

# APPENDIX 2

## Conservation Officer Response

Eastbourne Pier is one of the town's most popular locations, and one that occupies a special place in the affections of local residents and visitors to the town. The reasons for this are many and varied, ranging from its proud evocation of a golden age of domestic holiday making, the scale of its ambition and the majesty of its construction to fond personal memories of using the space as an escape from the mundanities of everyday life and as a favoured location to celebrate birthdays and milestone events.

As a premier local heritage asset, and one that is favoured with a Grade 2\* listing, it also demands careful stewardship in order to maintain the architectural, historic and social significance that generates that sense of excitement and awe. This requires that all development proposals, inevitable on such a large and exposed structure, be assessed in terms of their impact on the significance of the Pier, with a requirement that it is kept safe from ill-conceived proposals that threaten to degrade it and diminish its importance and appeal for future generations.

There are currently two separate applications tabled for consideration, which seek listed building consent to create a set of new structures for a range of commercial uses. The applications are separate, yet ultimately linked, given their combined overall impact in terms of the reconfiguration at the street end of the Pier. They address a specific deficit situation following the major fire in 2014, which destroyed the large pavilion- the 'blue room' of fond memory- and effectively formed a large open area after its demolition, redefining its established form.

The current owners contend that the applications work with the grain of the Pier, by taking "architectural cues from the remaining built form" and creating new spaces that enhance the existing capacity for "flexibility, multi-purpose function and use ; and it is this adaptability that will ensure the demands of such an important tourist attraction will be met ensuring the Pier has a sustainable future." The placement of the new units in such a way as to create a symmetrical design that honours the original design of the Pier is also seen as an enhancement "of the legibility of the historic context", while the use of timber and steel structures, with zinc roofs, is argued as evidence of sensitivity to the significance of the historic asset through the use of an approach that replicates a traditional form of construction. The applicant acknowledges, however, that the presence of uPVC on infill panels, windows and doors has an adverse effect and introduces a levels of harm, while also contending that this harm is less than substantial and mitigated by the public benefits of the proposal. The case advanced is that uPVC is cheaper, quicker to produce, easier to maintain and potentially enabling of other long- term projects through the rollover of any cost savings into other development works.

As Historic England note in an instructive and carefully nuanced consultation response, the loss of the large pavilion in the 2014 fire has been " particularly harmful to the playful silhouette of the roof scape of the Pier, creating an open area that is described as "inhospitable" and " out of keeping" with an established character of the Pier that extends back to the inter-war years. They differentiate

between the two applications, describing the “authentic recreation” of the units lost to the fire as the “least problematic” element, but with a concern over the use of uPVC as an element of the build. They express greater caution over the design for the larger new pavilions, recognising that their presence, if agreed, will change the character and appearance of the Pier, while also acknowledging that the works outlined in these applications form part of a broader programme of works alluded to by the applicant in his heritage statement and at a helpful three- way meeting between Historic England, the Pier management team and the borough Council in mid-January. Historic England, while welcoming these positive aspirations for the Pier, suggest that information on medium term planning currently in the public domain is insufficiently detailed to make any rounded judgement as to how individual elements such as these applications relate to, and align with, that overall shared vision. They also raise concerns about the materials being proposed for the new structures, most notably the use of uPVC. Specifically, they question whether its use on the Pier by previous owners can be used to provide a precedent, or that it has the potential to deliver quicker results or that any economies derived through its use as an element in these applications would necessarily percolate through to more rapid development elsewhere on the Pier. In their own words, “we must be concerned with the long term historic significance of the pier and not short term expediency”, with a stated preference for the use of timber for both recreated and new structures. Having formally identified concerns, they recognise, however, that the buck stops with us at Eastbourne Borough Council and note that we will need to take a final view as the local planning authority.

In fact, we already have some internal commentary on the applications following their consideration at the Conservation Areas Advisory Group meeting on 20 February 2018, at which both were reluctantly agreed, on the basis that, while imperfect, they create the conditions for enhanced commerciality and could allow for additional future development works at the Pier in hitherto closed areas.

In many ways, in a conservation conversation characterised by heartening collegiality, this issue of a trade between wider public benefit and a compromise on materials goes to the core of disputed territory. Put simply, it is a case of whether the promise of a fully restored period as some indeterminate point justifies the use of a building design, in the case of the larger pavilions, and materials, uPVC, that are not authentic, do not invite positive feedback or enhance the character of the asset. For the applicant, it is a price worth paying. Historic England, by contrast, adopt a position of greater caution. Tellingly, though, they also intimate that the potential for resolution exists.

On reflection, both positions are defensible. Though the applicant’s proposal might initially seem absurd, since it transforms the way we make use of, and ‘read’ the Pier through use of a pedestrian building as its major contributor, a new layout and the use of a material that is ‘out of keeping’ with this Victorian structure, it is possible to discern some merit in the proposal . Specifically, it attempts to make use of the area left bare by fire damage, and to develop a positive patterning that attempts to create a pleasing symmetry in design terms. It is also architecturally inclusive in terms of harnessing the full potential of the entire Pier. At an economic level too, it is to be hoped that additional footfall and spend arising out of the new build structures will generate higher income, which can in turn contribute to a structured programme of development that opens up and rehabilitates currently closed areas such as the theatre. This is a compelling proposition.

Structures change and grow over time as fashion change and new functions emerge, and Piers are no exception. Eastbourne started off as a pier originally characterised by promenading before adapting to provide opportunities for amusements, entertainments and pleasure, so the concept of dynamism and change is an embedded one, and the notion of operating the Pier as a kind of living museum is both misguided and fanciful given its core function. That said, development needs to evidence purpose, clear thinking, and an ability to work with the grain of the structure. One of my major challenges with the current proposal is the lack of supporting material to reinforce the headline proposition that recreating 2 representations each of 2 existing structures will necessarily create new footfall and benefit simply by being there. There are no worked-up proposals for us to assess, and we have no sense of what use the buildings will be put to and/ or whether those structures best suit those still unknown functions, raising the spectre that these substantial new spaces will prove inappropriate and lie empty or be put to temporary ad hoc uses with no economic gain to mitigate what the applicant's agent concedes will be an adverse effect. I note that previously exposed areas at the sea-end of the Pier intended for commercial use remain empty after almost a year.

My other major challenges concern the design of the larger pavilions and materials being used, specifically the incorporation of uPVC into the structure. The application draws on existing forms, and references the 'like for like' element of the application, but in the case of the larger pavilion especially, models a contemporary structure that does not invite praise. Indeed, the Council's own independently commissioned Eastbourne Pier Conservation Strategy, published as recently as 2007, characterised the 'Victorian tea rooms', the inspiration for the larger pavilion, as an especially weak building. We may be honouring a structure that is already in place, but the homage operates from a very low base. The significant presence of uPVC on the tea room building undoubtedly contributes to this underwhelming assessment and its visible identity on all of the replacement buildings if agreed will simply reinforce its overall impact on the Pier. All parties agree that this exerts an adverse effect on significance and is a major cause for concern, and the supporting arguments raised in defence of its use are simply not compelling. Generating a structure with timber windows, doors and infills is unlikely to require little additional effort, or generate substantial additional work if these new areas are well maintained, a proposition that should not trouble the applicant given that the Pier already works with large areas of timber and operates a near continuous maintenance regime as a result of its exposed coastal location. I accept that the initial outlay for timber is likely to be higher than more price-sensitive uPVC products, though the combination of a decidedly limited lifespan for the latter and the consequent need for early replacement suggest that any economic advantage from using uPVC is rather less than imagined.

Overall, my feeling is that however supportive the authority wishes to be supporting the work of the Pier, and great effort has been invested in generating an enabling and collaborative culture over the last eighteen months or so, the mitigation made is not strong enough for us to suspend our concerns about impact on significance, most especially as regards material use. This reflects the Pier's prestigious 2\* listing, and the primary requirement for the LPA to safeguard it for future generations. A heritage asset only has value as long as it retains the significance that conferred this protected status in the first place and, however attractive a well-developed commerciality may be for an economically sustainable future, a diminished asset is compromised for good.