

**PLANNING COMMITTEE REPORT**  
**Tuesday 18 August 2020**

**CHAIRMAN: Cllr Mike Haines**



<b>APPLICATION FOR CONSIDERATION:</b>	<b>DAWLISH - 20/00922/LBC - Dawlish Railway Station , Station Road - Works to include reconstruction of existing timber downside station platform, new accessible passenger footbridge, alterations to existing platforms surface resulting in minor changes to door openings of downside station building, refurbishment of passenger waiting room and refurbishment and repairs to the fabric of the station building on seaward elevation all in association with Dawlish Sea Wall Stage 2 project</b>	
<b>APPLICANT:</b>	<b>Mr Colin Field</b>	
<b>CASE OFFICER</b>	<b>Helen Addison</b>	
<b>WARD MEMBERS:</b>	<b>Cllr Linda Goodman-Bradbury Cllr Linda Petherick Cllr Martin Wrigley</b>	<b>Dawlish North East</b>
<b>VIEW PLANNING FILE:</b>	<a href="https://www.teignbridge.gov.uk/planning/forms/planning-application-details/?Type=Application&amp;Refval=20/00922/LBC&amp;MN">https://www.teignbridge.gov.uk/planning/forms/planning-application-details/?Type=Application&amp;Refval=20/00922/LBC&amp;MN</a>	





20/00922/LBC - Dawlish Railway Station,  
 Station Road,  
 Dawlish,  
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## 1. REASON FOR REPORT

The linked Prior Approval application (20/00933/NPA) has regional significance and is appropriate to be determined by planning committee. This application should be determined at the same time as it sits alongside the prior approval application and it is therefore included on the agenda for the planning committee.

## 2. RECOMMENDATION

Subject to receipt of satisfactory information (to be determined by the Business Manager – Strategic Place in consultation with the Chair and Vice-Chair of Planning Committee) relating to:

1. The external appearance of the accessible footbridge,
2. The method of joining the new sea wall to the station building and
3. Confirmation of the extent of restoration works to the downside platform building;

LISTED BUILDING CONSENT BE GRANTED subject to but not limited to conditions addressing the following matters, the precise wording of the conditions to be determined under delegated authority by the Business Manager – Strategic Place:

- 1) 3 year time period for implementation
- 2) Plans list
- 3) Details of materials to be used for platform resurfacing
- 4) Details of new lighting, CCTV and public information installations
- 5) Details of type of render and colour to the seaward elevation of the station building be agreed
- 6) Submission of a Building Surveyors Report on the downside station building to include an assessment of the stability of the building when piling adjacent, which should inform a method statement for full repair predicated on *Conservation Works Phased Study to the Downside Building* set out in the HS (pp.95-103) to include a full specification and drawings of works to be carried out . A timescale for the implementation of the works to be agreed.
- 7) Details of new roof canopy
- 8) Details of imprint of station building in sea wall
- 9) Details of how gas lamp standards would be re-used

### **3. DESCRIPTION**

#### **Site description**

- 3.1 Dawlish Railway station is a Grade II Listed Building. It is situated on the east side of Station road and abuts the promenade adjacent to the beach. The promenade forms part of the South West coastal path. There is an associated car park to the north. Beyond the car park are large sandstone cliffs.
- 3.2 The station building was completed in 1875 and replaced a former wooden building that burnt down. It is of an Italianate styled design and consists of upside and downside buildings with attached platforms, linked by a footbridge. The upside building is the entrance to the station and has a grand façade facing the town. There are a number of interesting features which include attractive decorative supports on the town side entrance canopy, the grand appearance of the booking office with a lofty and decorated ceiling, the fortified appearance of the lower ground floor facing the sea, the northern part of the downside platform which is cantilevered over the adjoining promenade and the southern part of the platform which is supported on reused gas standard columns that were installed in the 1940s.
- 3.3 The rooms in the downside building are currently unused and are in a poor state of repair. A number of the windows facing the beach are protected from the elements by Perspex sheets. Due to its siting there are extensive sea views from the platforms. The existing footbridge that links both platforms that was replaced in 2013. An escorted barrow crossing is used for travellers where the steps are inaccessible. The platforms have a modern asphalt surface. The canopy roofs were installed in 1961.
- 3.4 The listing description was updated by Historic England in 2018, confirming its special interest.

#### **Detailed proposals**

- 3.5 This application is for listed building consent for works to the Grade II listed station as part of Network Rail's coastal resilience proposal to protect the railway track and station from overtopping by the sea, and for construction of a new accessible bridge within the curtilage of the station. This application sits alongside application reference 20/00933NPA which is for Prior Approval for development along the stretch of railway line between the Colonnades and Coastguards breakwaters.
- 3.6 The application site is smaller than for the prior approval application as it relates only to physical works to the building and within its curtilage.

3.7 The works that are the subject of this application are:

- Reconstruction of Dawlish station seaward platform with a reduced stepping distance between the train and the platform with new tactile paving for visually impaired. Increase in width of the platform and its rise in height. This includes removal of the cantilevered platform north of the station and the gas light standards supporting the southern part of the platform.
- Alterations to door openings on the downside station building as a result of resurfacing (albeit the doors to be reused).
- Phased conservation works to include repairs to the fabric of the building and bringing the platform waiting room back into use.
- Minor alteration to the landward side platform to include tactile paving and resurfacing.
- Renewal of existing lighting and provision of lighting on the northern half of the seaward platform, cctv and public announcement columns.
- Construction of promenade and sea wall adjacent to seaward elevation of the building including a secondary wall between the platform and the promenade.
- A new, accessible station footbridge with lifts with new steps.
- New ramp into the station carpark from the upside (town) platform and alteration to steps.

### **Key issues/material considerations**

3.8 In terms of policy and principle, section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on Local Planning Authorities to give considerable weight and importance to the desirability of preserving listed buildings and any features of special architectural or historic interest and their settings.

3.9 Paragraphs 193 to 195 in the NPPF translate this statutory position to national policy.

3.10 Policy EN5 in the Teignbridge Local Plan 2013-33 is relevant to the application. This requires consideration of development proposals to take account of the significance, character, setting and local distinctiveness of any affected heritage asset. New development should respond positively to the character and distinctiveness of the area and where appropriate include proposals for enhancement of the historic environment.

3.11 The key issue is the impact of the proposed alterations set out above on the historic character of the building and its setting. Each matter will be addressed in turn;

#### **a) Reconstruction of Dawlish station seaward platform**

3.12 The loss of the cantilevered northern end of the platform would change the character of the station when viewed from the promenade and the beach. This is a distinctive feature which although extended in the 1930s, contributes to the historic character of the station. It is evidentially much repaired and very little of the original fabric survives. The exposure of this part of the platform to damage from storm events provides considerable justification for its replacement. The burden of continued maintenance and having a sometimes unusable platform impacts on the operational reliability of the railway and station.

- 3.13 The loss of the former gas standard columns from the southern end of the platform would similarly have a harmful effect on the historic character of the station. Whilst the cantilevered platform referred to above is not included within the listed area of the station, this part of the platform is, which adds weight to its importance in heritage terms.
- 3.14 Historic England advise that in their view the proposed re-use of the columns should reflect the former structural role as a group. Ideally they suggest that they could be incorporated into the section of the wall maybe as breaks within the panels. Alternatively they suggest consideration should be given to them forming a piece of art as part of the heritage trail.
- 3.15 The suggestion of incorporating the columns into the sea wall would not be practical as this would undermine the structural integrity of the wall and therefore its performance in defending the railway from wave overtopping in storm events. In addition it would increase exposure of the columns to the elements which would inevitably lead to their deterioration.
- 3.16 There are twelve columns which would take up considerable space if they were formed into an art installation particularly considering the space needed around any installation to appreciate it. There is not a large enough area within the development for such an installation. Therefore it is concluded that it would not be practicable to implement HE's suggestions. In this case it is considered that the most expedient solution would be to reuse them throughout the station and car park as proposed by NR. T
- 3.17 The loss of the gas standards would be mitigated to an extent by the proposal to reuse them as part of the development. In order to secure this it is appropriate to condition submission of a detailed schedule of re-use. The Town Council and Dawlish Local History Society have requested any unused posts be given to the local community which NR has agreed to.
- 3.18 The principle of raising platform 1 (downside) by up to 200mm would impact on the historic character of the station. The change in platform level would necessitate removal of the first step of the staircase leading to the footbridge. It would also mean that there would be some alteration to original fabric in the downside station building. This is considered in more detail below.
- 3.19 The total loss of the existing platform would have a notable impact on the historic character of the station. These alterations to the platform are intrinsically linked to the construction of the new sea wall and high level promenade which are discussed below.

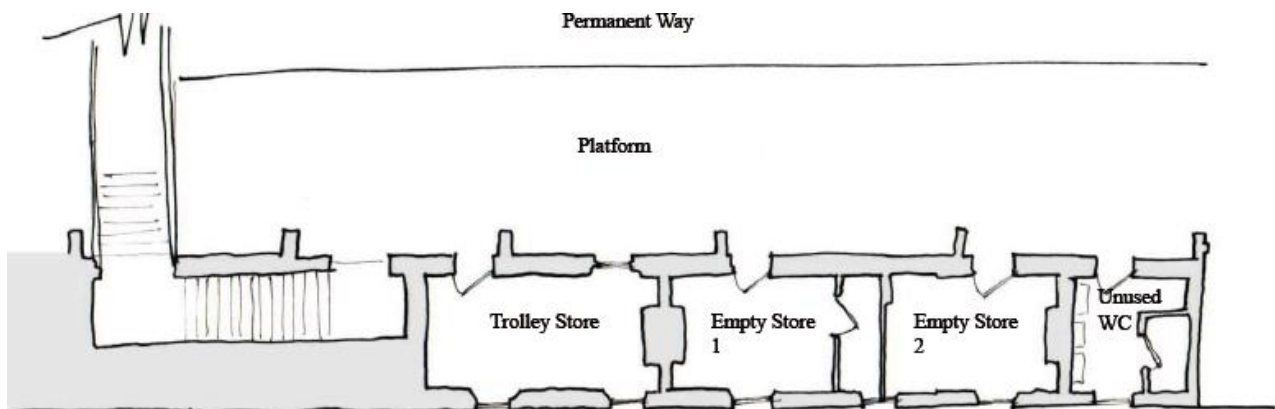
**b) Alterations to door openings on the downside station building as a result of resurfacing**

- 3.20 The changes to the level of platform 1 (downside) would necessitate raising the level of four doors along the platform. This would be achieved by replacing the existing header above the doors with a smaller header, which would allow the re-hanging of the doors within the existing frame at a slightly higher level. The lower part of the existing wooden door frames would be removed with a new door sill formed in red bricks to match existing internal exposed brickwork and rendered/plastered.
- 3.21 The retention of the existing doors which could well be original is welcomed. Subject to the quality of implementation this is considered a sensitive alteration to the building which would minimise impact on its historic character.

**c) Phased conservation works to include repairs to the fabric of the building and bringing the platform waiting room back into use.**

- 3.22 The downside building is in poor condition and has not been used for many years. Historically has been used as;
- A general waiting room
  - A 1<sup>st</sup> class ladies waiting room and toilet
  - A 2<sup>nd</sup> class ladies waiting room and toilet
  - A gentleman's toilet and urinal

An existing floor plan is below;



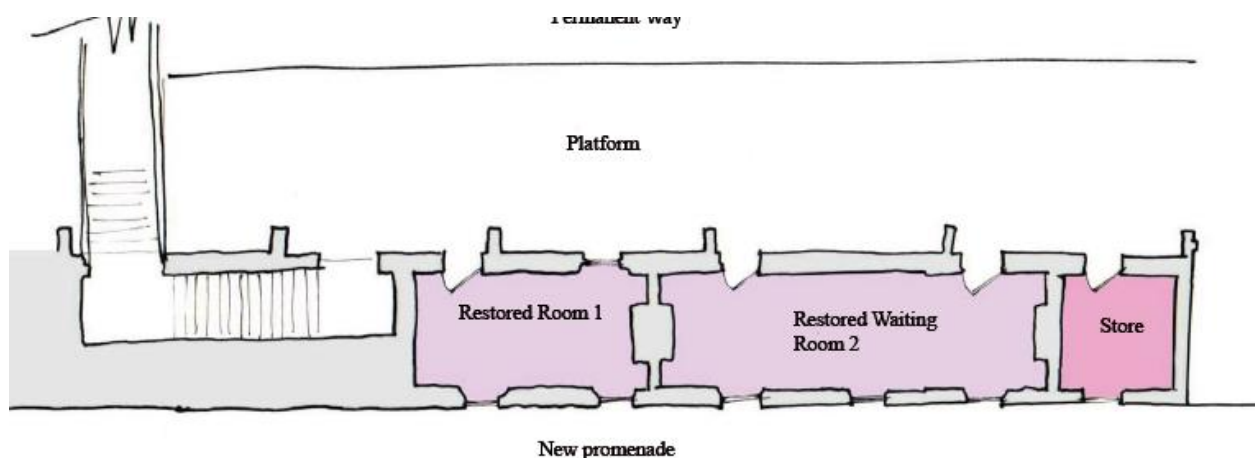


3.23 In Network Rail's (NR) heritage statement three phases for the downside building's conservation are proposed which are;

- Phase One: Weathertight which involves immediate repairs to the exterior of the building including repairs to the walls, roof tiles, flashings, gutterings and structural timbers.
- Phase Two: reinstatement of waiting room. This includes replacing windows to include secondary glazing, remove partition between two central rooms to form one central waiting room. Reinstatement of architectural features and new flooring.
- Phase Three: complete conservation of the downside building which includes repairs and reuse of the two other rooms.

3.24 Externally the render to the seaward elevation would be reinstated.

3.25 In their response to the Council's conservation officer NR have stated the intent of the application is that *at least one waiting room will be brought back into use as part of this project and it is agreed that a full specification for the works to the waiting room, including a condition survey, drawings and scheduled would be required.* This is at odds with the description of proposed works of reinstatement in appendix C of the Heritage Statement which details that all the rooms will be restored and includes this plan:



3.26 It is important that NR confirm that the restoration works extend to all the rooms in the downside building as this is a clear heritage gain that should be secured through the grant of consent. This point is supported by HE in their second consultation response.

3.27 The improvements to the downside building would prevent further deterioration of the building and reinstate historic features. It would also bring the building back into public use which would be a clear public benefit/heritage gain.



3.28 The extent of the works should follow the details set out in Appendix C of the Heritage Statement and will need to be informed by a Building Surveyors Report. Following completion of this a full specification, drawings, schedule of works, method statement and timescale for completion will be need to be submitted and agreed by the Local Planning Authority. The Council's conservation officer has agreed that this can be addressed by condition. There is an urgency to the completion of these works to secure protection to the building.

**d) Minor alteration to the landward side platform to include tactile paving and resurfacing.**

3.29 Platform 2 (upside) would be lowered slightly, but to prevent impact to the main building the platform would have a gradient to it approximately 1:50. As with platform 1 it would be resurfaced with new tactile indicators and copers (which is the paving at the edge of the platform) installed.

3.30 This change would have a negligible impact on the historic character of the station as the platform is surfaced in a modern material and no changes would be needed to the station building.

**e) Renewal of existing lighting, provision of lighting on the northern half of the seaward platform, CCTV and public announcement columns**

3.31 New lighting, cctv and public announcement columns are proposed on the seaward platform as a result of widening and changes to platform level. There are currently modern lighting columns on the platforms. It would be appropriate to condition that the appearance of these is agreed with the LPA. It is considered that these are required for health and safety reasons and there would be a minimal impact on the historic character of the station.

**f) Construction of promenade and sea wall adjacent to seaward elevation of the building including a secondary wall between the platform and the promenade.**

3.32 Although not included in NR's description of works that they have applied for listed building (LB) consent for, because the new sea wall and promenade would be attached to the listed station building that section of the wall and promenade which joins the building would also require the LB consent.

3.33 The proposed sea wall and promenade would obscure the entire lower part of the downside station building. The result of this would be that the shoreward façade of the building would be completely altered and all of its lower level features would be lost. This includes the removal of features that contribute to its significance such as the 1940s gas standard platform supports, the recessed seating alcoves along the promenade and obscuring the blocked off staircase which originally provided an exit from the station. The experience of walking adjacent to the upper level windows would completely change the way in which the building is appreciated and its defensive role from the sea and appearance would be greatly diminished.

- 3.34 The positive aspect of the proposal would be that the building would be protected from future deterioration and the downside building rooms would be restored and brought back into use. This would ensure the longevity of this heritage asset.
- 3.35 Historic England has referred to how ventilation to the external wall of the station will be ensured if the proposed sea wall is constructed. This is to ensure that the proposed works would enable the historic building to continue to breathe and to facilitate the drying out process. They encourage the council to seek further consideration to the approach of the interfacing to confirm that the benefits through the drying out process can be delivered. Further clarification on this point is sought from Network Rail and Members will be updated on this.
- 3.36 Provision of the new sea wall and the secondary wall between the station platform and the promenade would restrict views of the sea from the station platform. Currently there is a timber rail fence along the seaward edge of the platform that affords extensive sea views. The predominantly solid nature of the proposed walls (it is noted that there would be a railing on the upper part) would curtail a considerable extent of views along the coastline. These panoramic views of the coast are an important part of the building's setting as they have formed part of the historic experience of people arriving at the station to visit Dawlish.
- 3.37 Views of the station from the beach would be considerably changed by the extent of the proposed new sea wall.
- 3.38 The Council's conservation officer has advised that *it is inappropriate that the facing of the new sea wall below the station, the area equivalent to an 'elevational-footprint' of the lower-storey building, should use the same concrete panels as elsewhere, with no attempt to acknowledge the loss.* Historic England raised a similar concern.
- 3.39 The conservation officer recommended three options of how this could be addressed. NR have advised that this could be addressed by providing a 3D scan of the existing downside façade imprinted into the new sea wall. Historic England have supported this proposal and commented that it allows for a contextual reference the station. A clearly modern interpretation, the design indicates the former role of the station as part of the defence. It would be appropriate to impose a condition requiring agreement of how this detail will be achieved.

**g) A new, accessible station footbridge with lifts with new steps.**

- 3.40 A new footbridge and passenger lifts would be built to the north of the station building to provide step-free access for rail users. It would be set apart from the main building and would have an open structure (with no canopy) across the top served by angled lift shafts and staircases, both facing south. All structural steel in the bridge would be stainless steel with a bead blasted (matte) finish and the footbridge and steps would have glass balustrades. The exterior would be finished in high quality GRC concrete panels with a textured pattern finish. The steps on the downside platform would have a wave protection wall.

- 3.41 The footbridge would have a modern appearance and would utilise modern materials which would be a distinct contrast to the historic character of the station. It is appropriate that this modern intervention is physically separated from the main building and is clearly distinguishable from the character of the station. The Council's Conservation Officer describes this as allowing both buildings to 'breathe'.
- 3.42 It should be noted that due to its size and height of the proposed footbridge it would obstruct views to the north of the station.
- 3.43 Both Historic England (HE) and the Council's conservation officer have suggested that further consideration could be given to the design. The Council's conservation officer suggests that the polygonal shape of the footbridge platform could be complemented by a slight batter to the outer sides of the lift towers, to echo the angled glacis of the station understorey. HE note that the two uprights squared lift towers form a significant and dominant structure which they consider is further exacerbated by the choice of Patterned Glass Reinforced Concrete (GRC), the hard finish of which will add to the visual dominance of the footbridge. They advise that further consideration should be given to the design of the structure which should aim to address the shape and hard finish of the proposed towers. This could be through the choice of materials, colour and the creation of a greater texture or motif to break up the stark quality of the current design.
- 3.44 NR have provided further explanation of the design of the lift bridge. They advise that a mono pitch could be added to the roof of the lift shafts but this would increase their height. Given the relatively tall height of the proposed bridge in its current form which is significantly taller than the single storey station building this would not be a worthwhile modification.
- 3.45 The choice of materials proposed for the external finish of the bridge is defended by NR as being robust in response to the exposed location next to the sea. There is considerable flexibility in the design and colour of the GRC finish which has the potential to improve the appearance of the bridge. Further input to this opportunity is sought from HE and the Council's conservation officer.
- 3.46 In terms of the impact of the proposed footbridge on the historic character of the station, the bridge would clearly read as a modern intervention to the station building. It is relevant to consider the use of the building as a station means that it has to be adaptable to current operational requirements, and this is the case here. The physical separation from the listed building and the clear distinction in design and external detailing means that it would not intervene into the historic character of the building or harm its setting. It is therefore considered (subject to satisfactory resolution of the external detailing) to impact on the historic character and setting of the station, but to be an acceptable intervention.

**h) New ramp into the station carpark from the upside (town) platform and alteration to steps.**

- 3.47 The proposed new ramp would provide step free access from the station car park to the new accessible lift bridge. The ramp would be located at the side of the new bridge. The existing steps from the car park would be widened. An illustration of these changes is shown below;



These changes would necessitate relocation of the three disabled parking spaces.

- 3.48 These revisions are considered to be relatively minor and would not impact the historic character of the station building.

**Conclusion**

- 3.49 In conclusion, the scale and extent of the proposed development would harm the historic and architectural character of this grade II listed building. It is the Council's Conservation Officer's advice that the proposal would result in substantial harm to this designated heritage asset. National Policy in the NPPF (paras. 193 to 195) does allow for this scale of harm on an exceptional basis, where it is justified and where it can be demonstrated that this level of harm is necessary to achieve substantial public benefits that outweigh that harm.
- 3.50 Consideration of the justification and why the public benefits outweigh the harm of the development is addressed in detail in the officer report for the Prior Approval application reference 20/00933/NPA. It is not necessary to replicate these points and the assessment in this report.
- 3.51 The Council's Conservation Officer advises that *"this is one of the rare cases where there is a clear binary choice, between consent being given for an application, which will result in a mix of total loss, and substantial harm to a designated asset, but which has a greater public benefit. In this case the survival and resilience of the railine in the face of climate crisis and sea-level rise"*.

3.52 Officers conclude that on balance subject to the resolution of two issues (i) the external appearance of the accessible footbridge and (ii) the method of joining the new sea wall to the listed station building to the satisfaction of the Business Manager prior to determination, conditional Listed Building consent should be granted. A list of conditions is set out at the beginning of this report.

#### **4. PLANNING HISTORY**

The relevant applications are;

- 19/02099LBC Refurbishment and modernisation of internal waiting area, LBC granted 17.01.20
- 17/02090LBC Installation of sixteen fixed focus CCTV cameras in dome enclosures, LBC granted 16.02.18
- 17/02025/LBC Addition of two radio microphone antennae, LBC granted 04.10.17
- 13/01290/DEM Demolition of signal box, may proceed 23.05.13
- 12/03594/LBC Retention of portal frame to the footbridge, granted 22.01.13
- 11/02347/LBC replace station footbridge span, dated 13.09.2011

#### **5. POLICY DOCUMENTS**

Teignbridge Local Plan 2013-33

Policy EN5 Heritage Assets

National Planning Policy Framework

National Planning Practice Guidance

#### **6. CONSULTEES**

##### **Historic England 08.07.20**

The works will have a significant impact on the experience of the seafront within the conservation area and its relationship to the railway. The council will need to ensure that the scheme is robustly justified, including consideration of alternative means to deliver the scheme.

The works will alter the visitor's experience of the historic seaside resort in view of the seafront and the historic connection of the town to the beach. It will also impact on the station building, through the loss of part of its platform but also a significant change to the setting of the station.

##### **Sub-frontage A: The Impact of the Proposed Works to Dawlish Water Basin**

The creation of a larger formal public space at this point presents an opportunity to extend the public open space created by Dawlish Lawns through to the seafront. It is unfortunate that the designs of the new footbridge and the barrier along the sea front have a greater solidity than the existing viaduct and therefore diminish the open nature of the breach and the views through to the sea. We appreciate that the nature of the works demands a solidity to its design, but we would encourage consideration to be given through the design approach of providing a greater link to the sea.

#### Sub-frontage B: The impact of the proposed works to the South west of station;

This section of the proposal impacts on the significance of the station through a loss of fabric in the form of the columns and their distinctive visual contribution. The council need to ensure that clear and convincing justification has been provided for the resulting harm caused by their loss. Opportunities should explored to accommodate the columns in a more meaningful way related to the significance of the listed building.

#### Sub-frontage C: The Impact of the Proposed Works to the Station Station Complex

The proposed conservation works to the downside waiting room forms a clear heritage gain. Currently part of the sea-defence, the building is in a poor condition having suffered extensive damage from the battering of waves and extreme weather as well as a lack of maintenance. The proposed addition of the sea-defence presents an opportunity to bring this building back in to beneficial re-use....we would highlight the need for the council to give careful consideration to how the conservation focused stages of the proposed works will be secured through the planning process.

The main intervention is the proposed new contemporary footbridge intended to provide access for all. Located north of the station complex, consideration has been given to separating it from the main station complex and limiting its impact on views from the town, However, the two uprights squared lift towers form a significant and dominant structures within views of the station. This is further exacerbated by the choice of Patterned Glass Reinforced Concrete (GRC), the hard finish of which will add to the visual dominance of the proposed footbridge.

We appreciate that any structure in this location will need to be able to withstand the harsh maritime conditions. We would advise that further consideration is given to the design of the structure. This should aim to address the shape and hard finish of the proposed towers, whose upper sections would benefit from greater refinement in their design. This could be through the choice of materials, colour and the creation of a greater texture or motif to break up the stark quality of the current design.

#### The Setting of the Station

The proposed new seawall/ promenade will run in front of the downside waiting room. This will result in the building being removed from its functional role as a part of the sea defence and will be a considerable loss of the building's significance. The proposals will also diminish the visual appreciation of the station from the beach and wider viewpoints as well as obscuring a number of interesting architectural features along its elevation.

It is not clear how ventilation will now be achieved to the external wall of the historic building, allowing it to breath and facilitating the drying out process, which is an identified benefit of the current proposals.

#### Sub-frontage D: The Impact of the Proposed Works to the North East of Station

This element of the proposal comprises the removal of the overhanging platform, which formed part of the 1875 phase of works and was then extended in the 1930s. This will result in the loss of the station platform and resulting impact on significance. Consequently, due to the loss of an element of the listed building sufficient robust information must be provided in order to assess the impact and determine whether there is sufficient justification for its loss.

### Sub-frontage E&F: The Impact of the Proposed Works to Boat House Building and Coastguards Interface

The boathouse and the footbridge are identified as non-designated heritage assets and are located within the conservation area. The proposals comprise the demolition of the boathouse and would obscure the lower section of the bridge. As they are not listed we do not propose to comment in detail although we note that these early structures are connected to the railway and Coastguards, and are interesting structures in their own right, both contributing to the significance of the listed station (as derived from its setting) and the conservation area.

### Seawall

The historic sea wall will be obscured by the current proposed scheme. Although not listed, it is a key element of the conservation area and its obscuration contributes to the impact of this scheme on the character and appearance and significance of the designated area.

The proposed reinstatement will link into the design previously consented along Marine Parade. This utilises concrete panels to construct the sea wall. In our view, careful consideration needs to be given to the treatment of the new construction around the key historic areas, including the station but also the basin area due to the direct visual link back into the conservation area. The choice and use of materials should seek to reflect a more traditional palette in terms of surface treatments and the finishes visible from within the space.

### Policy

The NPPF clearly sets out that in cases where development will have an impact on the significance of a designated heritage asset, great weight should be given to the asset's conservation (Para 194, NPPF).

Where schemes do result in a conflict between the proposed development and the heritage assets, the NPPF advocates that opportunities are sought to avoid or minimise the identified impact (NPPF, Para 190). It also positively encourages for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (NPPF, Para. 200).

Where the impact cannot be avoided then the resulting harm needs to be clear and convincingly justified (NPPF, Para 194). This needs to also consider alternative options (NPPF, Para 190), to robustly ensure that the scheme can be demonstrated to be the least harmful while achieving similar public benefits. The onus is the local planning authority to rigorously test the necessity of any harmful works.



### Historic England's Position

The proposed scheme constitutes a comprehensive change to the Dalwish Conservation Area and the grade II listed station.

The proposed scheme will have a range of impact on the conservation area and listed building including its setting. One of the most wide-reaching impacts is the impact of the new seawall on the character and appearance of the conservation area in terms of the appreciation of its seafront and its connection through to the town. It will also result in the loss of significance to the listed station, being no longer an integral part of the sea defence and having lost sections of its platform including the columns. The proposed new pedestrian footbridge will create a conspicuous addition to the station. Some conservation gain is provided through the repair and re-use of the downside waiting room, which will need to be secured through the planning process.

In our view there are a number of opportunities within the scheme where the harmful impact could be minimised through revisions to the design (NPPF, Para 190). This would allow for those elements of the affected asset that contribute to its significance to be better expressed through the resulting design (NPPF, Para 200).

Although the application is part of a wider scheme, the council will need to ensure that the proposed works are rigorously justified (NPPF, Para 194). Consideration should be given to alternative approaches that will minimise the potential impact of the scheme on a range of environmental factors including the historic environment (NPPF, Para 190). The historic environment is a key consideration in the assessment of the alternative options, ensuring that great weight is given to the conservation of the heritage assets (Para 193, NPPF).

### Recommendation

Historic England has concerns regarding the applications on heritage grounds. The scheme will result in harm to the character and appearance of the conservation area and the significance of the listed station.

The council in discussion with their own conservation specialists and the applicants, should seek to identify opportunities to address the concerns expressed above. This should include any amendments to minimise the identified impact, further clarification on specific elements or consideration as to how the benefits could be secured through the planning process.

Where loss of significance is identified, the council will need to ensure that robust justification has been provided, to allow them to rigorously assess the potential impact. They should be confident that the need for the works have been clearly demonstrated through the consideration of alternative options thus minimising the impact of the works on the historic environment.

### **31.07.20 Historic England**

The new supporting information presents additional justification as well as amendments and further details relating to aspect of the scheme where we have previously raised concerns.

Sub-frontage A: The impact of the proposed works to Dawlish Water basin

Our previous comments focused on the interaction and specifically the views through from the town to the sea.

The revised footprint design is more lightweight reducing the visual impact and allowing views through to the sea.

No further steps have been taken to break up the parapet along the section of the defence around the water basin, which will restrict views under the viaduct to the sea.

We wonder whether an alternative solution could follow other examples of sea defences and flooding prevention schemes in instances where access or an open character needs to be maintained. In those instances, systems of gates or timber infill complete the defence but retain a sense of openness when not in use. We wonder whether this approach could be utilised around the basin. The section of parapet could become planters which would link through to the character of the pleasure grounds creating a sense of public space. The local authority should explore these options with the applicant to try and identify a more permeable solution.

#### Sub-frontage B: The impact of the proposed works to the South west of station;

We would continue to encourage greater consideration be given to the use of the columns. In our view, their new use should reflect the former structural role as a group. Ideally we would like to see them incorporated into the section of the wall, maybe as breaks within the panels. Alternatively, consideration could be given to them forming a piece of art as part of the heritage trail, demonstrating their former use within the site. We appreciate that this suggestions may depend on their condition and structural integrity, which can only be determined once dismantled. The council may need to consider applying an appropriate condition to secure this section of works.

#### Sub-frontage C: The impact of the proposed works to the Station complex

Part of the heritage benefits offered by the current application was the prospect of bringing the Downside Waiting Room building back into use. The additional note provided, suggests that only one room will actually be brought back into use as part of this programme of works. This will limit the heritage gains offered by the scheme and we would encourage the council to secure a greater package of works for the site, which will need to be considered as part of their deliberation of the wider planning balance.

The other main aspect of discussion was the new bridge. The additional information on the choice of materials has looked to set out the justification for the approach. This appears to be largely based on the movement of sand resulting in the texture and colour. However, the context in which the bridge will be experienced is not the beach but against the cliffs, which are characterised by red earth and tumbling vegetation. In order for the design of the bridge to be less conspicuous, we consider that it needs to better respond to its surrounding context. This could be through a more recessive colour, and greater consideration should be given to its texture at the top of the towers. Furthermore, we wonder whether there is an opportunity to incorporate a green wall or areas of sedum to soften the overall design. Advice would need to be sought as to whether this could survive in maritime environment. The council should seek further alterations to the design, through consultation with the applicant and their conservation officer.

#### The setting of the station

With the new wall now looking to abut the historic Downside Waiting Room, we requested further details regarding the interface between the old and new structure. This was to ensure that the proposed works will enable the historic building to continue to breath and facilitate the required drying out process, which is an identified benefit of the current proposals

A detail has now been provided to show the junction between the existing station building and the new sea wall. This appears to be relatively high level and we consider that further information is required order to fully understand the potential impact.

However, at this stage we have a number of issues arising in terms of the proposed design.

These include -

- The isolation joint at the top of the interface is going to be a particularly vulnerable point within the structure. Careful consideration will be required to ensure that is robust but does not adversely affect the historic fabric. Clarification of the preferred solution should be provided.
- The drawing does not provide details of the station's construction and in particular its footings. This information needs to be understood at an early stage in order to inform the design and to be confident that the proposed interface will work effectively. Further details should be provided regarding the construction of the foundations and the walls, as well as whether any damp proof course exists.
- Notwithstanding the requested information set out above, we do have reservations regarding the uncompromising nature of the proposed solutions. We appreciate that the previous scheme setting the new wall back from the building to create a ventilation gap provided management considerations, but it has not been shown that these were not insurmountable through suitable maintenance, while providing a better environment for the listed wall structure.

We would encourage the council to seek further consideration to the approach of the interfacing to ensure that the benefits through the drying out process can be delivered.

Sub-frontage D, E & F

In relation to the above sub-frontages and on the basis of the information provided, we do not wish to offer any further comments on areas D, E & F. We suggest that you seek the views of your specialist conservation.

Seawall

We raised the need for careful consideration be given to the treatment of the new seawall construction around the key historic areas, including the station and basin.

Three options have been provided within *Note of Contrasting panels to the front of the Downside Building*. In our view, option 1 allows for a contextual reference to the station. A clearly modern interpretation, the design indicates the former role of the station as part of the defence.

### **Historic England's Position**

The proposed scheme constitutes a comprehensive change to the Dawlish Conservation Area and the grade II listed station.

It will have a range of impact on the conservation area and listed building including its setting. We consider and have identified above, that there are still opportunities whereby the scheme could minimise its impact on the historic environment. This would allow for the development to better express the affected assets' significance through the resulting design (NPPF, Para 200). Although the application is part of a wider scheme, the council will need to ensure that the proposed works are rigorously justified (NPPF, Para 194). Consideration should be given to alternative approaches that will minimise the potential impact of the scheme on a range of environmental factors including the historic environment (NPPF, Para 190). The historic environment is a key consideration in the assessment of the alternative options, ensuring that great weight is given to the conservation of the heritage assets (Para 193, NPPF).

### **Recommendation**

Historic England has concerns regarding the applications on heritage grounds.

Although the amendments have reduced the impact, the scheme will still result in harm to the character and appearance of the conservation area and the significance of the listed station. The council in discussion with their own conservation specialists and the applicants, should seek to identify opportunities to address the concerns expressed above. This should include any amendments to minimise the identified impact, further clarification on specific elements or consideration as to how the benefits could be secured through the planning process.

Where loss of significance is identified, the council will need to ensure that robust justification has been provided, to allow them to rigorously assess the potential impact. They should be confident that the need for the works have been clearly demonstrated through the consideration of alternative options thus minimising the impact of the works on the historic environment.

**Teignbridge District Council Conservation Officer-** Key issues raised are;

The impact ... is overwhelming in its scale and effects: all the vernacular character of the current sea wall, the lower-level promenade, the lower storeys of the seaward side of the downside station; the decorative elements to the coastguard footbridge, and the boat house will be lost. Either buried beneath the new sea wall, or demolished; for the listed structures the harm is substantial. The affect on the setting from the sea, and from the land, will be that views from the seaward side will be entirely different from that which they have been since the mid-19th century. The views from the landward side, both within and without the conservation area, will have a very different aspect towards the sea – from the upside platform passengers either seated, or alighting will have their views of the sea curtailed. The current permeability of the wooden railings on the seaward side of the down platform is considerable, allowing wide almost uninterrupted views to the sea and the adjacent coast and headlands.

The totality of the impact and change cannot be underestimated;... If the principle is acceded to that the change must take place, and the proposals implemented, to ensure the future of the line the only question is what redeeming mitigation can be achieved in parallel. ...the simple test set out by the NPPF:

*Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (para 195).*

### Summary of Impact

#### **The Sea Wall & New Promenade – Sub-Areas A-F**

The result of the proposals will be that the old sea wall, and all its ancillary structures will be lost by being subsumed into the new structure. The new wall, brutalist in tone, monumental in aspect, with its outward recurve will resemble more an international border wall than the familiar frontier between sea and land that is the historic structure. The vernacular character of the present wall because of its use of local stone, its relationship with, and the physical geography of, the locale will be lost entirely; and the remarkable permeability that exists today between town and station, and station and sea will be a thing of the past.

#### **The Stilling Water Basin adjacent the Colonnade Breakwater – Sub-Area A**

The result of the proposals will transform the low unassuming character of the basin, almost part of the beach, into a visually obtrusive and far more integrated part of the mass sea defences, connected to the wall structures north and south, spanned by the new concrete viaduct bridge, and with ramps up to the downside platform and down to the beach.

## **Colonnade Viaduct – Sub-area A**

It is not clear why the parapet walls need to be solid concrete here too, as they are no direct part of the sea defences and the new viaduct has three voids below.

## **The Downside Station – Sub-Area C**

The new sea wall will bury the whole of the seaward ‘Arsenale’ side and the three returns (one at the south end includes a fine doorway and former access to the beach) which shape the station under-storey from being simply a part of the seawall’s face, into a historical building in 3-dimensional form at this level. All under platform pier-posts, the re-used gas standards will be lost as part of the structure, though removed and re-used in ‘wayfinding’ (?).

The result of all the proposed works to the downside station is either total loss, or substantial harm to the existing structure and its setting. However, the sea wall, for all its aesthetic ungainliness is a 21st Century structure, it is appropriate that the new footbridge and lifts are too. It is very fortunately designed that there is sufficient room between them – even when tied together by the new secondary wall – allowing them both to breathe. It is a great pity that the attractive polygonal shape of the footbridge platform is not complemented by a slight batter to the outer sides of the lift towers, in an echo of the angled glacis of the station understorey, and sea wall.

The residual element of the downside station will be a single storey structure, tied to the secondary dividing wall, shorn of its lower storey; with the loss of the Arsenale setting from the sea it will be much shrunken. The proposed re-render will then remove all allusion to its former design and form. The station setting will be transformed, and whatever the greater benefits to the railway per se, not for the better: there will be a complete alteration of views to and from the station from town and beach. Though the railings are designed to allow some permeability to the structure, in truth they are an aesthetic gloss, though not unattractive, that will do very little to offset what is probably a unique and dramatic sea view from both sides of the station. This is further curtailed from the south part by the new bridge and lift towers. The loss and substantial harm are manifold and obvious, however necessary the sea wall and all its ancillary components are.

## **The Coastguard Footbridge and Life Boat House – Sub Area E**

The impact on the footbridge abutment is similarly to that of the sea wall on the lower storey of the downside station: lost behind the 6-7m width of infill between the new wall and the old; its handsome plinth and decorative paired lancet windows buried, and much diminished as a structure....The proposal for the boatshed is simply demolition, even with the slight lowering of the height of the new sea wall here, the raising and infilling would come to present eaves level (see elevations as above for the footbridge).

## **PROPOSED MITIGATION**

### **General Mitigation**

- I. Podiums and viewing areas in the new basin;
- II. Heritage Interpretation boards;
- III. Discrete new seating, variously concrete, limestone (re-used), or granite; and
- IV. Marine wildlife traps, and habitat niches in the basin area.

## **Specific Mitigation**

- i. The re-use of material from the Lifeboat House
- ii. Reuse of the Pier Posts/gas lamp standards
- iii. Building Recording
- iv. The New Footbridge (A major addition to the original scheme)
- v. The conservation of the Downside Waiting Room

### **The Re-use of Material from the Lifeboat House:**

'To reuse some of the material within the locality as part of the new landscape. This is the one area of mitigation which is actually under emphasised...seating type 2 will be reclaimed limestone and will be used to delineate the footprint of the boathouse building as well as some of the proposed seats in front of the station building.

### **The Re-use of the Gas Lamp Standards:**

'To be retained on site and to be used as part of the Wayfinding Programme'. There is no further definition of that programme in any of the application submissions.

### **Building Recording:**

The Sarah Dyer Photo Recording (SDPR) reports have already been completed; they cannot be seen as mitigation, only a part of the application. In any case the NPPF makes such recording a requirement: 'the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted' (para 199).

### **The New Footbridge with Step-free Access:**

A major addition to the sea wall programme, it nonetheless brings with it its own impact, to the station and its setting.

### **The Conservation of the Downside Waiting Room:**

...the mitigation for the station, with exception of the details set out in the application, such as platform paving (Details sheet 1, drawing 000041), and the raising of the station doors (Interface Details sheet 01, drawing 000040), remains aspirational and in the HS it is fundamentally couched in the conditional language of recommendations.

## **FURTHER CONSIDERATIONS OF IMPACT AND MITIGATION**

Physical fabric survives of Brunel's 1846 atmospheric pumping house in the car park. The car park site, while not the focus for any development itself, is earmarked to be the construction compound. The volume of stored material, deliveries and road movements will be of a much greater scale, and the potential for impact upon the fragile relict structures is very high. A full survey of the Brunel survivals, and a method statement for their protection during the construction programme, incorporated into a Construction Environment Management Plan (CEMP) is essential – as is their subsequent conservation and interpretation.

Proposed Sections I & J (drawings 000105-106) show the proximity of the piles to the downside station...consideration should be given to the potential impact on the station, and those different elements at the different chronological interfaces, where the structural integrity will vary: the two sea walls of 1846 and 1875, the aesthetically poor and later concrete and metal frame roof etc...While this will doubtless be addressed in a future Construction Management Plan (CMP) it should also be considered as part of the formal building condition survey with specific request for the impact of piling.

## CONDITIONS Recommended to be Attached to 20/00922 LBC

### CONDITIONAL MITIGATION

Conditions will need to be attached to any schedule of consent, but before that further preparatory work is required and must be submitted prior to determination. As noted above the proposed conservation of the downside station building is only narrowly defined in the application, its scope illustrated by the Heritage Sketch 06 Proposed Station in the HS (p.110). That it is not wider in extent is clear from Arup's clear statement that the conservation approach to restoration takes place over a phased period, and that **A full specification, drawings and schedule would be required.** (HS, p.101).

#### *Requirements:*

- The condition report *The Conservation of the Downside Waiting Room* in the HS (pp. 77-78) should form the basis for a full Building Surveyor's Report; this should also assess and address the stability of the building when piling adjacent.
- This report when completed should inform a method statement for full repair predicated upon the *Conservation Works Phased Study to the Downside Building* set out in the HS (pp.95-103). This must also include a new roof canopy, based on the original design – original gables survive. The HS is clear in its estimation of worth of that extant: 'Aesthetically the later [concrete and metal frame] roof is not in keeping with the original design and is in poor condition' (p.36); and 'the new canopy has been designed to have any additional rainfall from the platform fall inwards directly onto the inner face of the downside waiting room building. This may be causing additional damp' (p.97). Any conservation of the station building undertaken with such a system left in place would be completely undermined.
- Subject only to the method statement, the urgency of the works is paramount: Arup's recommendation in June 2020 was that the **Stage 1 (urgent works)** are carried out as soon as possible and that the new wall is constructed *between* stage 1 and Stage 2. This means that stage 1 works must be completed before sea wall construction begins in the listed building area; i.e., stage 1 works should be a pre-commencement condition.
- It is inappropriate that the facing of the new sea wall below the station, the area equivalent to an 'elevational-footprint' of the lower-storey building, should use the same concrete panels as elsewhere, with no attempt to acknowledge the loss. Historic England in its response to the scheme (8 July 2020) aired its concerns:

*[The Sea Wall] is a key element of the conservation area and its obscuration contributes to the impact of this scheme on the character and appearance and significance of the designated area. The proposed reinstatement will link into the design previously consented along Marine Parade. This utilises concrete panels to construct the sea wall. In our view, careful consideration needs to be given to the treatment of the new construction around the key historic areas, including the station ... The choice and use of materials should seek to reflect a more traditional palette in terms of surface treatments and the finishes (p.4).*



Three solutions are possible, from maximalist to minimalist:

- i. Between the new stair ramp to the beach, north of the colonnade underpass the panels to the sea wall up to the Coastguard Breakwater (extending from the Listed building area into that of the NPA) should be limestone, not concrete. The panels should be fabricated in relief that the 'ghost' of the lost lower storey, with its blind recesses and returns, echoes the buried structure within.
- ii. The panels representing the lost lower storey only should be in limestone, with its blind recesses and returns in relief; the sea wall, as elsewhere continues in concrete.
- iii. The panels should remain in concrete but be fabricated in high contrast relief: colour, texture etc., that the 'ghost' of the lost lower storey, with its blind recesses and returns, echoes the buried structure.

It may be objected that the width of the new seawall will give rise to distorting parallax views, but overwhelmingly the views will be from the front, and the 'ghost' will be immediately legible in its setting, especially when coupled with the proposed interpretation boards. At the south end of the sea wall the relief panels will have to be extended over the lower end of the ramp to the beach where this overlaps the sea wall, (see Proposed Elevation A Sheet 04, drawing 000033).

- Similarly, the lost volume of the lower storey, with its returns and re-entrant angles should be expressed in the promenade walk above; super-imposed within the design shown on proposed plan sheet 06 (drawing 000028).

### **Senior Historic Environment Officer DCC**

A programme of historic building recording has been undertaken as part of the overarching works to the sea wall at Dawlish and, as such, I do not consider that any additional mitigation is required for the impact upon the heritage asset that is the railway station.

## **7. REPRESENTATIONS**

Five comments in support and one objection have been received. Those in support raise the following points;

- The impacts of the 2014 closure were massive
- A reliable resilient railway is vital as we recover from the pandemic
- The globally recognized tidal and coastal experts working for NR have put forward the best solution for the town and railway.
- Providing improved facilities for passengers at the station and pedestrians on the sea wall.
- Use of local labour, materials and accommodation is welcomed
- An open railing on the new elevated footpath is not practical
- The new sea wall will deflect spray that presently drenches passengers on the open timber platform.
- In considering these proposals one has to bear in mind the tidal range which, at present, frequently covers the lower coast path and limits access to its continuation under the timber platform structure
- The suggestion of the TDC Conservation Officer, in an 18 page report, that the new seawall carries visual echoes of the present plinth structure on its outer face, is not going to be understood.
- With climate change doing nothing is not an option

- Benefit to tourism

The comment against the proposal raises the following points;

- Height of footbridge will dominate existing listed building
- Positioning with angled towers is out of place
- Bridge is unnecessary as step free access would be available using the new sea wall
- Why not one lift shaft on Newton Abbot side?
- no guarantees the current station footbridge won't be closed to passengers in the future

## 8. TOWN / PARISH COUNCIL'S COMMENTS

### Dawlish Town Council -

Comment: (for applications 20/00922/LBC and 20/00933/NPA) **RESOLVED** by majority of Members present and voting that this Council **OBJECTS** to the applications with the following comments:

- The protection of the railway is welcomed and acknowledged as a critical element of Dawlish. However, there are still questions regarding specifics of the design in terms of accessibility, safety, retention of heritage features in a conservation area and ensuring new elements are sympathetic to the existing structures and character of Dawlish as a town.
- Access to the beach for those with mobility issues is important and there is concern regarding a lack of ramp down to the beach and escape steps from the beach to the sea wall.
- The inclusion of the lift and bridge are welcomed. However, the lift design could be less brutal. Members suggested cladding in local stone and a low apex roof would be more in keeping with the original design of the station.
- Members would like to see as many historic features retained as possible, noting the comments of the Local History Group speaker and the heritage statement.
- Members agree with the concerns regarding the design of the stilling basin referenced in the Teignbridge submission.
- Members feel that a breakwater should still be considered as part of a long-term solution.

## 9. COMMUNITY INFRASTRUCTURE LEVY

This is a Listed Building application and as such is outside the scope of the CIL regulations.

## 10. ENVIRONMENTAL IMPACT ASSESSMENT

Due to its scale, nature and location this development will not have significant effects on the environment and therefore is not considered to be EIA Development.

## **HUMAN RIGHTS ACT**

The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

## **12. EQUALITIES AND DIVERSITIES**

This listed building application has had due regard to Section 149 of the Equality Act 2010 with regard to the Public Sector Equality Duty and the case office has concluded that the application does not cause discrimination on the grounds of gender, race and disability.

## **Business Manager – Strategic Place**