

After campaigning for six years to save the Drill Hall I whole-heartedly support Rockfish in their plan to reuse Sidmouth Drill Hall and retain the internal elements.

However, I can not support the external appearance of their proposed design which I believe is a misunderstanding of the history of the eastern end of the Esplanade and out of character with the Conservation Area. As they say, 'The devil is in the details'.

Background and history

Grainge Architects have said to me that they found my website <https://drillhall.historic-sidmouth.uk/> very useful, however despite frequent offers of help, to them and Mitch Tonks since his bid was chosen, they have refused to enter into discussions with me. I feel that this is the reason that they have misunderstood the history of the east end of the Esplanade and got it confused with that of Eastern Town which lies behind the high bank of the Esplanade.

Eastern Town was a working district of Sidmouth but the Esplanade has not had 'industry' on it since the York Hotel and York Terrace were built on the old boatyard in 1807.

The Gas Works (1873) were built back from the Esplanade, in Eastern Town; with the manager's house, a large and imposing building called East Cliff(e) House, built in front of it on the Esplanade blocking it from the view of visitors.

<https://www.britainfromabove.org.uk/image/epw039689?search=sidmouth&ref=18>
The garages seen on the Esplanade, to the west of Ham Lane, catered to the tourist trade.

East Cliff House and Drill Hall

<https://drillhall.historic-sidmouth.uk/wp-content/uploads/2019/08/drill-hall-front-Ankins-a.jpg>

The eastern end of the Esplanade has been seen as leisure area since at least 1882, the only working use was the same as the rest of the beach. Fishermen's boats landed and disgorged their catch all along the beach. The fishermen's sheds were constructed in 1929 tucked behind the Esplanade where they still are, before that there were no sheds.

The Esplanade is in the Conservation Area, the fisherman's sheds and the rest of Eastern Town is not.

Mr Radford bought the Ham Meadow in 1888, this piece of land included what is now the Esplanade and went down to the sea; as private land it was for leisure purposes.

When he gave some of it (1895) for the Drill Hall to be built and used for community activities, and gave the rest (1896) to the town for leisure and recreation it was still used for leisure purposes.

The Local Board confirmed this use (1929) when it completed the Esplanade with a turning circle so people could drive along viewing the sea and then return, created a large public toilets and shelter, and laid out the Ham as a Pleasure Ground.

Grainge Architects' vision of a working type fishing shed to represent what was present in the past is misconceived.

Planning Application

In their Planning Application the details given by Grainge are sketchy and in some cases contradictory, so it is impossible to tell what they really intend.

Their perspective drawing shows blue shutters against a mid grey building, the elevations say it will be grey shutters against dark grey walls.

They say the cladding will be 'charcoal-coloured weather resistant cladding board', but later mention 'dark timber' and it is unclear as to whether that is a colour or a material. Will it be wood, UPVC/Vinyl or <https://www.cembrit.co.uk/cladding-panels/plank> ? Timber cladding is not as weatherproof as many materials and the colour of timber would fade with age while man-made material would not. It is important to know the precise material before it is accepted. An indication of the RAL colour would be helpful.

The proposed extension would be roofed with 'profiled roof sheeting' but materials are not given. It seems most profile roof sheet is box profile metal, is this what they intend? There are no metal roofs in the Town Conservation Area except for the, very small, sloping one over the rear stairs of the Drill Hall. To take such a minor element and expand it to be approximately a 5th of the roofing material of the building is anomalous for both the building concerned and the Conservation Area.

Grainge Architects consider the views of the site in the Design, Access and Heritage Statement 3.1. However they severely underplay the number of views on which it would have an impact. They state that 'narrow angles of the front facade' will be visible from the Esplanade without mentioning that the side view is also visible from the east side of the turning circle, from the seaward eastern end of the Esplanade, and from the new Sid Bridge where the SW Coastal Path enters the town.

Views from the Esplanade are not as narrow as they would be on a normal road due to the width of the roadway combined with the wide paved area of the seafront walk.

The above mentioned side view will lose some architectural interest as the arched tops to the windows will not be retained, nor will the windows be matched to the remaining original window design.

<https://drillhall-rescue.historic-sidmouth.uk/july-2018-interior-photographs#jp-carousel-727>

The original French Doors have been replaced by fire-doors but the framing and the opening windows are original to 1895, it would be a shame to lose them now.



<https://drillhall.historic-sidmouth.uk/wp-content/uploads/2016/02/1913-postmark-detail.jpg>

The Drill Hall is visible from the west end of the Esplanade and from the area around Chit Rocks because of the bend in the Esplanade, and of course it will be very visible from the sea.

The Sailing Club is one of those buildings which polarises opinion, it does not fit in with the other buildings on the Esplanade. Many people find it ugly, so to attempt to match it in style is inappropriate. At the very least the proposed balcony should match the ironwork or woodwork balconies seen along the Esplanade as a whole, rather than the bulky utilitarian design seen on the Sailing Club.

Grainge plans do not mention the basement at all.

Even if they don't propose to use it there should be mention of work to ensure that moisture does not travel from the shingle bank on which the Esplanade is built into the space around the Drill Hall building, at an absolute minimum. When the balcony/outdoor seating area is installed it will make it much more difficult for moisture to evaporate and this will put the brickwork of the basement at risk.

The basement is a very large area covering the complete building footprint and can not just be ignored.

Descriptions are not consistent throughout the document, for example the proposed main roof covering is variously described as tile and slate. Until they are sure what they want to do how can a planning decision be made?

Conservation Area

The design is not consistent with the identified characteristics of the Conservation Area in which it stands.

The most recent Conservation Area Review available on the EDDC website is from 1999 <https://eastdevon.gov.uk/media/561004/sidmouth1-3caa.pdf>

In the Town Conservation Area as a whole, and along the Esplanade, the identifying characteristic is that of pale walls with darker detailing. Even the Sailing Club with its atypical building design conforms to the colour scheme.

The facade of the Drill Hall was altered in 1931 but the rest of the building still shows interesting architectural features. If these features can not be visibly retained then that is a matter of practicality, however, there is no reason for the colour scheme not to be adhered to. Rockfish restaurants are all different in style so needing to follow a corporate design is not an issue.

Sid Valley Neighbourhood Plan

<https://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/sidmouth/>

The emerging Neighbourhood Plan considers Port Royal thoroughly and also lists important view points. This Plan is a material consideration and yet is not referred to by the architects. I am positive they are aware of it as I mentioned it to them.

Policy 2

Policy 7

Policy 16 a. The development of a new building should not have an adverse impact on the character of the area
Sid Valley Place Analysis

The proposed design does not meet any criteria specified for Port Royal. These criteria were established by surveys so reflect the views expressed by residents.

There is no mention of sustainable practices, it does not encourage using alternative forms of transport to the car, it does not respect the heritage or local distinctiveness of the area, etc.

Jurassic Coast World Heritage Site

https://jurassiccoast.org/wp-content/uploads/2012/07/fact_sheet_final-_jurassic_coast.pdf

This map and Plan demonstrate the sensitivity needed when considering development which is on the precise edge of a WHS. The WHS finishes at the Sid and comes back into force at Jacob's Ladder.

https://jurassiccoast.org/wp-content/uploads/2006/07/jurassic_coast_plan_lowres.pdf

The Executive Summary mentions removing eyesores so one can presume they would not be in favour of creating them.

Aim 2 is to conserve and enhance the Site and its setting for science, education and public enjoyment (...) This Aim also encourages improvements to the physical presentation of the Site, with actions such as removal of eyesores,

3.2 The setting of the Site and buffer zones

3.2.1 Setting

There is a need to protect an area around the World Heritage Site that includes the "immediate setting" and the "important views and other areas or attributes" that help make the Site what it is, and emphasise its importance. Outstanding Universal Value as a cultural phenomenon means that our experience of the Site and its setting is part of this equation, and it is not just protection for the intrinsic value of the geology.

Guidance from UNESCO states that *"properties must be protected from all threats (...) Intrusive development can harm its setting, or the views from it or of it."*

3.2.2 Buffer zone

UNESCO require that *"For the purposes of effective protection (...), a buffer zone (...should...) give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection..."*

Dorset and East Devon Coast WHS buffer zone arrangements

Pre-World Heritage Site designation, the UK Government had already put in place appropriate conservation measures for the Site and its setting, through systems of protective designation. (...) This range of conservation designations ensures statutory protection for a greater area than any possible additional buffer zone for the Site, and protects its setting adequately. The identification of a separate buffer zone for the Site is therefore considered unnecessary.

Pg 20 Protection through the Planning system

National Planning Policy

(...) authorities should *"treat relevant policies in Management Plans as material considerations in making plans and planning decisions, to take them fully into account when devising core strategies and other local development documents."*

In respect of the setting, it states that *"it is important to consider carefully how to protect the setting of each WHS so that its outstanding universal value, integrity, authenticity and significance is not adversely affected by inappropriate development."*

Local plan

The proposed design does not accord with the following sections of the Local Plan.

Strategy 44 - Undeveloped Coast and Coastal Preservation Area Land around the coast and estuaries of East Devon, as identified on the Proposals Map, is designated as a Coastal Preservation Area.

Development or any change of use will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas. The coastal Preservation Area is defined on the basis of visual openness and views to and from the sea.

Although the Drill Hall design will not physically block the visual connection to adjoining areas the dark colour would create a visual stop to the eye, rather in the way that an exclamation mark concludes a sentence!

18.55 The underlying geology of East Devon and the agriculture it has supported have ensured we have an interesting range of local building materials which have been used traditionally to give an identifiable built heritage of exceptional quality. Regrettably, more recent development has often been of lesser quality, with little reference to the place. We see local distinctiveness, in building materials and form, as essential to the quality and appeal of East Devon and we will:

- a) Promote high quality locally distinctive design standards.
- b) Value, conserve and enhance our historic environment.
- c) Require sustainable construction techniques to be included in projects.

18.58 We wish to see the use of traditional materials and methods in buildings as we see this as a means to help define and enhance the quality of the built environment. (...) We want to ensure that, in the future, buildings in East Devon will make obvious use of local materials in sympathetic and traditional styles and forms. This emphasis on local distinctiveness will be a challenge to 'standardised' design approaches and 'off the peg' solutions. It does not mean that contemporary or modern designs cannot be used but it does require that designers think far more about how local materials and local traditions should inform and be integral to their work.

Strategy 48 - Local Distinctiveness in the Built Environment

Local distinctiveness and the importance of local design standards in the development process will be of critical importance to ensure that East Devon's towns and villages retain their intrinsic physical built qualities. (...) Use of local materials and local forms and styles will be essential to this distinctiveness.

18.60 We regard it as essential that we conserve and enhance the historic environment of East Devon. (.....) We will continue to apply existing legislation and guidance in the most effective way to conserve the built environment.

Grainge Architect's design does not exhibit local characteristics or distinctiveness, instead being something that could be found anywhere in the country. In that way it is almost an 'off the peg' response. The colours used are fashionable not context specific.

National Planning Policy Framework

The proposed Rockfish design does not accord with section 16. *Conserving and enhancing the historic environment Paragraphs 184 to 202* in particular :-

- 185
- c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - (d) *opportunities to draw on the contribution made by the historic environment to the character of a place.*

A Conservation Area is a Designated Heritage Asset and so the following should apply when considering development which affects it.

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

I would argue that knowledge of the history and buildings of the Esplanade should be some of the 'necessary expertise' to be taken into account, and so the views of those of us with this expertise should be taken seriously. I would welcome the opportunity to be allowed to help. I am a designer so have practical understanding of limitations.

200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

The proposed design does not make a positive contribution to either the Conservation area or the WHS, furthermore it creates a false narrative about the history of the eastern end of the Esplanade rather than better revealing the significance of anything.

There was never a fish processing industry in Sidmouth so any building which looks as though it housed one is inappropriate, and a two (visible above the Esplanade) storey, >80 x 32 feet, fisherman's shed must be practically unknown in the UK. So the claims, in the Design Access and Heritage Statement, for their proposed design are not borne out.

Design, Access and Heritage Statement

5.1 'The Hall provides a key link to the historically working land use at the Port Royal end of the Esplanade': and

5.3 'give the building the aesthetic of a working fisherman's shed'

The working fishermen's sheds in Sidmouth are made of brick supporting walls with slate roofing, although the fronts are horizontal wooden planking of a natural, weathered silver grey, colour. If it was intended to match this aesthetic the design would look considerably different, not least because the planking would be in a different direction.

Historic England

Although Grainge quote from an Historic England document it is the one from 2013. Historic England were approached again in 2016 after three years of research had been done on the hall and it was understood much better.

Unfortunately, it still did not meet the criteria for listing but the Heritage Environment Record was updated to read :-

CONCLUSION: while this assessment should not be taken to undermine the building's strong local interest as the work of a local Exeter architect and as a reminder of the area's military past, it does not merit listing in a national context. It is, however, an asset to the conservation area.

https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=1438101&resourceID=7

It is likely that the proposed external design will erode, if not remove, the things that make it an asset. This then has knock-on implications for the Conservation Area at that end of the Esplanade. Weakening of the Conservation Area leads to reduced protection of the WHS.

What might at first appear to be a small matter turns into a large one when in a sensitive context.

I am aware that the footprint of the Drill Hall is not large enough for it to be a requirement that Historic England be consulted, but it would seem sensible to do so; if for no other reason than to allow them to comment on what they find to be an asset about the current building. The 'military past' may be considered significant, or not.

Historic England, in their Research Magazine Issue 13 Tourism and Seaside Special, August 2019, describes a seafront as the 'shop window' of the seaside. They also state that '*understanding how places developed, their character and significance is a vital first step in shaping change*'

I think that that the current design does not show an understanding of the second point and that it is a dark smudge on the shop window of the Esplanade.

Mary Walden-Till