

Protecting theatres  
for **everyone**



Ref.: TC/41

21 April 2023

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**Application:** BH2022/02443 & BH2022/02444

**Site:** The Hippodrome 51 And 52 - 58 Middle Street Brighton BN1 1AL

**Proposal:** Restoration, renovation, part-demolition works and extensions to The Hippodrome to create a new mixed use development including multi-format performance space (Sui Generis), office space (E) and apart-hotel (C1), restaurant/café (E) with rooftop bar and terrace (Sui Generis) including; erection of new apart-hotel building fronting Ship Street of 3 to 7 storeys with retail (E) at ground floor, conversion of existing Hippodrome Fly Tower to create serviced office space, conversion of Hippodrome House to provide bar, members club with external terrace and 16-room apart-hotel, and other associated works.

### Remit:

Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.

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**Comment:**

Thank you for re-consulting Theatres Trust following submission by the applicant of additional documents and revised plans.

In our original comments of 7<sup>th</sup> October 2022 we indicated that due to insufficient evidence and detail to support an application of this nature for a heritage asset of such significance, and because of flaws with proposed plans which would undermine the sustainability and viability of the proposed use, our position would be to object to the granting of planning permission and listed building consent. We had urged the applicant to address our recommendations in relation to operational viability and provide further information and justification in relation to loss and harm to heritage particularly within Hippodrome House.

We welcome that revisions have been made to the proposed plans which go some way towards addressing previous concerns and objections. In terms of internal layout and function to back of house areas and within the fly tower there is some improvement. In particular, the removal of serviced offices from the fly tower has given much needed additional space and facilities over to the event/performance function, including the addition of an indicative rehearsal space. Operationally there is now less complication and scope for potential conflict around the Elephant Yard which improves function and safety, partly through having one less use (the serviced offices) and partly through the apparent removal of external seating for the Members Bar. There is now a slightly more straightforward access route to the stage for get-ins (delivery and removal of equipment, props and sets for shows). Externally, the massing of the serviced apartments to the rear yard has been reduced and we consider this now sits more comfortably with the existing building so has reduced impact on its setting.

Nonetheless, we still have significant concerns regarding the operability and viability of the scheme as a venue for live music, comedy, cabaret, conferencing and other such functions and events. This is based on our own expert advice informed through engagement and consultation with established venues and operators offering similar provision at a similar scale and capacity. These matters will need to be addressed if the flexible, multi-purpose use for Hippodrome is to be a success and the loss and harm to heritage of such a significant asset is to be justified.

The following are our high-level priority areas for action if planning permission and listed building consent are to be supported. These points are focused purely on

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making this scheme viable and successful, something which is essential not just for the applicant but for the wider community in Brighton:

- There needs to be demonstration of realistic understanding of what could be programmed at the Hippodrome and how the types of acts cited by the applicant in their public statements could be accommodated given the limitations of the proposal, and of the strategic positioning of the Hippodrome as a venue within the local and regional market.
- There should be less reliance on the 2015 viability report which at eight years old is now becoming an out-of-date assessment, and for the report to be updated or carried out fresh.
- There are major challenges around get-in and provision for hosting the programme envisaged, including arrangements most tours will find unacceptable, and a general lack of backstage facilities. This is particularly pertinent given more recent changes in regional touring and will need to be addressed through revised plans.
- There is currently lack of clarity within the submission on transport and highways matters; under current plans there would be need for road closures during peak travel hours to accommodate and manoeuvre large vehicles including articulated lorries and tour buses. There appears to be an under-appreciation of the transport needs of touring shows and where these could be accommodated.
- There are inadequate front of house facilities for the scale of the venue; in particular opportunities should be identified to increase bar provision but also facilities for staff and management.
- There is inadequate accessibility within the auditorium, to the new front café/bar and to Hippodrome House including the new serviced apartments; these should be made to be wheelchair accessible. There should also be efforts to provide a Changing Places facility.
- There remains an under-appreciation of the historic significance of Hippodrome House and how this could be retained as part of the venue to partially address under-provision of audience facilities

Our suggestions as to how these points might be satisfactorily addressed are set out below:

### Programme and meeting the needs of the market

An underlying flaw is that there appears no clear understanding of how the Hippodrome's offer would fit with existing venues in Brighton or the wider catchment,

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relying heavily on an eight year old study which would now require some degree of reassessment to reflect a more up to date market. We recommend a new or updated study, again to inform the needs of the venue.

It would be highly beneficial for the applicant to appoint an operator and for that operator to have input on the plans so that it can be delivered to meet their specific needs avoiding later revisions or undoing work that has already been carried out. We suggest that having an operator signed up prior to development commencing, approved by the Council in consultation with Theatres Trust, is made a condition of any planning condition. This is an approach which has been utilised elsewhere, and would afford a greater degree of confidence that these plans can be successful.

### Meeting the needs of touring acts and other events

We continue to urge the applicant to engage the services of a specialist consultant who understands performance venues and can help the applicant plan its spaces to meet the needs of those it hopes to attract. This will inform designs and layouts both front and back of house ensuring the venue has sufficient loading and technical capabilities with supporting back of house provision.

Given the large audience capacity of the Hippodrome and the indication from public announcements by the applicant that they hope to attract significant acts (for example inviting the Rolling Stones to play the opening night as cited in local press) there would need to be efficient and sufficient stage access, back of house facilities for performers and storage capacity for sets and equipment. There would need to be sufficient height and width to get larger equipment into the building and delivery space for vehicles to unload. The current plans restrict what can be achieved.

As well as drawing on our own expertise we have engaged with established operators of venues of similar scale and who run a similar programme to that envisaged by the applicant. They have both confirmed our existing understanding and provided additional operational guidance. We consider the applicant's proposed arrangements would only be acceptable for a limited range of established acts or for small-scale/emerging acts with limited equipment (for whom a venue of this capacity would in any case be unrealistic and unviable).

For live music acts of the scale who would realistically tour to venues of the Hippodrome's capacity, for example Fontaines DC, Frank Turner and Paloma Faith, the typical minimum requirement would be for at least one large articulated lorry and a large double-decker tour bus for artists with a further bus for supporting crew. Advice from operators confirms that many acts of this scale, including those cited

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above, have additional vehicles on top of this due to more elaborate stage shows and/or for speed and efficiency given schedules may require them to travel long distances - up to three articulated lorries for mid-scale touring. On top of vehicle capacity requirements there also needs to be quick and efficient means of unloading to the stage, and re-loading back into the vehicles immediately after shows. In contrast, despite some improvement the get-in route is still long, requiring manual handling of kit over a lengthy route which will be unappealing to touring shows. Elephant Yard only has the capacity to hold one large vehicle at a time. In addition, due to and the tight nature of Middle Street and available space into the Elephant Yard it is suggested that it would take around fifteen minutes for a lorry to park. The lorries and buses would require parking and link-ups to the venue to support for example catering and showers. Bands and musicians typically utilise their own PAs, audio, lighting and backline. It should further be noted there would likely be multiple get-ins and get-outs every week.

Other types of realistic acts will have different requirements for which proposed plans are still problematic. For example, a DJ may operate from a relatively small set of decks but typically will also have a complex light show and large screens for visuals. Weddings and conferences would utilise small vehicles but there would be several movements and this again creates impacts on the local highway network. Similarly cabaret acts may have large casts and need for equipment.

Typically unloading will take place early in the day with set-up and soundchecks some time prior to the show which would coincide with peak local traffic movements and school drop-offs; late set-ups just before the start of shows would generally not be acceptable. There may be further vehicles and movements associated with support acts. Equipment would be immediately removed after the end of the show meaning the Elephant Yard would not be appropriate for audience/guest/public use including as an envisaged late-night exit. Most acts and other hirers would require the auditorium for some hours prior to shows and events leaving it unavailable for use by others.

Another fundamental omission is space for storage of fly cases and other equipment; we would generally urge additional space to be given over to back of house functions. Likewise, consideration needs to be given to storage needs for front of house to allow different layouts and configurations, such as packing away cabaret tables or seating. There is a storage area indicated on the plans however, the practicalities and time associated for the changeover of events needs to be carefully considered alongside the business plan and programming of the space.

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We believe there is scope to improve back of house function and minimise harm through enhancing future reversibility and through further re-design of functions within the fly tower. In particular there could be better separation of serviced apartments from the venue. We suggest the removal of bedrooms within the stage house so that all of this space is given over to the venue. Some of this space could be given over to dressing rooms which are almost completely absent from existing proposals. It would also help address possible issues with regards to acoustic separation and disturbance to occupants. It would also be preferable for the escape stair to the hotel to be moved out of the volume of the stage house. The apartment to the top of the fly tower could however potentially be retained if it were designed to be reversible; this would need careful consideration of services such as drainage.

### Meeting front of house needs

Even if acts are attracted that could successfully overcome the logistical challenges and limitations set out, neither do we consider there are sufficient front of house facilities to successfully meet the needs of larger audience capacities. In particular there is a lack of bar space needed for a venue of this capacity and this is compounded by the loss of Hippodrome House to alternative commercial use which previously served that function. There will also be a need for merchandising points, another important income generator for live performance events.

There are also more fundamental shortcomings; there is no wheelchair access into the lower stalls area. The new front bar will also be without direct wheelchair access which requires an alternative route. With the stalls being effectively in a new layout this is something that should be addressed. There are large drops in levels within the stalls and we believe this will give rise to issues with poor sightlines from some positions.

To help overcome these challenges and other outstanding concerns within the auditorium we have a number of suggestions. Whilst mobile bars to the rear of the auditorium could address shortage of provision to some extent, retaining access to lower levels of Hippodrome House (which are the historically significant parts) and use of it for this function could both be a good solution operationally and address the heritage concerns we had previously set out. Currently access between the auditorium and Hippodrome House would be blocked. There is a potential route through that could be created next to the northern main entrance to the Hippodrome. Irrespective, efforts should be made to retain the fabric within the ground floor of Hippodrome House or to re-locate/re-create Palm Court and other areas on interest.

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It appears that accessibility could be easier to resolve, as it would require some minor revision of internal arrangements and works to the threshold to the former foyer/proposed café/bar.

We have already noted the need to engage with a specialist consultant who understands performance venues and they will be able to further inform the design to address concerns regarding front of house provision, in particular sightlines and technical set ups (positions for lighting, PA's etc) that will be required in the auditorium.

### Heritage matters

Despite our previous comments there remains no additional research on Hippodrome House and its significance or any explanation or justification for loss of it. Much of the addendum to the Heritage Statement is utilised for rebutting the Council or defending the original submission, rather than addressing the shortcomings and omissions that we and other consultees had identified which would assist with the granting of listed building consent and the recording of important features and fabric. Again, we recommend revision and proper explanation and justification where there is to be harm or total loss, or optimally for changes to the scheme as raised above.

There has been no additional research on the importance of the Palm Court Lounge which was created in 1939 to resemble an old Italian garden. It is our view that it is of architectural importance and part of the building's history. It should be retained and restored rather than demolished.

It is stated the Grand Master will be relocated to a more prominent position, subject to condition. Although improving access can be considered a heritage benefit, it is also the case that part of the equipment's significance derives from it being in its original location which makes it particularly rare. On balance however we could support re-location on the grounds that it could be re-located back to its original position in the future. This aspect of the proposal will need to be appropriately conditioned.

We note from historic images that the front elevation of the Hippodrome was previously more decorative and elaborate than is currently the case. Although not something we have raised before, we suggest this development may be an opportunity to reinstate lost elements to help make the Hippodrome more prominent and to provide a heritage benefit which would further mitigate harm and loss elsewhere within the scheme.

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### Concluding comments

We remain of the view that the Hippodrome can be viable as a large-scale theatre and that there is need for such a venue in Brighton. This scheme will not allow for larger shows or other live events by established acts and will preclude prospect of reversibility in the future. This is clearly explained in our existing comments. We recognise that the current funding environment for full restoration to large-scale theatre use is very challenging, but note that it would also be challenging to provide a replacement large-scale theatre elsewhere in the city due to cost (which may in total exceed full restoration costs for the Hippodrome) and lack of available sites. It is therefore for the Council to decide whether loss of potential large-scale theatre function for the city and its residents is acceptable.

Whilst not the optimum viable use in heritage terms we had already accepted the applicant's proposed use for the auditorium and associated functions was in principle a potentially sensitive and compatible use which was close to original function. In light of the applicant's response statement to our previous representation we wish to make it clear that our comments and recommendations on their proposed use and plans, both within the previous letter and in this one, are entirely in relation to their scheme as presented. This is focused on whether the plans are capable of delivering a functional and viable multi-use facility which would secure the Hippodrome into the future (and justify harm and loss of heritage value) and whether they would facilitate the aspirations the applicant has promoted locally. Our advice and objectives in this regard may have been misunderstood by the applicant.

Whilst this proposed use could be acceptable and a viable use of the Hippodrome, and the applicant has made some welcome improvements compared to the original plans, in our expert opinion we do not believe they currently represent a proposition which would support the purposes the applicant envisages. On that basis, the scheme cannot justify the harm and loss of heritage that is created or the loss of ancillary land and spaces which would otherwise be necessary to support a viable venue or restorations in future. We are keen for the applicant to be successful. We urge further revision and submission of additional information before we would be able to remove previous objections and support the granting of planning permission and listed building consent.

At a high level if the following changes and submissions were provided we could support this scheme:

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- Demonstration of a realistic programme for the Hippodrome and business plan which could be viable, informed by the engagement of an experienced and specialist consultant with appointment of an operator.
- Further improvement of back of house facilities and function.
- Deficiencies with regards to accessibility to have been rectified.
- Improvement of front of house provision particularly in relation to bar space.
- Submission of a realistic Transport and Servicing Plan which reflects the needs of the anticipated programme.
- Submission of additional information and justification for heritage impacts.

If, however, the Council is minded to grant permission for this scheme, there are a number of planning conditions which would be necessary to ensure delivery of a functional and viable venue within the auditorium and to adequately record loss of historic fabric and features. We can advise the Council on these further based on successful examples elsewhere. We suggest these include:

- Appointment of a credible venue operator prior to commencement of development.
- Works on the venue to be completed prior to full occupation and operation of commercial elements.
- Implementation of a recording condition in relation to parts of the building which will see total loss or loss or harm to fabric and historic features.

We wish for the applicant's scheme to be successful and we are keen to help make these plans work. We remain open to positively engaging with the applicant, the Council and other key stakeholders to find a way forward.

A handwritten signature in black ink that reads "T Clarke".

Tom Clarke MRTPI  
National Planning Adviser

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