added to the site around and to the rear of the main house during the later 20th century.

The house is located within the High Weald Area of Outstanding Natural Beauty and was built on rising ground overlooking open lawns and countryside dotted with trees. There were clear ties between the owning Fuller family and Humphrey Repton at the time the house was built and there is evidence that his design ideas were directly influential in the landscaping. Around the house and to its rear were some more formal gardens and a walled garden, now lost. The setting and remains of the original landscaping of the house are important elements in its overall significance.

Our Assessment

Our principal concerns regarding the proposed development are:

1 The impact of the insertion of a lift to the rear of the house in an existing light well to allow access to the second floor where a separate apartment will be created. As this is a significant intervention which could potentially impact the external appearance of Ashdown House, there should be more detailed visualisations showing the visual impact of the addition from different perspectives in addition to elevation drawings CC and DD.

2 The Heritage Impact Statement states (at paras 5.29 and 5.32) that the impact of the proposed changes on the main house will be "wholly limited" (as regards the ground and first floor, Apartment 1) and that where in Apartment 2 (the second floor) the historic fabric is to be removed and new partitions introduced it "is essential in order to provide a functional residential layout...and separate it off from the remaining building". It is difficult on the basis of the information provided to assess the impact both of the proposed work to create Apartment 2 and the impact on the very significantly important interiors, including the half-domed bedrooms specifically mentioned by Professor Snadon in this letter. It is also impossible to assess the impact of the insertion of necessary services for kitchens, bathrooms, lighting and heating in either of the proposed apartments as this level of information is not included.

3 The extensive interventions involved in the conversion of the early 19th century extension to the main house into four vertical units including the insertion of doors and windows in the stone façade of the rear of this building. There is no specific analysis of the interior features of this section and, absent a detailed listing entry, it is difficult to assess what is being lost in terms of details. Despite its role as a service wing, there could be important elements that should be preserved that tell the story of this area of the house. In addition, the reconfiguration of the extension to create 4 flats clearly disturbs the floor plan and operation of the original space. Despite the Heritage Impact Assessment acknowledging the "relatively high levels of alteration internally" and the removal of "historic 19th century walls, chimney breasts and doors and other elements of historic joinery where surviving" (paras 5.33 and 5.34), it is assessed as having a low level of less than substantial harm. We would challenge this, not least on the basis of the proposed insertion of doors and windows in the rear stone screen wall which it is thought was part of the house's original conception.

4 The conversion of the 1930s Chapel to a single studio apartment appears to involve relatively little intervention. However, the Chapel's role as a War Memorial should be carefully considered and the existing

memorials should ideally be preserved as close as possible to the Chapel. We also believe that the significance of the Chapel has not been adequately assessed either in the Heritage Impact Assessment or in the listing entry.

5 Despite the demolition of a number of mainly 20th century buildings on site, the proposal to build on the site of the Theatre & Art Block and Sports Hall, together with the Blue Block to create two semi-detached pairs and two terraces of three houses represents a considerable amount of new build close the listed house. The style as well as the increased height and mass of the replacement buildings will clearly impact on the setting of the listed house.

The proposals constitute a complete reinvention of the site as compared to both its original use and its subsequent use and adaptation over 100 years as a school. The subdivision of the main house and in particular its early 19th century rear extension, together with the construction of new housing around the rear of the house requires careful consideration to assess the extent of harm to the house and its setting. Depending on the extent of actual interventions required, we would assess the harm at the upper end of the less than substantial harm.

Paragraph 200 of the National Planning Policy Framework (2021) states that: *“any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of... grade I and II* listed buildings, grade I and II* registered parks and gardens, should be wholly exceptional”*.

Paragraph 202 states that where the harm is less than substantial harm *“this harm should be weighed against the public benefits of the proposals, including where appropriate, securing its optimum viable use.”*

Public benefits cannot be constituted merely on the basis that the house will be converted to a new use if that conversion involves unacceptable amounts of changes to the historic fabric. There is reference to information submitted which supports the argument that the proposed residential use is the only viable one but we have not been able to identify where this information is located. We would therefore argue that the public benefit has not been proved.

The Core Strategy Local Plan (Feb 2013) and saved policies of the adopted Wealden Local Plan (1998) require at SP02 that the *“Council will ensure that the intrinsic quality of the historic environment is protected and the heritage assets are used appropriately”*.

Conclusion

We would urge the Local Planning Authority to refuse permission for the scheme in its current form. This is on the basis of:

- (i) the lack of detail provided regarding the interventions required in the main house to effect the proposals and consequent lack of analysis of the impact of those interventions;
- (ii) the impact on the early 19th century extension, especially the original screen wall;
- (iii) the impact on the setting of the house of the new buildings;
- (iv) the absence of an up to date listing of the buildings (see also the additional observations below);
and
- (v) the inadequacy of the arguments to support the case for the public benefit of the scheme.

Additional observations

Having a comprehensive and up-to-date listing record is paramount to assessing the impact of any proposals on a listed building, as required under the provisions of paragraph 194 of the NPPF (2021) and the Planning (Listed Buildings & Conservation Areas) Act 1990. The current listing of Ashdown House does not address the interiors of the main house which are of the utmost relevance to its significance. Neither do they assess the other elements of the building's additions and extensions. The 1930s Chapel is very likely listable in its own right and the Archaeological Interpretation Survey has demonstrated that a large portion of Tudor fabric remains. Given the significant and extensive changes proposed to Ashdown House and its setting under this application, we consider that it is crucial to reassess the listing as a matter of urgency.

As a related matter, the site is currently unoccupied and we understand that no maintenance has been carried out, allowing damage, including in particular water damage, to the building. As a result, there are serious concerns for the condition of its precious interiors. Maintenance of a listed building should not be dependent on the outcome of planning proposals and should be attended to as a matter of urgency.

I trust that these comments are useful to you, and I ask that you keep me informed of further decisions or consultations regarding this application.

Yours sincerely,



Liz Fuller

Buildings at Risk Officer

cc. Historic England
Victorian Society
Georgian Group