

Planning Reference Ref 19/1775/FUL Sidmouth Drill Hall

Dear Planning Committee members,

I am writing to you because I will be unable to come to the meeting and speak due to being convalescent after an operation.

I am not claiming to be an expert but I do have some experience. I have a degree in Three Dimensional Design which included Interior Design taught by architects, in Post Grad training I worked on projects involving the Art and the Built Environment movement in the early 1980s, and I have maintained my interest in this area through both historical research (including the Drill Hall) and subscribing to Arch Daily which sends daily information about new materials and buildings as well as claiming to be the world's most visited architecture website. I also receive Historic England's monthly Planning Bulletin concerning national legislation and try to keep up to date with EDDC position on conservation, heritage and buildings.

Over the past 6 years the Drill Hall and its possible reuse has been my hobby. I have worked with architects and architectural designers on various plans, have created many different ones of my own; and assessed, in detail, those of others.

I hope that the following points help you in your deliberations. If there is anything which you would like clarifying or expanding on please don't hesitate to get in touch.

- 1) The current planning application for the Drill Hall does not give sufficient information for a decision for Full approval to be given. The specifications for materials are vague; and the Design, Access and Heritage statement is not detailed enough for development in a Conservation Area. (A Conservation Area is classed as a Designated Heritage Asset.) It does not consider the fact that we are constrained by the adjacent World Heritage Site. It makes no reference to the emerging Neighbourhood Plan; although Government guidance is clear that once it has been passed by an Inspection it has considerable weight as a material consideration in the planning process. It does not demonstrate consideration of the characteristics of the Conservation Area.

If this application was for Outline Planning Permission the level of detail would be appropriate but for Full Planning Permission there needs to be much more.

<https://eastdevon.gov.uk/planning/planning-permission/apply-for-planning-permission/householder-applications/statement-of-significance-guidance-notes-for-planning-permission/>

'For planning applications either related to, or impacting on the setting of heritage assets, a written statement that includes plans and photographs showing historic features that may exist on, or adjacent to the application site, including historic buildings and structures, historic parks and gardens and scheduled ancient monuments will be required. This should include an analysis of the significance of archaeology, history and character of the building/structure, the principles of and justification for the proposed works and their impact on the special character of the historic building or structure, its setting and the setting of adjacent historic buildings.

For applications within or adjacent to a conservation area, an assessment of the impact of the development on the character and appearance of the area will be required. This would include an analysis of the important characteristics of the area including significant buildings or features as well as views into or out from the proposed development.'

<https://eastdevon.gov.uk/planning/planning-permission/apply-for-planning-permission/full-applications/full-and-listed-building-consent-application/statement-of-significance-guidance-notes-for-full-and-listed-buildings/>

'Designated Heritage Asset

World Heritage Site, Scheduled Monument, Listed Building, Wreck, Registered Park and Garden, Conservation Area.'

- 2) 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 this it says

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4 BUILDING MATERIALS AND ORNAMENT

4.1 Stucco is overwhelmingly the dominant exterior finish within the Regency parts of the town. It is applied mainly to buildings constructed of brick. Exposed brickwork of similar date is also found quite widely. Slate is the most common roof covering although artificial slate is increasingly being used when roof covering needs replacing. There has also been some bitumen coating of slate although this is not as widespread as elsewhere and does not appear to be current practice. It is important to stress that coating of natural slate and introduction of artificial roofing materials should not be considered acceptable within the conservation area, particularly in highly visible locations.

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4.5 Buildings fronting the Esplanade are slightly different again. There is a profusion of balconies, bays, colour-patterned glass with lettering incorporated, (for example the Devoran Hotel), fanlights and other openings with ornate glazing bars. Timber is widely used in open work to balconies, and often including supports beneath. In other examples the balconies are supported by rounded columns and form ornate porches or covered arcades. Outstanding examples are Beach House (c.1790) and the York and Faulkner Hotel (c.1830). Many of the windows are double-hung sashes with only the upper light having glazing bars, a feature that appears to be largely peculiar to Sidmouth.

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- largely unspoilt frontages facing the sea, retaining much original detail with largely restrained updating although some PVCU double glazing is starting to make inroads. Nevertheless, generally well-balanced and co-ordinated colour schemes and discreet signage ensure an exceptional survival of seafront architecture able to be appreciated largely as originally conceived.

9 SUMMARY

9.1 Sidmouth is a coastal resort of exceptional architectural and historic interest and of national importance in terms of its representation of a particular style and quality of Regency and mid Victorian development much of which has been carefully preserved. The publication of the Sidmouth Conservation Study in August 1975 and the Sidmouth Town Centre Enhancement Programme in November 1988 as well as operation of the Town Scheme have clearly been influential in helping to maintain the high quality of environment.

9.2 The calibre of development control has generally been high and largely effective in maintaining Regency character and the continuation of a certain gentility which characterises the town and is undoubtedly appreciated by visitors. Nevertheless,

9.5 One of the chief delights of Sidmouth is the relatively unchanging atmosphere of its historic setting in spite of having had to absorb many of the typically late 20th century insertions as well as increasing pressure for retirement whilst maintaining its reputation as an attractive seaside resort. It is a delicate balance that will need to be carefully safeguarded.

Although the applicant quotes, in the Design, Access and Heritage statement, from a document it refers to as 'Sidmouth Interim Conservation Area Review' all search engine searches, come up blank for that title.

The EDDC website search does give a reference page but I can not find the document there. I feel it would be useful to see what else the document says apart from the quote given. Perhaps EDDC Planning can supply a copy?

National Legislation states

'Conservation area - an area which has been designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.'

- 3) Despite the applicant being well aware of the original appearance of the Drill Hall (they had pictures in the 1st submission of the DAH statement) they still claim that the Port Royal end of the town had/has a 'working aesthetic'. Photographs prove this to be untrue. The fishing industry was not restricted to Port Royal but spread all along the beach, and the Gas Works were set back well behind East Cliff(e) House. The aesthetic of Port Royal has clearly been leisure and tourism since at least 1882 when the Local Board were considering buying the Ham. The Ham was given to the town in 1896 for recreation and leisure, and in 1929 it was laid out as a Pleasure Ground with riverside walk.

This image from 1932 shows the Sea Front at Port Royal did not have industry on it.

<https://www.britainfromabove.org.uk/image/epw039689?search=sidmouth&ref=18>

Even Dean's Garage on the Esplanade served the holiday trade.

East Cliff(e) House changed from the home of the Gas Works Manager to holiday accommodation before it collapsed and was replaced by the Sailing Club. The Drill Hall was a proud public building, by the same architect who built Sidmouth Masonic Hall (still to be seen

in the High Street), providing Balls, Exhibitions, dances, lectures, cinema, roller-skating, etc, as well as a Reading Room and a home for the Volunteers. The Easter Buns were given out to children in the Drill Hall when the weather was wet.

[Photographs of the Drill Hall original front and East Cliff\(e\) House.](#)

- 4) The applicant quotes from the 2013 Historic England document not from the more recent 2016 one.

The 2013 document says 'The local interest of the drill hall, which has played an important role in Sidmouth's history for over a century, is beyond question; interest of this kind is appropriately recognised by the conservation area designation.'

While the 2016 one

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

'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.'

This raises the question about what things Historic England thinks makes it an asset. The most likely seem to me to be the original features which remain; which are mainly the structural but decorative arches and columns on the eastern side (which will be obscured in this proposed design) and the remaining original window features.

- 5) The details of the materials and colours to be used are very vague. The colour of the metal work is simply described as 'grey', which could vary from 'almost white' to 'almost black', while the cladding is described as 'dark grey' or 'charcoal grey'. The material for the cladding is not specified apart from it being 'charcoal-coloured weather resistant cladding board' although there is a passing mention of 'dark timber' made at one stage. This could either refer to a material or a colour. It could well be something like this
<https://www.buildingboards.co.uk/products/rcm-supertech/>

Colours are usually specified in terms of the [RAL](#) or [Pantone](#) colour charts, for the avoidance of doubt.

The width of the boards is not mentioned either and this is important because older buildings used wider boards.

On the Perspective they show a medium grey wall with turquoise /blue shutters which gives a very different effect from the front Elevation drawing which shows grey shutters. The shutters are said to be of wood but no details of design are given. Are they vertical louvers as they appear, or are they solid/horizontal louvers/close boarded? Do they slide on under-hung or over-hung tracks and are there tracks at both top and bottom? The extension is to have 'profiled roof sheeting' but what sort of profile? Will it look like corrugated iron or some other ridged design? Is it steel, or steel-look or something else?

[Link to profile roofing board examples](#)

- 6) The proposed doors and windows are of modern design despite the stated aim of creating the effect of an old fishing shed. Many firms produce double or triple glazed windows in an older style effect (<https://www.cnglass.co.uk/windows/heritage-double-glazing/heritage-slim-double-glazed-units/> or <https://theheritagewindowcompany.co.uk/products/windows/> for example).

They even reproduce the old metal Crittall style windows. (<https://www.crittall-windows.co.uk/>)

Given this, I feel that the windows could retain the [same style top openers](#) as were present in the original building without detriment to the architect's vision. This would be beneficial in reassuring Historic England that their statement about the Drill Hall being an asset to the Conservation Area was being taken into account.

- 7) World Heritage Site. In the Planning Application document at Question 13 it is asked 'Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?' It then lists 3 categories including c) Features of geological conservation importance. Although the applicant has answered 'no' to this I believe that the years of discussion which have been necessary with regard to beach management proposals prove the opposite. The areas of geological importance come right up to the Sid and any development on the Drill Hall site provides the opportunity to enhance appreciation of the WHS and the entrance from the SW Coastal Path into Sidmouth. The Hanger is also a consideration.

When the WHS was set up a legal buffer zone was not put in place as it was considered that the AONB and Conservation Area designations were sufficient 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. In particular with regard to the setting are the Areas of Outstanding Natural Beauty (AONB). These areas are afforded strong protection, particularly through the UK's statutory planning system, and the powers and duties of Defra and Natural England, the Government's statutory adviser on nature conservation. Further protection is also provided through established statutory planning policies in relation to defined Heritage Coasts, the undeveloped coastline of Portland, and the East Devon Coastal Preservation Area. The Site also lies almost wholly within sites separately identified and protected under European Law (the Habitats Directive and the Birds Directive) for their wildlife value. 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.

We need to honour that confidence in our planning control abilities.

- 8) Views into Sidmouth and of the Drill Hall. The applicant states, in the DAH statement 3.1, that only narrow angles of the front facade will be visible from the eastern end of the conservation area.
- This is true if you were to stand close to the walls of existing buildings but we all know that the Drill Hall is not experienced like that. It is seen from the east from the Esplanade and the views also include a large number of listed buildings further to the west. As is illustrated by their own photographs.
- Their statement that 'views along the coast' will not be affected by the proposed design is simply wrong. Views from the Esplanade from both east and west will be affected. This is clearly demonstrated in the emerging Sid Valley Neighbourhood Plan.
- 9) Materials, both existing and proposed are described differently in different documents. For example, roofing materials are variously described as tile or slate, so it can not be ascertained which material they intend to match to. If this application is passed as submitted then there would be a great deal of latitude in what could be claimed to have been approved.

10) The proposed design creates a fake aesthetic, Sidmouth has never had a large scale fish processing building.

To place a replica of one in such a sensitive position detracts from both the authenticity of the rest of the Esplanade and of the 'fishing' or 'working' end (which is really the leisure end). The building of the Drill Hall and the laying out of the Ham in 1929 was intended to complete the 'gentrification' of Eastern Town

11) Although the Drill Hall will indeed need to be clad for insulation purposes the wrong sort of cladding will trap moisture and result in further deterioration of the bricks.

Cladding the structure does not require the loss of detail on the east wall, if it were all clad to the same thickness (eg 75 mm every where) the detail would be retained.

None of their plans show their proposals for the basement level of the Hall. Reinstating the balcony will prevent moisture escaping from the [area surrounding the basement](#) and I was informed by architect Paul Jeffries, many years ago, that moisture was likely to come through the walls of the Esplanade into the space around the building unless they were water-proofed. As the Esplanade is built on a shingle bank water uptake seems almost unavoidable. Damp is not good for bricks. Plans for dealing with this problem need to be shown.

There are no plans at all indicating what they intend to do with the basement, which is a large area as it runs the full size of the building.

12) Further reading

[Structural Engineer's Report giving details of current materials.](#)

[Relevant National Legislation](#)

13) The applicant has had access to most of the information I have given here, as it is on my websites which they have said they found very helpful.

I have offered to provide them with any other information they need but they have not taken me up on my offer. I told them of the Neighbourhood Plan in case they were unaware of it, as it hadn't been mentioned by them.

Yours faithfully,

Mary Walden-Till

<https://drillhall.historic-sidmouth.uk/>

<https://drillhall-rescue.historic-sidmouth.uk/>

Postscript

There are many easy and inexpensive ways to slightly adapt this design so that it becomes more interesting. For example they could use the blue which they use on some of [their other shops](#)

Or they could match the balcony rails to the new bridge which is to be built over the Sid, rather than to the Sailing Club.

Or they could flatten the top of the front gable and mount a weather vane in visual reference to the [ornamental piece which was there originally](#) to create the 'Renaissance Style' envisaged by [Jerman](#).

There are almost endless variations.