



Birnbeck
Conservation
Group

SUPPLEMENTARY OBJECTION FROM BIRNBECK CONSERVATION GROUP (BCG)

TO PLANNING APPLICATION 21/P/2682/FUL

– REDEVELOPMENT OF 55 - 57 BIRNBECK ROAD - FORMER ROYAL PIER HOTEL SITE

8 March 2022

This is supplementary to BCG's 22 December 2021 memorandum of Objection ('Objection'), and follows the February 2022 publication of 3 documents on the NSC portal:-

- A. Visuals & Views posted 11.2.2022
- B. Accompanying document from the Applicant's Architect posted 11.2.2022
- C. Design Review Panel – Design Review posted 23.2.2022

Having studied these documents, this letter is simply to record that we have found nothing in documents A and B which offers any material change vis a vis the design issues which most concern us - that is the height of the building, and secondly its external appearance¹.

As we said in our Objection (Introduction, Page 3): "the superficial external changes which are mentioned [i.e. as compared with the pre-application] we consider to be *de minimis*"; We see nothing in documents A and B to change that view.

In response to requests from a number of Consultees and no doubt the local planning authority itself, the Applicant provided (Document A) the graphical images of the proposed building in its landscape setting.

Having reviewed Document A, we can all perhaps surmise why these images were not originally supplied by the Applicant with its Application, for they provide damning confirmation of the overwhelming harm this development would cause to the conservation area, its heritage setting and public visual amenity at key viewpoints on all sides of the development.

The Civic Society have produced a powerful analysis of this document in their second objection letter to the Council posted on the planning portal on 21 February with which we concur.

Document B seeks to justify the proposed development with the same desperate and tired arguments used in the earlier Application documents.

¹ We have other areas of concerns as well, in relation to the economic/social benefits the applicant tries to claim for its scheme, and these are addressed in our Objection; However the focus of the above listed documents, and therefore of these observations, is upon design.

For example at 3.2 (Massing) the Applicant states: *"the proposed massing allows breathing space between the landscaping tiering down from Prince Consort Gardens on the right hand side and the continuation of the coastal development on the left. Enticing one to continue the journey towards the pier and landscape beyond"*.

Here this grossly oversized building is ludicrously described as providing a "breathing space" that will somehow "entice" people to journey towards the pier and beyond.

We suggest that what would entice people to explore further toward the pier (if indeed they would need any incentive given a regenerated Birnbeck Pier) is a development which **ensures that the grand sweep of the seafront develops in a positive manner** (as per the Seafront Character Area Appraisal), *not a building that brings that sweep to a shuddering halt by dint of its height and appearance*². We hold that the sweep of the bay can only be credibly maintained, let alone positively developed, by a building which adopts the height of the former hotel as the starting point of its design. The area was built in a scale and proportion which has been largely preserved together for some 150 years - only disrupted by the burning down of the hotel and the gross neglect of the pier.

Subsequently on 23 February the Design Review Panel's conclusions were published (Document C), following a site meeting on 3 February.

Despite the fact you would hardly realise it from reading the Applicant's commentary in Document B, the clear rejection by the Design Review Panel of the application proposal on design grounds is evident in a series of highly critical statements from the Panel, including:

"Overall, the proposal needs a clearer architectural rationale"... "The proposal still appeared to be too bulky" "The Panel thought the eastern elevation was

unsympathetic in scale to its neighbours, as demonstrated in the visuals....

"Generally, there is still a need to understand the historic context in more depth and consider further the response of the building in three dimensions and how it complements the heritage context."

Our principal design objection remains that **the building is too high, and should be no higher than the former hotel building lost to fire**. The current Application proposes the wrong building in the wrong place³.

Further, our 22 December 2021 Objection remains as stated on all the grounds set out in that document.

This Application should be decisively refused.

² And here we also find ourselves in agreement with the Civic Society's Comment posted on the planning portal on 23 February 2022.

³ The current design has been described as 'more Benidorm than Birnbeck'; This is not a pejorative statement, simply an illustration of the ill-suitedness of the proposal to this location.