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Dear Mr Murfitt

Pre-application Advice

RICHMOND DOCK, NEW QUAY STREET, APPLIEDORE, DEVON

Thank you for asking for Historic England's advice in relation to proposals for Richmond Dock. Please find our detailed comments on the scheme below.

Summary

Whilst the proposed use of Richmond Dock as a storage facility for the World War II Schnellboat (and other craft) from the Wheatcroft Collection is acceptable in principle, we find that there are some elements of the scheme that require clarification before we are able to assess if unacceptable levels of harm will be caused to the grade II* dry docks.

We consider that some harm is caused to the dry docks by the installation of a roof - this could be partially resolved through design amendments. The remaining residual harm caused by the introduction of the roof per se may be acceptable, given the need to balance finding a new use for the dock and achieve associated repairs, against some harm to its legibility and appearance.

We note the changes proposed that would result in the dry dock becoming a wet dock. This results in considerable alteration of its function and significance. The change is harmful and is not robustly justified. We query why the boat(s) could not be stored in the dry dock in the traditional manner, avoiding the harm that we identify.

Advice

The significance of Richmond Dock

Timber was imported to England from North America in the early 19th century when sources of supply from the Baltic ports were affected by the Napoleonic Wars. This trade gradually developed into shipbuilding in Appledore by James Yeo, with ships constructed on Prince Edward Island (in the Richmond Bay area – from which the





dock gets its name) and sailed over to the Torridge estuary for fitting out. About 55 ships from Prince Edward Island were finished here in 1843 to 1853.

Richmond Dock lies at the centre of Appledore where ship building on the foreshore has likely been carried out since medieval times. The dock was built in 1856 by William Yeo (James Yeo's son), and at the time was said to have been the largest dry dock in the Bristol Channel. The specific function of a dry dock is to float ships and boats in at high tide, close the gates, and drain the water out to enable works to take place in the dry.

The dock is built from concave stone rubble walls with integral steps at various locations, stepped out in two stages at the top. The inner end is curved and the east end has 20th century lock gates to control the water. The floor of the dock is concrete. A 20th century gantry that was previously in situ has been removed. Land associated with the dock was used for storage of materials, the location of machinery, and associated structures, and boat building.

The form and structure of the dock has value as a rare and interesting structure, but its heritage significance is derived primarily from its function as a location for building and repairing ships. Its operation as a dry dock is therefore fundamental to its significance.

The maritime history of Appledore has shaped its character and appearance. Whilst large scale ship building moved to Bidna in 1970, Appledore retains a strong relationship with the river and the sea. The ship building industry has played a major part in the economic and social history of Appledore. The dock lies both physically and culturally at the heart of the community. The working history of the dock thus has considerable significance nationally and locally. Ship building and repairs were carried out here until the early 1980s, bringing employment and prosperity to Appledore.

Richmond Dock is listed grade II* identifying it as one of the top 7% of all listed structures and buildings in England. It is of 'more than special' historic or architectural interest.

The dock is on the national Heritage At Risk register (HAR), in the 'at risk' category. It has been vacant and in need of repairs for some time. Clearly, it would be highly beneficial for the site to have repairs undertaken and for a suitable new use to be found for it. This would help lead to its removal from the HAR register and provide it with a sustainable future.

The impact of the proposals on Richmond Dock

The proposal is to repair the docks and landscape the surrounding associated land. The dock will be used to store the World War II Schnellboat (and other craft) in water, with a roof covering the dock. An office, kitchen and toilets will be built within the complex.



Landscaping, office and other facilities

Historic England have no objection to the proposed landscaping. We also have no concerns about the introduction of an office, kitchen and toilet block within the site (subject to their scale). There is clear photographic evidence of a series of ad hoc temporary structures being erected on and removed from the site during its working life. We consider that a new structure will not conflict with its history. We do not wish to offer further comments on these aspects of the scheme and refer you to the local planning authority for any further advice.

The proposed use of the dry dock as a wet dock

Fundamental to the heritage significance of Richmond Dock is its function as a place for the repair and building of boats out of water. This significance has been emphasised by paragraph 8 of the Planning Inspector's appeal decision on previous proposals for the site (see below).

We therefore consider that storing the Wheatcroft Collection's boats in water - turning the dry dock in effect into a wet dock, would cause it very high levels of harm. We query the need for the dock to be permanently in water. Would the Wheatcroft Collections' boats be harmed or in fact better preserved by being supported in the dry dock in the traditional manner? It would be helpful to have further clarification for this element of the proposal, to gain a better understanding of the justification for the dock being in water all the time. We draw your attention to the successful storage and presentation of other historic craft in dry docks at several other historic docks, including Chatham and Portsmouth.

There are also practical implications for turning the dry dock into a wet dock. Marine engineering advice will be required regarding the impact on ground water levels in the immediate area surrounding the dock, and the potential impacts on neighbouring properties (some of which are likely to be heritage assets in their own right). We consider that this information will be needed by the local planning authority so that they can make fully informed recommendations.

The dock gates have been designed to keep water out and not in – there would be a need to adapt the gates or provide new gates for the dock to be kept in water. Both of these options will cause harm to this part of the dock by changing or removing their function. However, we do not have information at this point about the extent of changes needed. This information would again be useful at pre-application stage to assess levels of harm and provide fully informed advice.

There are also implications for the dock structure itself – algae and plant growth is inevitable on stonework if it is flooded for longer periods and this can cause stone and mortar degradation. Supporting mechanisms and structures (sluices etc.) must be in a



good state of repair to facilitate the opening and closing of the gates and being in water will cause a change in their condition and performance.

In summary, there will be major inspection, maintenance and repair issues for a structure that was not built to be in water all of the time. A Maintenance Strategy would be required to address this but even with such a strategy in place, this would not remove the high levels of harm caused to the dock's significance. This harm to the docks could be avoided completely by retaining the dock's current function and flooding the dock only when required. We strongly recommend that the proposals are amended to address this issue and avoid the harm that we have identified.

The proposed roof

Richmond Dock did not have a roof during its use as a dock, but did have occasional gantries and cranes above and around it for working on boats. The introduction of a roof will limit the docks visibility (even taking into account the high walls surrounding the site currently) and legibility as a dry dock, and therefore we consider that some harm will be caused to its significance.

However, we acknowledge the need for a new use for the dock and the associated heritage benefits that the proposal will bring. We therefore consider that the harm may be capable of being balanced against these heritage benefits. We presume that evidence can be submitted in due course to support the need for the boat(s) to be kept under cover – this would be helpful in creating the clear and convincing justification required.

Historic England strongly recommend that any roof is designed with reversibility in mind. The ability for any roof to be removed in due course, leaving no (or minimal) harm to the dock's fabric and functionality would also help in providing justification for it in the current circumstances.

The current design proposed for the roof to the dock is in part green (sedum) and in part decking, with light provided by ETFE roof windows. We have concerns about this design approach, given the industrial character of the site. We consider that a green roof is out of keeping with the site and its greater context of the village of Appledore, and recommend that an industrial aesthetic would be more appropriate. Devonport in Plymouth may provide some regional design references and ideas. Coverings should be practical – sheet metal with timber boarding would not be untypical of dock covers.

Historically roofs on other docks tended to have numerous roof lights for good working conditions, adding to their architectural value by creating a strong rhythm across what is usually a massive roof, and particularly designed for the practical needs of the work taking place underneath.



Public access and interpretation

We understand that for the majority of the time the site will remain closed to the public. We accept that the working dock would also have excluded the public, and that there will therefore be little change to the existing arrangement.

However, where harm is caused to a heritage asset (as we have identified above), this should be balanced in planning decision making against any public benefits. One way to provide such public benefits is to allow access to the public to view the Wheatcroft Collection's boats, and to allow the use the space within the dock's landscape for other community events and educational activities.

We understand that you may have already explored the possible opportunities to work alongside the Appledore Maritime Historic Trust, the Local History Society, owners of the former Appledore Lifeboat, and the local Gig Rowing Club to provide such access and allow co-operative uses. We encourage and support this.

Other public benefits could be brought forward through improved interpretation on and off site, (including virtual public access / films viewable in other locations such as the Maritime Museum), periodic tours, inclusion within Heritage Open Days etc. A Public Engagement Strategy could also include training opportunities for young people and apprentices, school visits, story-telling, links to local community history groups, oral history research etc.

We strongly recommend that this is formalised within a submitted Public Engagement Strategy alongside any planning application, to ensure that the public benefits that this would bring to the local community can be ensured via planning condition by the local planning authority.

The previous appeal decision and policy issues

Unacceptably harmful proposals for housing on the site were refused by Torridge District Council in the past, and then dismissed at appeal. The Planning Inspector's appeal decision (APP/W1145/E/11/2144897) is a very helpful guide to what makes the dock special in heritage terms, and the considerations that will have to be taken into account by Torridge District Council in their determination of any application for future change.

Of particular interest is the Inspector's reference to the significance of the dock being inextricably linked to it being a tool for building and repairing ships:

"Its operation as a dry dock is thus fundamental to its significance. For this reason, and in view of its role in the working life of the community, I consider development that would prevent or seriously curtail the operation of the dock as a dry dock for the building and repair of boats would therefore amount to substantial harm to the



significance of the listed structure" (appeal decision paragraph 8).

This statement clearly emphasises that the dock's significance stems from its function as a dry dock – changing that function would cause it very high levels of harm. The Inspector put this harm into the 'substantial harm' category as defined within the National Planning Policy Framework (NPPF), at paragraph 201.

The identification of substantial harm by the Inspector may have been in part due to the permanence of the housing and therefore the irreversibility of the harm – the docks would never have been capable of being used for their original function again. Nonetheless, we note the Inspector's position that prevention or curtailing the operation of the dock as a dry dock could amount to substantial harm to its significance.

We refer you to paragraph 201 of the NPPF which explains in detail the tests that would need to be met should substantial harm be caused to the docks. This is an extremely high test to meet. It should be noted that if substantial public benefits are not the planning outcome of proposals (which we consider the current proposal does not provide), **all** of the a-d categories must be met. Ideally substantial harm is avoided at the outset, through a scheme that does not affect the function of the dock as a dry dock.

The Inspector goes on to say in paragraph 13:

"PPS 5 [policy document now superceded] acknowledges the importance of finding a viable use to secure the future of the heritage asset and notes that the original use may no longer be possible. The optimum viable use is not however necessarily the most profitable one, but one that causes the least harm to the significance of the asset".

This demonstrates that some flexibility of use is possible. Our interpretation of this does not however, extend to the change of the dry dock to a wet dock – in particular because the dock could remain a dry dock and still fulfil the requirements of your client, avoiding the very high levels of harm we (and the Planning Inspector) have identified above.

The NPPF (alongside local planning policies) will be used to assess the proposals for the site. The NPPF identifies that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 189).

Other paragraphs explain in detail the requirements of applications, and the balancing exercise that local authorities must undertake to weigh the conservation of heritage assets against development proposals. We refer you in particular to paragraphs 194,



197, 199, 200, 201 and 202.

Historic England's position

We support the use of the dock for the storage of the boat from the Wheatcroft Collection in principle. However, as identified above, the change to the dry dock to a wet dock has implications for the significance of the docks, its fabric and potentially other nearby property. We seek clarification on this, and query the justification for the change.

Turning the dry docks to a wet dock is highly likely to cause very high levels of harm. We encourage you to amend the proposals to enable it to be retained as a dry dock, which we consider will still allow for the safe storage of the boat(s) and will better conserve the significance of the dock.

The introduction of a roof to cover the dry dock will cause some harm to its legibility and significance. However, we consider that (subject to design changes as identified above) the roof is likely to be an acceptable compromise. The residual harm caused will be balanced against the repair of the docks and its removal from the HAR.

Next Steps

The length of this letter reflects the complexity and nuance of the heritage issues that need to be addressed in relation to the conservation and reuse of the dock. We hope that our advice is helpful and encourage you to amend the scheme to address the heritage concerns that we have outlined.

Should you wish to engage further with Historic England we can offer additional input via our Extended Advice Scheme. This service is charged for on a cost recovery basis, and via issued and accepted quote. More details can be found here:

<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/extended-pre-application-advice/>

Yours sincerely

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cc: Sarah Chappell, Torridge District Council

RICHMOND DOCK, NEW QUAY STREET, APPLIEDORE, DEVON
Pre-application Advice

List of information on which the above advice is based





Historic England

Teams call with applicant's agents representatives of Torridge District Council
Email correspondence
Landscape plan
Section view as proposed
Site plan as proposed
Structure plan as proposed
Plans, sections and elevations as proposed
Site section as proposed
Environmental section as proposed
Pre-app statement



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