

# Planning Committee

30 March 2022



<b>Title</b>	To consider the Local Listing of the former Debenhams Building, Staines - upon – Thames.
<b>Purpose of the report</b>	To make a decision
<b>Report Authors</b>	Esmé Spinks, Planning Development Manager Russ Mounty, Principal Planning Officer
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	N/A
<b>Corporate Priority</b>	Community Environment Service delivery
<b>Recommendations</b>	<b>Planning Committee is asked to:</b>  Agree the report and add the Debenhams building to the Local List of Buildings and Structures of Architectural or Historic Interest with immediate effect.
<b>Reason for Recommendation</b>	The former Debenhams Building, Staines - upon – Thames has been identified as a building worthy of being Locally Listed.

## 1. Summary of the report

- 1.1 The report sets out the process of locally listing a building and whether it is considered the former Debenhams Building, Staines - upon – Thames is worthy of being placed on Spelthorne's Local List. The officer recommendation is that the building should be added to the local list with immediate effect.

## 2. Background

- 2.1 On 19/11/2022 planning application 21/01772/FUL was submitted for the redevelopment of Debenhams for mainly residential purposes. The application details are:

Demolition of the former Debenhams Store and redevelopment of site to provide 226 Build-to-Rent dwellings (Use Class C3) and commercial units (Use Class E) together with car and cycle parking, hard and soft landscaping, amenity space and other associated infrastructure and works.

- 2.2 This application is currently being processed and will be brought before the Planning Committee for determination in due course.

- 2.3 The LPA has received a number of comments over the importance of the Debenhams building within the street scape and its historic association with the architect George Coles. On 15 December 2021 Historic England (HE) advised the LPA of its decision on whether to statutory list the Debenhams building. The full response to the request is set out below:

*“Historic England has received two applications asking us to assess Debenhams department store in Staines-upon-Thames, for listing. We have also received communications of support for the building’s listing from three community groups: Staines Town Society, Riverside Residents (Staines) Coalition and Riverbank Residents, as well as a petition of over 1,000 signatures against demolition. The store closed in 2020 and there are proposals for redevelopment of the site for housing and retail. The building is not in a conservation area and is not locally listed.*

*Originally built for local department store, Kennards, the building was constructed in two phases between 1956-1957 and 1961-1962. The design was by George Coles (1884-1963), known for his work designing cinemas for the Odeon cinema chain, several of which are listed at Grade II. The Kennards store replaced a number of smaller units on the site to occupy a prominent corner of Staines High Street. Adopting a late neo-Georgian style, it is faced in red brick with stone, or reconstituted stone, dressings and windows are steel-framed multi-paned casements. Externally the building appears little altered, with the exception of a later canopy, signage and renewed entrance doors.*

*Based on the information provided and with reference to the Principles of Selection (November 2018) and Historic England’s Selection Guides, Debenhams, High Street, Staines-upon-Thames, is not recommended for listing for the following principal reasons.*

*Degree of Architectural interest:*

*\* the building is a late example of neo-Georgian retail architecture and, despite the interest of its architect, is comparable in quality to a very large number of high street buildings of the inter- and post-war period across the country; it does not possess the quality of design, decoration or craftsmanship to mark it of special architectural interest. Historic England Reject at Initial Assessment Report 15 December 2021 Page 2 of 2 Degree of Historic interest:*

*\* department stores are an important part of the country’s retail heritage, and they are increasingly under threat; however, only those with the greatest claims to interest will merit addition to the statutory List.”*

The Council's own historic design adviser did not consider the building met the criteria to be statutory listed and therefore officers did not seek a listing from Historic England.

- 2.4 As part of the consideration of the current planning application, the Debenhams building is being assessed as a non-designated asset (i.e., a building which has a degree of significance but does not meet the criteria to be statutory listed). Officers have also been assessing whether the building is worthy of locally listing. A number of councillors, local residents groups and individual residents have formally requested for the building to be locally listed. Under the Council's standing orders, this is a matter which requires a decision from the Planning Committee.

### 3. **Planning Considerations**

#### Policy Guidance

- 3.1 The National Planning Policy Framework (NPPF) defines a heritage asset as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets are of two types: 'designated heritage assets', and 'non-designated heritage assets'. Designated heritage assets are largely designated nationally under the relevant legislation and include listed buildings and scheduled monuments. Non-designated heritage assets are locally-identified 'buildings, monuments, sites, places, areas or landscapes identified by plan making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets' (PPG). There are a number of designated and non-designated assets in Spelthorne.
- 3.2 Historic England provides detailed guidance on locally listed buildings. It advises that

*"they may be offered some level of protection by the local planning authority identifying them on a formally adopted list of local heritage assets.....In deciding any relevant planning permission that affects a locally listed heritage asset or its setting, the NPPF requires amongst other things that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. LPAs should take account of heritage assets and the desirability of putting them to viable uses consistent with their conservation. They are also obliged to consider the positive contribution that conserving such heritage assets can make to sustainable communities including their economic vitality. The NPPF contains policies that apply to heritage assets regardless of whether or not they are locally listed. However, local listing provides a sound, consistent and accountable means of identifying local heritage assets to the benefit of good strategic planning for the area and to the benefit of owners and developers wishing to fully understand local development opportunities and constraints. Local listing does not affect the requirements for planning permission. Some buildings can be demolished without planning permission and local listing does not affect that..."*

- 3.2 The Council adopted its local list in February 2004 and it was updated in December 2016. Current adopted planning policy EN5 is responsible for protecting the borough's buildings of architectural and historic interest. Policy EN5 e) states that Spelthorne's architectural and historic heritage will be preserved by:

*"d) encouraging the retention of buildings of local architectural or historic interest and seeking to ensure that their character and setting is preserved in development proposals".*

- 3.3 The National Planning Policy Framework (NPPF) advises at para 203 *"the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

- 3.4 Guidance on identifying and conserving local heritage is set out in HE's Advice Note 7. The note outlines the importance of the criteria for defining the scope of the local heritage site. The Council's current local list has the following criteria:

(a) Structures of architectural quality

(b) Contributors to the urban scene

(c) Items of historic interest include buildings or structures historically associated with famous people, events or places.

Within sections (a) and (b), there are a number of subsections for further detail and analysis.

#### Assessment by Council's Historic Advisor

- 3.5 The Council's Historic Advisor has assessed the Debenhams building in accordance with the Council's local listing criteria. The detailed criteria is set out below together with the advisor's comments (in italic script) on each.

**(a) Structures of architectural quality include:**

- i) Buildings or structures of locally perceived quality and character – this item establishes that there must be a place for entries outside any easily definable category. These would need their own special justification.

*Setting aside issues of architectural merit and detailing, the former Debenhams Store's location on a prominent town centre corner, its height and mass and curved footprint following the line of Thames Street give it landmark status. It makes a positive contribution to the adjacent Staines Conservation Area and by its form and scale, the setting of numerous listed and locally listed buildings in the vicinity.*

- ii) All buildings from before 1700 and most buildings from before 1840 – the amount of surviving building fabric would be a material factor. Early origins, if not now clearly expressed in the character of the building, would not in themselves justify listing.

*The Former Debenhams Building does not relate to this category.*

- iii) Substantially complete and well-preserved examples of good 19th Century and early 20th Century buildings (to 1914).

*The former Debenhams Building does not relate to this category*

- iv) Other buildings up to 1950 identified against the criteria – this cut-off date would not exclude more recent buildings if they have sufficient indisputable qualities.

*This building was constructed as a purpose-built department store in 1956. The quality of this building largely relates to its form, scale, strong local character and sympathetic design, as recognised by the applicant's Heritage Statement which notes "that it enhances the townscape through its choice of materials and sympathetic design". It was the largest building in Staines town centre at the time.*

- v) Buildings or structures by notable national or local architects or designers.

*This building was designed by London based architect George Coles. It is four storeys in height in fine red brickwork in the neo-Georgian manner plus a prominent ground floor of continuous display windows under a projecting canopy. The main entrance is on the splayed corner of High Street and Thames Street, visible from a distance along Clarence Street. Its main quality lies in its polite and restrained aesthetic which relates well to the scale and grain of the numerous heritage asset buildings in High Street, Clarence Street, Church Street and The Old Town Hall Square. It makes a major contribution to the special character of the adjacent Staines Conservation area.*

- vi) Grand domestic buildings and institutions.

*The former Debenhams Building does not relate to this category.*

- vii) Buildings or structures which exemplify craftsmanship in the working of materials or an innovative use of materials or technology.

*The former Debenhams Building does not relate to this category.*

- viii) Un-common building types and styles.

*The former Debenhams Building does not relate to this category.*

**(b) Contributors to the urban scene include:**

- i) Well designed buildings or structures which frame or characterise valuable vistas and spaces.

*This building stands on a prominent site in the centre of the town and forms the corner between High Street, (The former Roman Road) and Thames Street. It is also an imposing element when viewed from the conservation area, Church Street and Clarence Street. Using a strong horizontal form it employs a well ordered neo-Georgian style which is entirely in keeping with the small grain of the surrounding buildings in the Staines conservation area, including the Georgian frontages of Clarence Street. When viewed from The George Public House, it forms a clear group with the Grade II\* Blue Anchor, Cygnet House, the Old Town Hall, both listed Grade II.*

- ii) Building groups, including groups or terraces of identical buildings, which help form an attractive local character.

*This building is not part of a group or terrace of buildings of identical character.*

- iii) Decorative facades which enrich the street scene.

*The subtle curve of this building, reflecting Thames Street, and the warm red brickwork and closely spaced windows of Georgian proportion enrich the street scene and the adjacent conservation area.*

- iv) Buildings with a strong local character being uniquely adapted to their site.

*This building is uniquely adapted to the curve of Thames Street and the prominent corner location. It is clearly of strong local character, as identified by the Heritage Statement. It is a major contributor to the setting of the Staines Conservation Area.*

**(c) Items of historic interest include buildings or structures historically associated with famous people, events or places.**

*Insofar as the former Debenhams Store was the first purpose-built department store in Stains, built in 1956 for Kennards (a Debenhams subsidiary) and formerly re-named Debenhams in 1973, it displays a degree of local commercial history.*

- 3.6 The Council's Design Advisor comments that of itself, the building is not architecturally or historically of exceptional quality. It is however of prominent and landmark interest due to its location, size, and position at the boundary of the conservation area. This of itself does not make it reach the standard required. It is the combination of a number of small factors which, taken together, just brings it to the level required. Such things as urban scale, relating well to other buildings in the vicinity, its pleasing,(if not exceptional) appearance, it being a 'polite' neighbour to the other small scale heritage assets close by, its strategic location on the junction, being designed by a London architect known for his design of large town centre buildings such as cinemas and departmental stores, being purpose built as a department store

remaining in that use until last year, the largest building in the town centre in 1956. Individually these items would not qualify but taken together they do, in his opinion, provide a degree of local interest which could now justify Local Listing. The consultees on the planning application to redevelop the site; Historic England, the 20th Century Society and Save Britain's Heritage all agree with this analysis.

- 3.7 The Historic Advisor comments further that HE's Advice Note 7 makes clear that the receipt of a planning application can legitimately trigger the detailed examination of a building proposed for demolition, as to its suitability for statutory or local listing. The Advisor concludes by stating that in the light of the above, the Debenhams building meets a number of the criteria for it to be included on the Spelthorne's Local List.
- 3.8 Advice note 7 advises that *"particular attention should be given to responses received from the owners of assets as these will assist in developing future management strategies. Although there is no statutory requirement to consult owners before adding an asset to the local list, inviting comment may provide information that is important for understanding its significance. The responsibility for assessing any requests not to list could fall to the selection panel or local authority staff, but it is important that a procedure is put in place for handling requests from owners not to designate, and this procedure adequately publicised."*

#### Applicant's Comments

- 3.9 Despite there being no statutory requirement to consult with the owner of Debenhams, it was considered best practice to do so. On 14/02/2022, the applicant's planning consultant was advised of the comments made by the Historic Advisor and was given 21 days to respond. The owner's consultant responded and the comments received are set out in full below.

#### **Previous Local Listing Assessments**

It should be noted from the outset that local listing exercises were carried out by Spelthorne Borough Council during 2004 and 2016. On both occasions, the former Debenhams store was found not to be worthy of inclusion on the local list. The 2004 Local List of Buildings and Structures of Architectural or Historic Interest document states that expert advice was considered during the preparation of the local list.

It appears from the previous assessments that the Council has been conscious of the importance of setting an appropriate standard which can be consistently applied and is sufficiently broad in the range of architectural or historic importance which is reflected in the list. At the same time it has sought to ensure the standard is not too low and at risk of including structures of more limited quality which might devalue the status of the list.

As the standards have been consistently applied across both local listing exercises, there would need to be justification should an alternative result be concluded in terms of inclusion following the current assessment.

#### **(a) Structures of Architectural Quality:**

The Council's assessment states that the building positively contributes to the adjacent Staines Conservation Area as well as the setting of a number of listed and locally listed buildings in proximity.

The heritage statement submitted in support of 21/01772/FUL {proposed redevelopment of the site} acknowledges that the former Debenhams building is in the vicinity of the assets and considers the potential effect of development on the surrounding assets. The statement concludes that the proposed development will only result in 3 instances of moderate effect and an overall negligible effect on the attributes of the setting of other identified designated and non-designated heritage assets. It is further summarised that the proposed development will have a negligible effect on key viewpoints of the designated and non-designated heritage assets within the Staines Conservation Area and Egham Hythe Conservation Area. Whilst the former Debenhams Building may be within the vicinity of the Conservation Area, it does not contribute to the special significance of the heritage asset. If the building made a notable contribution to the significance of the Conservation Area, the Conservation Area boundary would have been previously reviewed and amended accordingly to include the buildings.

The local listing assessment states that the building was constructed as a purpose-built department store in 1956. The assessment further states that the building was the largest within Staines town centre at the time of construction. As stated within the Local List of Buildings and Structures of Architectural or Historic Interest document (2004), the presence of an historic fabric is one of the key requirements for listing. As the building was constructed within 1956, it falls outside of the historical cut-off date specified at roman numeral point iv ( of part a) (1950) within the Council's assessment.

Although buildings falling outside of the historical cut-off date can still be considered for assessment, their historical significance is not deemed as important as those constructed within the stated historical brackets. The heritage statement prepared to accompany the planning application concludes by stating that the former department store holds low illustrative historical value. It is acknowledged that the building was the largest in the town centre at the time of construction. However, given the recent and emerging development in the town, the massing and scale of the former Debenhams building can no longer be considered significant in terms of the town centre's character. It is therefore considered that the points discussed do not justify the buildings inclusion on the local list.

In considering the architectural merit of the building, viewpoints should be considered from all public vantage points, and not only the Conservation Area. The area to the south east of the site is subject to regeneration, as set out in the Local Plan, and as per the recently approved appeal for the former Masonic Hall site. The south and east elevations of the former Debenhams



building are functional, unattractive and are not of merit. These elevations will become more prominent as the potential of the regeneration of adjoining land develops and will have a growing adverse effect on the area, which must be considered.

Furthermore, the criteria states that they can be included, if constructed after the cut-off date of 1950 'if they have sufficient indisputable qualities'. The Council's assessment does not provide evidence of 'sufficient indisputable qualities' and makes a generic statement in relation to the form, scale and strong local character and sympathetic design.

**(b) Contributors to the urban scene:**

The assessment states (at b iv) that the former department store is clearly of strong local character as identified by the heritage statement. It further argues that it is a major contributor to the setting of the Staines Conservation Area.

The submitted heritage statement does not acknowledge the building as having a "strong local character" but concludes that the former Debenhams store holds low aesthetic value. The building has been submitted to Historic England on two occasions to be considered for listing but was deemed unworthy on both instances following initial assessment. One of the main reasons was that the building does not possess the quality of design, decoration or craftsmanship to mark it of special architectural interest. In consideration of the assessments conducted by Historic England on two occasions and the conclusions made within the heritage statement, the former Debenhams store cannot be considered to have a strong local character. Furthermore, it cannot be acknowledged as a major contributor to the setting of the Staines Conservation Area when it is located outside of the area. As noted above, if it were a major contributor to the Conservation Area, the boundaries would have previously been reviewed and amended accordingly so that it was located within the Conservation Area, and/or the building would have been included on the local list.

Also, as noted above, in considering the contribution to the urban scene, the adverse effects of the rear of the building on the urban scene should be acknowledged.

**(c) Items of historic interest include buildings or structures historically associated with famous people, events or places:**

Although the building was the first purpose built department store in the Staines, this is not of any historic significance.

**The Local List criteria and selection process:**

As outlined within the local listing assessment, the building meets the requirements of only a limited number of considerations and the degree of compliance with the considerations is questionable. The building is not considered relevant for consideration when assessed against a significant number of the assessment criteria. As stated by the 2004 Local List of

Buildings and Structures of Architectural or Historic Interest document, it is not intended that buildings in every category in the criteria should be included on the list as absolute quality is important. The criteria only provides the basis against which inclusion of a building on the local list is assessed.

Many of the assertions made in the Council's assessment are exaggerated, and conflict with the assessments in the Heritage Statement submitted as part of the application, as well as the previous Historic England reviews and the local listing reviews. It should not be considered that the building meets the basis of assessment for inclusion on the local list.

It is argued that the former Debenhams building does not sufficiently meet either of these requirements to justify a local listing and the Council has not provided any evidence, prepared by a suitably qualified professional, that would support an alternative view to the previous assessments for local listing.

#### Further comments by Council's Historic Advisor

- 3.10 In response to the applicant's comments, the Council's Historic Advisor has commented further as follows:

Historic England's Advice Note 7, indicates that the receipt of a planning application may trigger an assessment (or reassessment) of a building's character or contribution to an area. In this case additional information came to light about the history of the building as the first departmental store in Staines in the mid-20th Cent. by the trading forerunner of Debenhams, its townscape scale, its architect, and the fact that it has remained in the same use until very recently is pertinent to any reassessment.

- 3.11 Under the assessment (a) it was noted that the building is clearly within the visual influence of the Staines Conservation area, made a contribution to the setting of the conservation area and formed a setting for a number of Grade II listed and locally listed buildings in the close vicinity. Its position on a prominent corner enabled its considerable townscape presence to be visible from a number of vantage points within the conservation area. This is supported by Historic England, the 20th Cent. Society and Save Britain's Heritage.
- 3.12 It is the building's considerable number of minor points of interest which, taken together form a persuasive argument for the Local Listing of this building. Finally, it should be noted that the Council's advisor has extensive qualifications and experience in historic building conservation.

#### **4. Recommendation**

- 4.1 It is recommended that the Debenhams building is added to the Local List of Buildings and Structures of Architectural or Historic Interest with immediate effect.