



Historic England

SOUTH EAST OFFICE

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Direct Dial: 01483 252038

Our refs: P00739491&

20 February 2018

Dear Chris,

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**EASTBOURNE PIER, GRAND PARADE, EASTBOURNE, EAST SUSSEX, BN21
3EL**

Application Nos. 171398 and 171394

Thank you for your email of 12th February regarding further information on the above applications for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Historic England Advice

The statement of significance and heritage statement dated 11th February takes us a little further but not I suggest as much as is possible. The document is long on direct quoting of policy and guidance and short on detailed analysis of the significance of the pier in its entirety or for its key components. I was not clear whether it was intended as a statement for the whole pier to be used for all future proposals or whether it was intended just to support the two most recent applications. If it is the former it is not adequate.

Our meeting on 15th January was I think helpful in building consensus about a way forward for the pier. We share with Mr Gulzar an objective to make it successful and financially viable so that its costly care and maintenance might then be more affordable, the backlog of repairs be steadily addressed and the pier appropriately enhanced including for its "bottom line" operation. We think that future investment leading to changes should pay attention to the existing strong historic character of the pier which typifies what you would expect to find at a late Victorian and Edwardian pleasure pier. This said we accept that piers have nearly always evolved during their lifetimes in order to respond to changing tastes and public expectations. Within reason, we can accept future changes to Eastbourne Pier providing these are approached in ways that sustain its overall historic appearance and are based on a good understanding of what is special about the pier.



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We have identified the loss to the fire of the large pavilion as particularly harmful to the playful silhouette of the roofscape of the pier that makes it one of the most pleasing examples to see in longer views and a significant contributor to the character and appearance of Eastbourne's seafront. The repair of the substructure and reinstatement of the decking has addressed much of the harm caused to the fundamental structure of the pier, including Birch's original intent. It has however created an open area which is inhospitable for visitors and out of keeping with the character of the pier that has existed since 1925 if not earlier. This area is now more representative of the promenade original character of the pier. We think that the pier is best experienced for its fully developed historic form and not as a mixture of characters. We accept that there is also a financial imperative to address the loss of the pavilion in order to strengthen income streams and thus the funding with which to care for, conserve and enhance the pier.

Of the two applications we regard the authentic recreation of the units lost to the fire as the least problematic. The model of the existing units can and should be accurately followed to ensure an appropriate recovery of the structures before the fire. The question of what materials to use is perhaps the outstanding question - see below.

The two "new design" pavilions in the location of the destroyed large pavilion require perhaps most careful consideration. If you accept that turning the clock back to the day before the fire is not appropriate (and we do not see how this can now be enforced) then we think the consideration should be whether the design, character (inc materials) and location of the new structures avoids causing any harm to the significance of the pier and do they amount to an enhancement. We can see how thought has gone into the design of the new buildings and that these respect the symmetrical appearance of the pier that is a key characteristic of its historic appearance. We have not seen any illustrations of how the new structures would appear in long views and this might be helpful in judging whether these have a sufficient scale to help recover some of the past appearance of the pier. They will certainly not replace the single lost large pavilion and so a new character and appearance to this part of the pier will be established.

We discussed at our meeting the long term plans for the pier which we understand include re-opening of the theatre building/night club at the seaward end. Without wishing to see a full business plan and financial information which might be commercial in confidence we wanted to know more about the medium term plans for the pier so that as each piece of what must be a complicated picture comes forward for permissions it can be set in the context of an agreed and shared vision.. I do not think the heritage statement provides this and it would give us all confidence if the current applications and planned future ones could be set in such a context.

I think the biggest issue raised by the two current applications relates to the materials



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to be used and specifically whether UPVC should be permitted to be used for the entirely new structures. That such material might have been used in past repairs by previous owners (presumably without LBC) does not in my view provide a precedent. We do not accept the suggestion that UPVC should be accepted because it will be quicker to deliver results. Nor can we accept the hint of a suggestion that use of cheaper materials would enable the available funds to be made to go further and thus results to be delivered sooner. We must be concerned with the long term historic significance of the pier and not short term expediency. I am doubtful that the historic appearance of timber sections and painted wood can be accurately replicated by the use of UPVC and I am aware that debate continues about the duration of the lifetime of man-made materials and the potential to repair these when they fail. I accept that use of timber may be more expensive and that it requires an on-going need for maintenance through regular painting but in terms of sustaining and reinforcing historic character I think we must prefer timber for the external appearance of both recreated and new structures. This is a matter that your Council will need to come to a final view about based on our advice and that by the CAC. You might for example decide that pier structures have constantly evolved and made use of the then available materials. For what will be 21st century additions I think the important factor is that these have the right character and appearance, both at first sight and on closer inspection, alongside the historic parts. I do not think UPVC should be used to repair historic structures and that through time any past use of such materials should be reversed as and when the need for new works arises.

If you think that your Council now has enough information with which to decide both applications we would have no objection but we think that this would need to be subject to conditions to control the materials and details (including sections of individual structural elements). You would then need to work with the pier owner and his contractors to ensure that the conditions are met. This probably means agreeing large scale drawings in advance and then approving samples of materials and workmanship. Since we want the overall coherent appearance of the pier to be recovered by new works I suggest that colour schemes should be consistent throughout the pier and are best based on historic precedents.

Recommendation

Historic England has concerns regarding the application on heritage grounds but we think that these are capable of resolution.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 132-134 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and under section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to



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pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Peter Kendall

Principal Inspector of Ancient Monuments

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Notes for Page 4

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