

THE ARCHERY GROUND St LEONARD'S-on-SEA

ASSESSMENT OF HISTORIC ENVIRONMENT SIGNIFICANCE AND ASSESSMENT OF IMPACT OF PROPOSED REDEVELOPMENT

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- 0 STAG have asked me to make an assessment of the significance of the Archery Ground site and an assessment of the impact on that significance of proposals in planning and listed building applications currently before Hastings Borough Council (February 2011).
- 0.1 These assessments may be published by STAG, in whole or in part, and may be quoted by Hastings Borough Council or the applicants in reports or debates in connection with the application. I assert my moral right to be identified as the author of this assessment in accordance with the Copyright, Designs and Patents Act 1988 Sections 77 and 78.
- 0.2 I do not own property that is affected by the planning application, nor am I related to anyone who owns such property. My comments are made in compliance with the Code of Conduct of the Institute of Historic Building Conservation. My credentials for making such assessments are set out as an Appendix.
- 0.3 Central Government guidance on the application of planning legislation to the historic environment was given in *Planning Policy Guidance 15: Planning and the Historic Environment* [Department of the Environment and Department of National Heritage: September 1994] (PPG 15). PPG15 was superseded in March 2010 by *Planning Policy Statement 5: Planning for the Historic Environment* [DCLG: March 2010] (PPS5) and detailed guidance in *PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide* [DCLG, DCMS, English Heritage: March 2010] Although the PPS5 was issued after the planning and listed building applications were lodged, it nonetheless applies.
- PPG15 had stated the need for understanding the historic environment before proposals were made to alter it. PPS5 says that establishing the significance of a Heritage Asset is a key element of plan-making and decision-making.
- A Heritage Asset may be a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions [PPS5].* Designated Heritage Assets include listed buildings and conservation areas.
- 0.4 My Assessment of Significance is made in accordance with PPS5 guidance and in the degree of detail that the local planning authority should expect in planning and listed building applications. In the absence of such degree of detail (and accuracy) in the application documentation, my assessment may supplement the local planning authority officers' own knowledge-base, when assessing the applications and advising Planning Committee Members.
- 0.5 It is important that an Impact Assessment is objective and is not merely subjective opinion on the aesthetics of an application. My impact assessment is also made in accordance with guidance on objective criteria in PPS5. It is the type of assessment that the local planning authority's specialist, the conservation officer, should make in order to advise planning officers in making recommendations to Planning Committee Members.

1 THE SITE

The site of the current application is larger than the original Archery Ground, it includes Archery Villas (referred to as 'The Terrace' in the application documents and I therefore use that name for continuity, although do do so continues an inaccuracy), on the opposite side of the road to the south east quadrant of the original Archery Ground, and buildings beyond with frontage to West Hill Road.

- 1.1 The site is within the Borough of Hastings' Conservation Area 4 West St. Leonard's, adjoining Conservation Area 2 Burton's St. Leonards [*sic*]. Conservation Area 2 was later upgraded to being of Outstanding Importance in recognition of its national significance. The only other Hastings Borough conservation area so designated is No. 1 Old Hastings.

2 ASSESSMENT OF SIGNIFICANCE

2.1 THE BURTONS

St. Leonard's was developed as a new town on the Sussex coast from 1828 by James and Decimus Burton. The development is described in detail in J Manwaring Baines' monograph of 1956. [*Burtons' St. Leonard's*: 1990 edn. pub. Hastings Museum and Art Gallery, Burton St. Leonard's Society and Hastings Urban Conservation Project] Buildings of the new town are attractively illustrated in Michael Barnard's *A Walk Round Burtons' St. Leonard's*. [East Sussex County Council: 1977]

- 2.1.1 James Burton (1761-1837) was "...the most enterprising and successful London builder of his time" [*A Biographical Dictionary of British Architects 1660-1840*: Colvin H: Yale: 1995]. A collaborator with John Nash in the early development of London's Regent's Park, he was active when the roles of builder and architect were not mutually exclusive.

- 2.1.2 At Clarence and Cornwall Terraces, Regents Park, which Burton built, for Nash as developer, he arranged his son for Decimus to be architect.

A significance of the working relationship between father and son is the inter-relationship of design and construction before the separation of the profession of architecture from the industry of construction.

- 2.1.3 The importance of Decimus' contribution was noted by Sir John Summerson [*Architecture in Britain, 1530-1830*: Yale University Press Pelican History of Art Series: from 1953: 9 editions: p321] "*Decimus Burton's classical villas at Calverley Park, Tunbridge Wells, and the same architect's Gothic Villas at St Leonards, are in the same category*" (deriving their inspiration from Regents Park).

Professor James Stevens Curl assessed Decimus as one of the giants of architectural talent in the Georgian period [*Georgian Architecture*: Curl JS: David & Charles: 1981: p.203] although strictly, the Georgian period ended with the death of George IV in 1830. Georgian architectural style of the late 18thC evolved into the eponymous Regency style by the first quarter of the 19thC but then only slowly changed (at least in urban architecture) until mid century, when a more eclectic Victorian style becomes recognisable. Thus, whilst James was indeed a Georgian, but Decimus was both Georgian and Victorian.

- 2.1.4 The work of both Burtons is significant as being of that transitional period from Georgian to Victorian and the additional significance of Decimus is that he was one of the principal architects of the high Victorian period.

2.2 DECIMUS BURTON

- 2.2.1 Decimus Burton (1800-1881) followed the typical architectural training of the early 19thC, serving articles as an assistant and attending the Royal Academy School under the professorship of Sir John Soane.

Decimus's body of design work was more substantial than his father's, 135 projects for estates or individual buildings being listed in his obituary in *The Builder* [volume xii: 1881: p779]. These included prominent public works such as the Hyde Park Screen, the Athenaeum in Pall Mall, the Palm House at Kew and gardens and buildings for the Regents Park Zoo [*Design for the Royal Botanical Society Gardens in Regents Park By Decimus Burton, 1840*]:

URL: \http://www.hmag.org.uk/burton/regents.aspx].

These parkland projects and estate developments, such as the new town of Fleetwood in Lancashire and Calverley Park at Tunbridge Wells, show that Decimus went beyond design of mere individual buildings to the design of both townscape and landscape. He would be regarded as equally significant in landscape design as in architecture.

- 2.2.2 Colvin [*ibid*] says "*To what extent James Burton was his own architect at St. Leonard's and elsewhere, and to what extent he relied on his son Decimus for architectural assistance is not clear. But at St. Leonard's the new town is said in a contemporary source (Robson's Commercial Directory of 1838) to have been built 'upon the plans of Decimus Burton, the Architect'.*"

The 1827 plan for a new town in the Hastings Museum, [*Design for a seaside resort By James Burton, March 1827*]:URL: <http://www.hmag.org.uk/burton/foundstleo.aspx>] signed JB (for Burton senior) shows a colonnade parallel with the sea, gardens behind and a parallel block with adjacent buildings quarter circular in plan curving towards the sea. However it may not have been drawn for a particular location. A plan from the following month, when the purchase of land from the Eversfield Estate had been agreed, has a strict grid pattern with formal rectangular gardens [*Design by James Burton entitled 'Harold plan' April 1827*]: URL: <http://www.hmag.org.uk/burton/foundstleo.aspx>] which was more economical in construction but less charming than what was to come.

Behind the level sea shore, site contours would not allow the formality of James' 1827 grid. Decimus's plan of 1846, six years after his father's passing [reproduced as Plate 4: Manwaring Baines: *ibid*], shows the current plan for the higher parts of the town.

The topography of the site behind the beach influenced the layout of the roads and the siting of individual houses. This reflected developments in architectural theory of the time where "*the symmetry of and Neoclassicism of the seafront is abandoned in favour of a playful, scattered, asymmetrical Picturesque.*" [*Regent's Park by the Sea*: Nathaniels E: *The Georgian* (magazine of The Georgian Group): Issue 2: 2010]

Decimus's work may be seen as a development of the English Landscape tradition but his sylvan landscape containing individual architectural elements was the then novel idea of *rus in urb* (countryside in the town), and significant as an earliest example.

2.2.3 This is also historically significant in that the placing of buildings within an informal landscape is classically Greek, not Roman. Liberal middle class politics had been the spur to the Great Reform Act of 1832 and the middle classes preferred the democratic principles of ancient Greece to the imperialism of classical Rome or the recently vanquished Bonaparte.

2.3 THE ARCHERY GROUND

2.3.1 Before Decimus' plan of 1846, a 1834 birds eye engraving also in Hastings Museum [Birds eye view of St. Leonard's on Sea Engraving c.1834: URL: <http://www.hmag.org.uk/images/burton/947.31.4.jpg>], shows the wooded valley that was to become the Archery Ground, undeveloped, as a small tear shaped parcel of land. This pre-development scene is significant in showing how the topography of the site affected the planning of roads which still exist as the outline pattern of the two Conservation areas.

2.3.2 The Archery Ground's wooded valley relates, in smaller scale, to the larger tear drop shape of the St. Leonard's Gardens, which are the centre-piece of the town's development. Gently curving roads around each of these, set a characteristic of the new town which contrasts the long views of the straight seafront terraces with the contained views along roads curving (not meandering) through a wooded landscape, with detached and semi-detached villas and crescent terraces presented in varying oblique views. This is significant in showing the Archery Ground as part of the new design language contrasting with the classically inspired Georgian grid layouts.

2.3.3 As at the Calverly Estate in Tunbridge Wells, locally won stone was used as a principal construction element. This was good sense for a developer. Although James Burton's own house (Crown House, Marina) was prefabricated in London and brought round the coast by ship, the beach at St. Leonard's was not an easy place to unload building materials and the South Coast railway line was not open until 1846 and the line from London did not reach the town until 1851. Thus, use of local materials was economically desirable as well as visually attractive in relating the buildings to their locality.

What was to become the Archery Ground was a quarry for building stone and after quarrying the site was landscaped. This had the effect of flattening the southern end of the site and emphasising the steepness of the bank at the northern end. Its dense tree screen at the top of the bank separating it from the encircling road.

The Archery Ground therefore has significance in being the site of the quarry where stone for the St. Leonard's development was won and in showing the pre-development shape of the site with its curving screen, present before the site was brought into use.

2.3.4 As the Design & Access Statement notes, there will be little prospect for archaeology in the site. It was a un un-built field before the quarrying and this reduced ground level below the archaeological threshold. However, the 'glen' created at the top of the site by quarrying, has significance in much the same way that pre-historic earthworks have a significance that endures even when any archaeological finds have been removed or re-buried.

Because of this, the Archery Ground site itself might be regarded as a Heritage Asset in terms of PPS5.

2.4 SOCIAL HISTORY OF THE ARCHERY GROUND

Archery was one of the few sporting activities in which women could participate alongside men, again appealing to the liberal middle class politics of the mid 19thC. In 1835 The Duchess of Kent and her daughter, Princess Victoria, became 'Patronesses' of the St. Leonard's Archers and on Victoria's accession to the throne she gave permission for the society to be renamed The Queen's Royal St. Leonard's Archers. The Prince Consort later also became a patron. A Prize Meeting was held each year and in 1865 five hundred spectators watched over forty archers compete.

This planned use of the site therefore has local historical significance that points towards wider significance in social history and the relationship of the Victorian Royal Family with the St. Leonard's development..

2.5 BUILDINGS WITHIN THE SITE

- 2.5.1 The row of buildings, first named Archery Villas, referred to in the application as 'The Terrace,' within the proposed development site was opposite the south eastern edge of the original Archery Ground. The terrace was listed Grade 2 in 1976 as a single entry in the list. Alteration to roadways when the College was built moved it out of the circulation of the street and into the College's curtilage.

Archaeology South East made a Heritage Asset Assessment of The Terrace in June 2009 as part of the documentation for the planning application but this is more properly a description of the physical form of the buildings, than analysis of their history and development and is no real assessment of the characteristics which create their special architectural and historic interest.

The two authors of that Heritage Asset Assessment are well qualified building archaeologists, each with particular research interests in the vernacular architecture of the immediate post-Medieval period, but this shows no particular expertise to assessment of significance of the buildings as Heritage Assets.

The buildings' date of c.1850-60 make them probably Decimus Burton's work. The interiors appear to have been ravaged by conversion as part of the College development but the exterior remains substantially original.

The principal significance of these listed buildings is authorship by an architect of note and as being a contributory elements to the layout and planning of the St. Leonard's development.

- 2.5.2 Two late 19thC buildings and their gardens were on the south west boundary of the Archery Ground before they were compulsorily purchased for building of the College: Rosemount and Highlands House.

Rosemount was a house by James Burton, a handsome villa with gables of differentiated height and steeper pitch than the shallow angles of Neo-Classicism. The gables had fret-cut barge boards, the windows generally with square hood moulds but some upper windows as small Gothic lancets. This was Gothic Revival in the Neoclassical manner, an attractive and eclectic

16thC mix. The building was listed Grade 2 but was demolished for the College build.

- 2.5.3 *"It was the destruction of the Archery Ground by the building of a vast 1960s slab block for Hastings College, together with plans for the further demolition of historic buildings [including Rosemount], which brought about the original conservation outcry in the late 1960s, triggering the formation of the Burtons' St. Leonard's Society and bringing down Sir John Summerson and the Architectural Review to trumpet their dismay."* [Nathaniels E *ibid*]

Notwithstanding their trumpeting, the new College buildings were built and historic buildings demolished, but shortly afterwards appreciation of the significance of the Burtons' development resulted in the designation of the Burtons' St. Leonard's Conservation Area, one of the Borough's first two.

- 2.5.4 Buildings of the 1960s for Hastings College have been much criticised and little praised. The main building, as Nathaniels describes, is a 'slab' block. Smaller buildings on the southern quadrant of Archery Road are of more domestic scale but of alien materials and massing without reference of scale to the road's established building pattern.

There is little that can be said in favour of the principal College block. A rectangular plan without curves to relate it to its site nor its pre-existing neighbours, nor modeling and sympathetic massing. It was sited with no reference to the boundaries or character of the Archery Ground. It has no architectural detail sympathetic to its context and is built of commonplace materials that are alien to the surrounding area. Its expedient construction has not endured and it has not mellowed into its site.

- 2.5.5 The smaller buildings on the north side of West Hill Road, separated from the Archery Ground by The Terrace, are astylar, using the ubiquitous weatherboarding and concrete blockwork of their time, but not their locality. In a maritime environment these materials have not aged into mellowness and any architectural power that the building design attempts was diluted by inappropriate bent steelwork screens and balustrades that ape wrought ironwork.

These smaller buildings are neither particularly bad, nor good. At best they make a neutral contribution to the conservation area.

- 2.5.6 Each generation finds the buildings of its parents' generation less attractive than its own, but prefers those of its grandparents' generation. Thus 1960s architecture is generally unfashionable and unloved. However, were such a building as the College block and its ancillary buildings to be proposed for the site now, it would not meet any of the design advice put out by the Commission for the Built Environment (CABE) [*Building for Life: Evaluating housing proposals step by step*: CABE: 2008: URL: <http://www.cabe.org.uk/files/evaluating-housing-proposals-step-by-step.pdf>: The national standard for well-designed homes and neighbourhoods]. Nor would it meet the criteria for new design in the historic environment, as set out in the Practice Guide to PPS5. It would thus indubitably be refused planning permission.

2.6 BUILDINGS WITHIN THE SITE'S SETTING

- 2.6.1 Buildings surrounding the Archery Ground are not universally of the Burtons' authorship, although many are. Collectively they show the evolution of 19thC domestic architecture from Neoclassical to Gothic Revival and to nascent Arts & Crafts (notably Bannow designed 1877/79 by Norman Shaw for the Rev John Tottenham White). Several of these buildings are listed and some are on the Borough Council's local list. Most of those not listed would nonetheless be considered as Heritage Assets for their contribution to the Conservation area.

Particularly significant in their relationship to the Archery Ground are The Highlands to the northwest of the Ground and the villas of The Mount to the northeast.

The Highlands of 1874 is in splendid Scots Baronial style (like *Burnham Wood* come to St. Leonard's not *Dunsinane*) representing the late Victorian affection for all things Scottish, echoing Queen Victoria's love of the Caledonian. The pointed turret roof and steep crow-step gables provide a vigorous skyline above the tree screen at the back of the Archery Ground.

- 2.6.2 Decimus Burton's semi-detached villas built around The Mount's tightly curving crescent off Quarry Road, similarly define the skyline from the Archery Ground.
- 2.6.3 In addition to those buildings and those that form the first development of Burtons' St. Leonard's, are buildings of the 20thC. Archery Court flats from the second half of the 20thC on the western quadrant of Archery Road share the absence of style of their contemporaries in the College buildings.
- 2.6.4 The late 20thC flats of Quarry House has been suggested as creating a more modern context for the Burtons' St. Leonard's Conservation Area. Whether or not it is a good example of 20thC housing is irrelevant to whether or not it creates context for new building, since its design intentionally counterpoints the character of the conservation area. It is often acceptable for new buildings to contrast and counterpoint historic buildings, but new building should not dominate the historic context and therefore it does not provide changed context for further building in either conservation area.

2.7 SETTING OF THE SITE

The importance of understanding and responding to the setting of a Heritage Asset is stressed in PPS5, paragraph 115 pointing out that *Setting will, therefore, generally be more extensive than curtilage and its perceived extent may change as an asset and its surroundings evolve or as understanding of the asset improves.*

The setting of the Archery Ground goes beyond the conservation area in which it sits to the adjacent conservation area and to be part of the setting of neighbouring Heritage Assets.

2.8 SITE CONTEXT

Prior to assessing the impact that the proposed new development would have on the site and on two Conservation areas, it is appropriate to consider

whether the College buildings have had an effect in creating context to inform subsequent rebuilding.

- 2.8.1 That the site is part of the West St. Leonard's Conservation Area rather than the Burtons' St. Leonard's Conservation Area may be seen as a cruel irony. The piece of land was an intrinsic part of the Burtons' plan but was excluded from the conservation area designated following its and only given any conservation status when the West St. Leonard's Conservation Area was designated later. This is perverse and it would be equally perverse if decisions on planning permission for this site were to be made on the basis of the somewhat different character (and possibly lower significance) of the West St. Leonard's Conservation Area.
- 2.8.2 The purchase of the Archery Ground and the construction of the new buildings, is within living memory, as were the positive outcomes of *the original conservation outcry in the late 1960s* [Nathaniels E *ibid*] the formation of the Burton's St. Leonard's Society and the designation of the Burtons' St. Leonard's Conservation Area. In that context it would be credible to consider that the short term appropriation of the open ground should be reversed and the site revert to the open land that had been an intrinsic part of the matured plan for Burtons' St. Leonard's.

However political and economic imperatives often take a heavy toll on the historic environment, particularly if socially desirable outcomes, the creation of funds for use elsewhere, are sought. In that context redevelopment of the no longer virgin site might be considered appropriate.

But the shortcomings of the 1960s development do not create a credible context nor decent precedent for redevelopment. Rather, any new development should respond to the context of what was the pre-development site and its surroundings. It should respect the various significances of the site and seek to enhance the two adjoining conservation areas.

The College buildings were temporary squatters on the site, but replacements in residential use will, by the nature of that use, have the presumption of endurance, so they have to be got right.

3 IMPACT ASSESSMENT OF PROPOSED NEW DEVELOPMENT

3.1 Paragraph 80 of the Practice Guide to PPS5 says that *Policies HE7.5, HE9.5 and HE10 require attention to the extent to which the design of new development contributes positively to the character, distinctiveness and significance of the historic environment. A successful scheme will be one whose design has taken account of the following characteristics of the surroundings, where appropriate:*

1. *The significance of nearby assets and the contribution of their setting.*
2. *The general character and distinctiveness of the local buildings, spaces, public realm and the landscape.*
3. *Landmarks and other features that are key to a sense of place.*
4. *The diversity or uniformity in style, construction, materials, detailing, decoration and period of existing buildings and spaces.*
5. *The topography.*
6. *Views into and from the site and its surroundings.*
7. *Green landscaping.*
8. *The current and historic uses in the area and the urban grain.*

Although the Design & Access Statement refers to several of these heads it appears to be as justification for the developed design rather than their being generators of the design.

Principally, the proposed new development does not respect the *significance of nearby assets and the contribution of their setting.*

This disrespect has three principal aspects:

1. the disposition of buildings and hard landscape in relationship to site boundaries and neighbouring buildings
2. insensitivity to the historic qualities of the site and its surroundings, and the further loss of historic elements and characteristics that define the site
and
3. the quality of the architecture of the proposed new buildings.

3.2 DISPOSITION OF BUILDINGS HARD LANDSCAPE IN RELATIONSHIP TO SITE BOUNDARIES AND NEIGHBOURING BUILDINGS

3.2.1 As discussed above, a significant characteristic of the St. Leonard's development was the evolution of planning from James Burton's formality to Decimus Burton's informal and picturesque response to the topography, in a curving road pattern and non-orthogonal juxtaposition of buildings.

The disposition of the proposed buildings is orthogonal, arbitrarily relating to the created grid of the college building and arbitrarily parallel to the villas on the south side of The Mount, but with their grain running at right angles. This has no relationship to site boundaries or contours.

This arbitrary orthogonality is reinforced by the large rectangular areas of hard surfaces for car parking. Had the original grid pattern of James Burton's first plans for St. Leonard's been able to be developed, large rectangular areas might have been in context. However in Decimus Burton's more

appropriate response to the land, a site geometry of curves would be more appropriate.

Inevitably creation of large rectangular areas, if they are not to have substantial cross-falls, also imposes terracing onto the sloping contours that were the original character of the site.

- 3.2.2 The disposition of the proposed individual buildings is predicated on the architects' assessment that there is a single defining building line crossing the site from south east to north west. Little credible argument is put forward to support a single building line and it is perverse that the proposed disposition of buildings on the site is set to an arbitrary line across the site without reference to its defining perimeter lines.
- 3.2.3 The residual piece of open space in the centre of the proposed redevelopment is mean in size and all the more sad for being of abstract polygonal shape without James Burton's formality or Decimus Burton's informality and further for being parking space with no amenity value.
- 3.2.4 Opposite The Terrace, the proposed new range of buildings curves as a nod to Decimus, but not a genuflection, since it does not echo the subtle curve of the listed buildings' façade, nor follow a contour defined by the shallow concavity of the site. This slight piece of whimsy is the only curve in an otherwise rectilinear composition.
- 3.2.4 It is at the northern end of the site, opposite The Highlands, where disposition of the new buildings seems most jammed into the site area, regardless of its topography. This is significant in the second area of disrespect.

3.3 INSENSITIVITY TO HISTORIC QUALITIES OF SITE AND SURROUNDINGS AND LOSS OF HISTORIC ELEMENTS AND CHARACTERISTICS

- 3.3.1 The impact of the existing College building is mitigated by the dense tree screen that surrounds the 'glen' that is the remnant of the quarry. This tree screen, if not individual specimens, is ancient, being seen in the birds eye engraving of 1837 as existing before development.

The proposed substantial reduction of the tree screen is as effective in damage to the character of the conservation area as would be its complete felling. Any replanting on the narrow strip of retained land at the back of the pavement would take a very long time to match the maturity of the current tree screen and could not match its effect in creating the picturesque quality of the 'glen.'

The 'glen' as has been noted has significance as earth working related to the physical development of Burtons' St. Leonard's. The attractive birds eye sketches in the Design & Access Statement clearly show the form of the former quarry. Infilling it with terraced decks for car parking and the large blocks of flats surrounded by retaining walls will destroy its character irrevocably. It would be another irony if having survived in spite of the intrusion of the College buildings into the site, this feature and its surviving tree screen were to be lost in a new development that purports to have been designed with sympathy to the two conservation areas.

3.3.2 Paragraph 1.2 of the Design & Access Statement describes that the site *borders on Burton's [sic] St Leonards...* without note that the Archery Ground was an intrinsic part of the developed plan for the new town. There are a number of other elementary errors regarding buildings within and around the site, with misapprehension of their history and the context that creates. This indicates a lack of research, but perhaps suggests a lack of sensitivity to the historic environment of the two conservation areas.

This is crucial to the third area of disrespect.

3.4 ARCHITECTURAL QUALITY OF THE PROPOSED NEW BUILDINGS

3.4.1 This third area of disrespect to the character of the site and the two conservation areas is in the architecture of the proposed buildings.

3.4.2 Around 25 BC Marcus Vitruvius Pollio wrote in *De Architectura* that buildings should have *firmitas, utilitas* and *venustas*: firmness, commodity and delight (commodity being taken as making the building and its elements the right size). He also wrote that building elements should be logically ordered by their importance and their degree of ornamentation (*decorum*) should be appropriate to the prominence of the building and to the prominence of ornamented parts within the building.

Although *Vitruvius'* ideas were propounded by Renaissance masters such as Andrea Palladio and Inigo Jones and intrinsic to early 19thC Neo-Classicism, they were considered equally valid in the 20thC by that century's pre-eminent architect, Le Corbusier. They are not just ideas for making old buildings. The Design Quality Indicator (DQI) a toolkit to measure the design quality of buildings was developed by the Construction Industry Council in 1999 and launched as an online resource for the UK Construction Industry in 2003. The toolkit uses the criteria of *firmitas, utilitas* and *venustas*.

3.4.3 There is no reason to doubt the firmness of the proposed buildings' structures and the massive retaining walls necessary because of excavation into the site perimeter. However there is a vagueness in the description of external materials that is a matter of concern for their longevity as well as for their appropriateness to established palette of materials in the two adjacent conservation areas.

3.4.3.1 The STO render system is an excellent modern building system, widely used in Continental Europe and increasingly in this country. However it does not have appearance to match the painted stucco ubiquitous in Burtons' St. Leonard's. The self-coloured render is texturally and chromatically quite different to painted stucco. Also the application of the reinforced render to flat expanded polystyrene slab substrates is inimical to the expressed detail (*decorum*) that punctuates and clarifies the parts of the facades of both the Burtons' Neoclassical early buildings and those later, which are Gothic and Tudor inspired.

3.4.3.2 The type and colour of brickwork and mortar is undefined. Brickwork is not ubiquitous in the two conservation areas and where it is seen as an attractive building element (as opposed to coarse and mean brickwork necessary for rebuilding after WW2 bomb damage) it is of hand-made bricks laid Flemish bond in lime mortar and having mellowed by weathering. Modern machine made bricks (unless the development has an adequate budget for good

quality brick) laid stretcher bond in cement mortar will not match the mature quietness of original brickwork.

- 3.4.3.3 Coarse stonework, presumably intended to be rough-hewn local sandstone, will be difficult to procure since the quarry from which it was won is to be built upon. The detailing of rough stone work is not easy and its requirements are not generally known within the modern architectural profession or the construction industry. It is a material that relies on its mass for both its stability and its integrity since it is fugitive to weather erosion if not correctly used. Detailing of quoins at corners and openings and the mix of harder masoned stone at key details is a strong visual element that is not evident on the applicant's drawings.
- 3.4.3.4 Flat metal panels and standing seam metal sheeting can produce elegant architecture, especially if well detailed and with the elements in good proportion. However there is insufficient detail on the application drawings to verify whether it will be well detailed and proportioned, nor whether it will be of a type that will weather suitably in a substantially maritime environment, be sufficiently robust to withstand the increased wind-loading in coastal areas, and have longevity appropriate to the scheme's sustainability aspirations.
- 3.4.3.5 The Design & Access Statement says that polyester powder coated aluminium windows will be to the manufacturer's details. This suggests that the architects will have little control over the detail and important elements such as section sizes of members and their effect on the elevational pattern of fenestration are unresolved.
- 3.4.3.6 Comments made about brickwork are similarly appropriate to the selected areas where timber windows are proposed. There is no information whether these will be purpose-made painted windows of traditional type or proprietary products. Again there must be concerns about longevity (and the fear of ill-controlled replacement with pvc) and clumsy fenestrational pattern.
- 3.4.3.7 Of roofs the undefined mixture of natural and reconstituted slates will have the effect that the natural material will highlight the different visual quality of the manufactured.

Standing seam metal roofing, allowing a shallow pitch that James Burton would have envied, may be acceptable, subject to aspects of actual material and its ultimately weathered colour or if coated its applied colour, and careful detailing. However the sketch which shows such sheeting, used as an overhang detail at the eaves of a slated roof, does not echo any traditional form except for the flimsy and *ad hoc* coverings to balconies (sometimes where original fabric has been lost) on the sea-front. These are details which are regrettably ubiquitous but are not good models for new buildings in a Conservation Area.

- 3.4.3.8 Architect's sketches of individual buildings are always beguiling, especially to those who can't draw, but those in the Design & Access Statement (apparently produced with *Sketchup* computer modelling software) are simplified so that elevation planes and mass appear to have a strength that poor quality or inappropriate materials and their consequent detailing may not achieve.

- 3.4.3.9 In the matter of *utilitas* there have been expressions of doubt that the proposed mix of flats and houses is not appropriate for the site. This has an impact on the relative mass of the different components of the mix and thus its appearance.

However, the subject of the development mix is a different issue from the Assessment of Significance and the Impact Assessment that STAG have asked me to make.

- 3.4.4 Of individual buildings the proposed apartment block at the north end of the site is the most worrying. Paragraph 2.4 of the Design & Access Statement avers that it should be prominent and create a focal point from Highlands Gardens. Prominence would be to dominate the site and intrude into established views as an unwelcome focal point. The current College building is prominent, and by virtue of scale, obscures the outline of the site, both as sky line and at ground level. The proposed new apartment building would repeat this rude attention seeking.

It is possible for new buildings to sit into the historic environment without pretension and without self-effacement, but to do so the new buildings should not seek to dominate established buildings of quality. The scale of the new apartment building endeavours to match the scale of The Highlands and thus steal the thunder of an established focal point.

The architecture of the new apartment building does not have architectural features derived from the locality. It is astylar. This lack of referential features is also seen in elevational patterning where fenestration does not match the relative ratios of solid to void of the established buildings of the conservation area, nor hierarchies of scale.

- 3.4.5 Individual houses within the oval of the Archery Ground are similarly astylar and would be appropriate in a setting without the historical context that has been demonstrated. They are without ugliness but do not have *venustas* or relevance to their context. For a prominent site in a conservation area something better is needed.
- 3.4.6 On West Hill Road the architectural offer is braver, as a 'signature' building to master the corner with Quarry Hill and presumably in order to make up the drabness of a part of the conservation area that has been ill treated by rebuilding in the third quarter of the 20thC: not a good setting for the Burton Memorial.

The proposed building has a modern maritime appearance harking at the *Art Deco* of Miami Beach and *Modern Movement* buildings at Frinton by Oliver Hill, but more locally echoing the new buildings of Brighton's Library Quarter, albeit that those are larger scale public buildings. Given all the concerns relating to materials and detailing expressed above, it could be an enjoyable building on the sea-front but it is less certain that its maritime language will be so appropriate away from the shore and in a site less urban and flat than the Library Quarter.

- 3.4.7 The matter of architectural language is appropriate to consider in assessing the impact of these proposed new buildings on the two adjacent conservation areas. James Burton and Decimus in his early career, were fluent in the language of Neoclassical architecture. This architecture had its grammar,

syntax and vocabulary represented by the various orders and details, sometimes used loudly and with vigour, sometimes quietly. Fluency of language allowed great architectural expression and allowed that expression to be understood by those who viewed it.

Decimus went on to a fluency in architectural languages that went beyond Neoclassical to encompass the revival styles of Gothic and Tudor and had the wit to sprinkle a *bon mot* from another language into a building with great effect.

The Modern Movement of the early 20thC intended to do away with historically referenced style but in so doing created an architectural language of its own. Subsequent movements in architecture, including Post-Modernism eventually became coherent architectural languages.

Whilst the architectural language of new building on West Hill Road has recognisable precedents, there is a lack of clarity in use of architectural language elsewhere in the proposed development. It would be well mannered to regard the architectural languages of the conservation areas as the *lingua franca* that should be the generator of new architectural expression. There would be also be scope for a counterpointed language if it did not attempt to shout down the historic language of the conservation areas. However the architectural offer of this application appears to be self-absorbed and pays only lip service to the character of the area.

4 CONCLUDING COMMENTARY

Knocking down one group of unsatisfactory buildings to replace them with another, unsatisfactory in different respects, does not preserve and enhance the West St. Leonard's Conservation Area. This development will have a negative impact on the historic environment of that conservation area and on The Burtons' St. Leonard's Conservation Area.

Substantial amendments would be necessary for the planning application to be acceptable. The necessary amendments are such that they would result in a different scheme. There is no statutory definition of a non-material alteration but the following definition (from the Planning Portal, the Government's online planning and building regulations resource for England and Wales [<http://www.planningportal.gov.uk/wps/portal/portalhome>]) is likely to apply: "*A proposed amendment is a minor and insignificant variation in a detail or details which does not raise any new issues which would warrant the submission of a fresh planning application.*" On this basis it would appear that the planning application should be withdrawn for substantial amendment or refused because it is unacceptable.

The Planning and Compulsory Purchase Act 2004 requires determination of planning applications to be made in accordance with the provisions of the Local Development Framework, unless material considerations indicate otherwise. Notwithstanding public policy advantages from development of this site and the other College site in West St Leonard's, in providing contributory cash for development of the new College in Hastings, there are no reasons why the application should not be decided with due consideration of its impact on Heritage Assets within and adjacent to the site and to the two conservation areas.

The Design & Access Statement refers to pre-application consultation and suggests that the applicants consider that the scheme as proposed has been developed with such adequate consultation as to be 'agreed.' That the application has not been greeted with open arms and has not been put to committee for a decision fifteen months after application suggests that it is far from agreed. And that is at it should be. This scheme is not good enough for this important site.

I must agree with architectural historian Gavin Stamp (writing under the pseudonym *Pilotti* in *Private Eye*, this is "*a monstrous overdevelopment of the site and entirely alien to the character of St Leonards*".

Stephen Gray MSc Dip Arch IHBC RIBA

2011-02-17

APPENDIX

Stephen Gray Dip Arch MSc IHBC RIBA is a chartered architect in practice for almost 40 years.

Previously a Principal Architect with the Department of the Environment, he undertook projects for the Directorate of Ancient Monuments and Historic Buildings (the precursor to English Heritage). For the last 17 years, as a director of Weldon Walshe, he has specialised in projects involving listed buildings and conservation areas. These have included historic houses designed by Colin Campbell, Robert Adam, James Wyatt, C F A Voysey and Norman Shaw and numerous buildings in Central London by the master builder Thomas Cubitt and the four principal domestic architects of the early 19thC, Sir John Soane, John Nash, George Basevi and Decimus Burton.

In addition to projects for conservation of historic buildings he has been heritage consultant for new interventions into the historic environment by architects such as Sir Michael Hopkins and Horden Cherry Lee.

His Master of Science degree is in Historic Building Conservation. He is a member of the Institute of Historic Building Conservation and an invited member of the Institute of Structural Engineers History Study Forum. He is a consultant to the National Trust, the IHBC's nominated board member of the Covent Garden Area Trust and has undertaken *pro bono* work on planning and the historic environment for local authorities and community associations. He has been an occasional visiting lecturer to the School of Conservation Science of Bournemouth University.