

Heritage Appraisal

Project name: Staines Conservation Area – South of High Street
Author: GS
Date: 23rd June 2022
Project number: P22-1667

1. Introduction

- 1.1. This note considers the proposed extension to the Staines Conservation Area, specifically the area immediately south of High Street, shown below at Plate 1. It has been commissioned by Future High Street Living (Staines) Ltd, and forms a representation on their behalf.

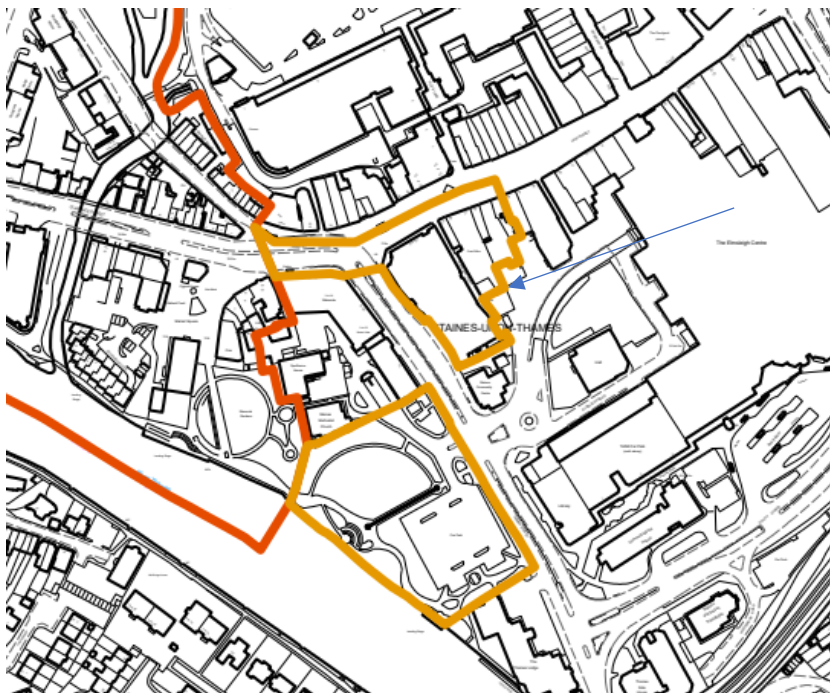


Plate 1 Area of proposed extension south of High Street, marked with a blue arrow

- 1.2. This note has reviewed the proposed boundary alterations and the Draft Appraisal, which considers the area in question. Considering these matters, it is an **objection** to the extension of the boundary.

2. Background and Statutory Duty

2.1. Section 69 of the 1990 Planning (Listed Building and Conservation Areas) Act states

“Designation of conservation areas

(1) Every local planning authority—

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

(b) shall designate those areas as conservation areas.

(2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly.

(3) The Secretary of State may from time to time determine that any part of a local planning authority’s area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

(4) The designation of any area as a conservation area shall be a local land charge.”

2.2. As such, it is clear that for an area to be designated as a Conservation Area or part thereof, it must hold special architectural or historic interest, with this relating to character and appearance.

2.3. Historic England have published guidance on Conservation Areas, *Conservation Area Designation, Appraisal and Management* (2019).

2.4. This guidance reiterates at paragraph 15 the caution given to local planning authorities in the NPPF (paragraph 191 therein) to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest.

2.5. At paragraph 68 the guidance states:

“An important aspect of the appraisal (and review) process will be considering where the boundaries should be drawn (and whether the boundaries of an existing conservation area should be re-drawn). An explanation of why the boundary is drawn where it is (or extensions are suggested, in the case of existing conservation areas), and what is included and what is excluded, is helpful. The position of the conservation area boundary will, to a large degree, be informed by the considerations identified in paragraphs 75–76 (Finalising, reviewing and publicising the boundary). As spaces contribute to enclosure, as well as framing views of assets and defining settings, a unified approach is desirable to their

management as well as suggesting that in almost all situations the conservation area boundary runs around rather than through a space or plot. It will generally be defined by physical features and avoid for example running along the middle of a street, though including the boundary wall of a property which is otherwise not included can in itself cause problems when applying conservation area policies in development management decisions."

2.6. Paragraph 72 of the HE guidance states:

"Suitability for designation

The different types of special architectural and historic interest which have led to designation include;

- *areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations*
- *those linked to a particular individual, industry, custom or pastime with a particular local interest*
- *where an earlier, historically significant, layout is visible in the modern street pattern*
- *where a particular style of architecture or traditional building materials predominate*
- *areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest."*

3. Draft Appraisal

3.1. With regards to the proposed extension covering the Former Debenhams Building and adjacent properties, the Draft Appraisal makes the following mentions of the area and structures.

3.2. Under the 'Key Elements' section (page 4), the following bullet point is included:

"Important civic and commercial buildings including the Town Hall, Fire Engine Shed Staines West Station, War Memorial and Debenhams building etc.. reflecting civic pride in the 19th and 20th centuries;"

3.3. Under the discussion of Clarence Street on page 29, it states:

"Views along Clarence Street from west to east are terminated by the former Debenhams building. This building shares many of the features characteristic of the historic buildings in this Character Area in terms of scale, string rhythm, architectural language and detail and reinforces those characteristics. For these reasons, and due to the fact that it forms a

landmark termination to those views, it contributes positively to the street scene and the character and appearance of the Conservation Area."

3.4. Under the Memorial Park section of the appraisal on page 34, it states:

"The former Debenhams building is clearly visible from Thames Street and the from the carpark on Thames Street, adjacent to Memorial Park. The view from the Thames Street shows the long and undulating side elevation of the Debenhams building which is not visible from Clarence Street. It shows another aspect of the high architectural quality of this large building that influences so much of the Conservation Area;"

3.5. Under the 'Inclusions' section on page 35, it states:

3.6. *"The four storey, former Debenhams building was built in 1956 by George Coles, the renowned art Deco architect. This landmark building is an important building of high visual quality which terminates the long views along Clarence St and from Thames Street. It is of good architectural quality and it reinforces the historic built character of character area 3."*

3.7. A list of Assets is given as Appendix 2 of the Draft Appraisal. This includes the Former Debenhams building, which is categorised as being of Local Note.

3.8. There is no description of the buildings north-east of the former Debenhams at 47-57 High Street, and no rationale for their inclusion in an expanded Conservation Area is provided.

4. Historic England Appraisal

4.1. Of relevance is a recent consideration of the architectural and historic interest of the Former Debenhams Building by the Historic England Designation Team. They describe the building as follows:

"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."

4.2. As part of their assessment they, considered the architectural and historic interest of the building. It should be noted this assessment is given as a brief summary – it is clear that the building came nowhere close to being considered of Listable quality. Should it have been a more marginal case, a fuller assessment would have been prepared. Rather the following assessment was given:

"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.*

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."*

5. My Assessment

- 5.1. I concur with the assessment of significance given by Historic England with regards to the architectural and historic interest of the Former Debenhams Building. The architectural interest of the structure is of a very common level, and it is not of special architectural or historic interest.
- 5.2. With regards to the association with Coles, not every building by a named or even celebrated architect will be of special interest, as is the case here. The Former Debenhams Building has neither a striking overall design nor playful or exquisite detailing of his best work, examples of which have been Listed, as noted by Historic England.
- 5.3. With regards to the buildings to the north-east of the Former Debenhams Building (Plate 2), these are of no intrinsic special architectural or historic interest, nor has anyone made any case for them having such interest, including within the draft appraisal.



Plate 2 Looking south to 47-57 High Street

- 5.4. Their upper facades are of their time, and of relatively little architectural interest, with the only exception being the upper façade of 53–55, which has some Deco detailing. However, the shop frontages at ground floor level are of no architectural interest and the building is not of special interest as a whole.
- 5.5. Although the appraisal notes the Former Debenhams building as a key element, no credible justification for this is given. The draft appraisal states:
- “This building shares many of the features characteristic of the historic buildings in this Character Area in terms of scale, string rhythm, architectural language and detail and reinforces those characteristics. For these reasons, and due to the fact that it forms a landmark termination to those views, it contributes positively to the street scene and the character and appearance of the Conservation Area.”*
- 5.6. This is simply not evidenced. Firstly, the Former Debenhams and group of buildings to the north are entirely out on a limb from the main part of the character area, awkwardly joined by an isthmus along the High Street. As such, the buildings of the proposed extension area can only be part of a ‘street scene’ with one another. In this context, the Former Debenhams does not share any of the characteristics of the other buildings, in terms of scale, string rhythm, architectural language or detail (Plate 2). There is nothing to unite them.
- 5.7. Even considering the closest buildings within the character area beyond the anomalous road-wide link, the buildings on the eastern side of Market Square, such as the Grade II* Listed mid 18th-century Blue Anchor, are not comparable in any of the ‘characteristic features’ mentioned.
- 5.8. The building does have some landmark quality, and is part of the setting of the current Conservation Area. Between that consideration (provision for the consideration of which is present under the NPPF) and its locally listed status (provision also made under the NPPF), the modest heritage interest of the Former Debenhams Building is sufficiently protected in planning terms without the awkward and contrived inclusion in an extended Conservation Area.
- 5.9. References are made to ‘high architectural quality’ and ‘good architectural quality’ with regards to the Former Debenhams Buildings in the Draft Appraisal. These are contradicted by the Historic England Designation Assessment, which found it of a very common level of architectural interest.
- 5.10. The idea also put forward in the appraisal, that the Former Debenhams Building influences ‘so much of the Conservation Area’, is not the case, being in an awkwardly shaped extension to the bulk of the area.
- 5.11. Hence, the justification put forward in the appraisal, where present, is not considered to be evidenced or indeed correct.
- 5.12. Considering the examples of areas which have warranted Conservation Area designation, given in Historic England’s guidance (paragraph 72 of the guidance, bullets below), I do not consider that the Debenhams extension is justified (my comments following the bullets in italics).
- areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations. *This is not the case for the*

proposed Debenhams extension. Only one locally Listed building lies within the area.

- those linked to a particular individual, industry, custom or pastime with a particular local interest. *The buildings are retail structures in a wider retail area. This is insufficient to engender a particular local interest.*
- where an earlier, historically significant, layout is visible in the modern street pattern. *This is not the case here. The roads have been widened, and no special interest lies in their layout.*
- where a particular style of architecture or traditional building materials predominate. *As discussed above, there is no unifying architectural style within the group.*
- areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest. *There is no open space of particular interest in the proposed area of extension.*

5.13. I consider that the streetscape formed by the group of buildings proposed for designation in this area is of generic interest for such an area with regards to the frontages, lacking special architectural interest, and of no interest in terms of overall form in plan and rear elevations. The area lacks the special architectural interest that would warrant its designation as a Conservation Area or part thereof.

5.14. Furthermore, it is noted that the boundaries of the proposed designation area run through the middles of streets, contrary to Historic England guidance on designation.

6. Conclusions

6.1. In conclusion, the justifications for the extension included in the Draft Appraisal are variously incomplete (making no mention of buildings north-east of the Former Debenhams Building), incorrect (stating that the Former Debenhams Building shares characteristics of the streetscape of the character area), contrary to independent assessment (asserting that the Former Debenhams Building is of high architectural interest, when Historic England found it to be of a very common level of interest) and without consideration of whether existing designations covering and in the vicinity of the area in question adequately provide for the interest of the area in planning terms.

6.2. The area proposed lacks the requisite special interest, and its inclusion within the Staines-upon-Thames Conservation Area would devalue the asset as a whole, in contradiction of Historic England guidance and the NPPF.

Heritage Appraisal

Project name: Staines Conservation Area – Memorial Gardens
Author: GS
Date: 23rd June 2022
Project number: P22-1667

1. Introduction

- 1.1. This note considers the proposed extension to the Staines Conservation Area, specifically the Memorial Gardens area, shown below at Plate 1. It has been commissioned by Future High Street Living (Staines) Ltd, and forms a representation on their behalf.

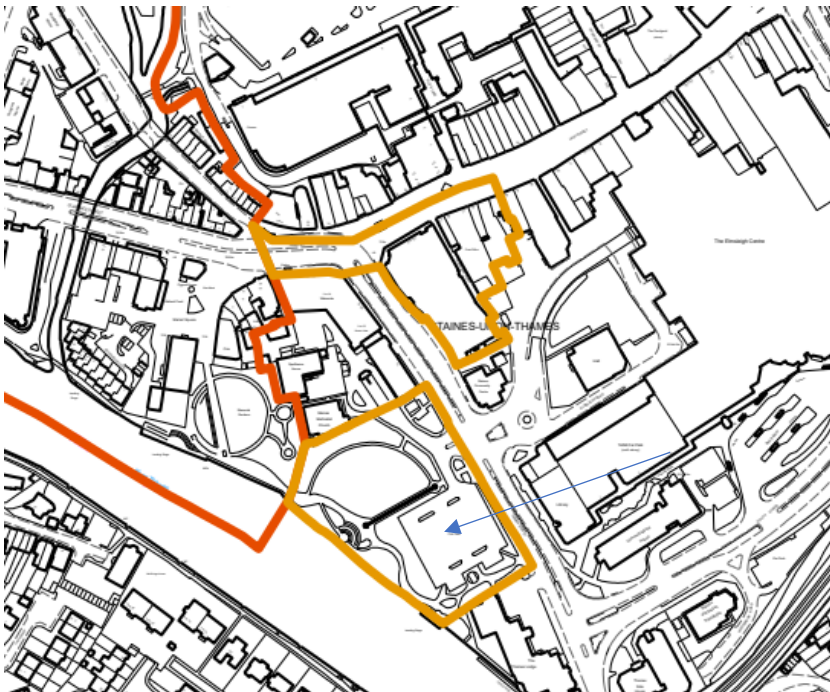


Plate 1 Area of proposed extension at the Memorial Gardens, marked with a blue arrow

- 1.2. This note has reviewed the proposed boundary alterations and the Draft Appraisal, which considers the area in question. Considering these matters, it is an **objection** to the extension of the boundary.

2. Background and Statutory Duty

2.1. Section 69 of the 1990 Planning (Listed Building and Conservation Areas) Act states

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(3) The Secretary of State may from time to time determine that any part of a local planning authority’s area which is not for the time being designated as a conservation area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a conservation area.

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physical features and avoid for example running along the middle of a street, though including the boundary wall of a property which is otherwise not included can in itself cause problems when applying conservation area policies in development management decisions."

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- *areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest."*

3. Draft Appraisal

3.1. With regards to the proposed extension covering the Memorial Gardens, the draft appraisal makes the following references to the Memorial Gardens or elements therein:

- *The Summary of Key Elements includes a reference to "the high number of valuable trees and specimen trees, particularly in the St Mary's Church Character Area and along the Thames."*
- *"Between 1871 and 1880 the Town Hall was constructed. This involved the demolition of the existing market house and a number of buildings to the east of the current Town Hall which created the Market Square and made space for the Memorial Gardens which were laid out in 1897." (Page 8)*
- *The Memorial Park is noted as being one of five significant open areas within the Conservation Area (Page 14): "The Memorial Park was the original home of the War Memorial. This is an attractive, open, riverside park which allows for an appreciation of the river and a different perspective of the town that is not obtainable from the urban core. Formally planting provides structural shape to the park whilst informal tree areas along the bank of the Thames adds greenery to this urban area."*

- The Memorial Park is discussed on pages 32–34 of the Market Square and Memorial Gardens Character Area Assessment, which states:
 - *"The river is most appreciable from within the Memorial Park where attractive views across it to The Hythe. Development on the southern bank impacts directly on the character of the Conservation Area due to its visibility from the northern bank;*
 - *The park is an attractive open space and one of the few spaces within the Conservation Area where the river is clearly evident. The width, power and importance of the river are celebrated, within the park. The park has significance for that reason alone but also for its social and evidential value as it was created as a memorial to the men of the town who gave their lives in the first World War;*
 - *The car park to the east of the Memorial Park is an integral part of the landscaping and open space that allows wide, uninterrupted views of the river to be obtained and appreciated;*
 - *Memorial Park makes a fitting setting for the public art which it contains;*
 - *The former Debenhams building is clearly visible from Thames Street and the from the carpark on Thames Street, adjacent to Memorial Park. The view from the Thames Street shows the long and undulating side elevation of the Debenhams building which is not visible from Clarence Street. It shows another aspect of the high architectural quality of this large building that influences so much of the Conservation Area;"*
- The proposed inclusion section (p35) states *"The Memorial Park; the park and adjacent car park have been included in its entirety because of the importance that this high quality open space has within the character area and also as one of the few public, open spaces from where a full appreciation of the river Thames and its relationship to Staines town can be obtained."*

4. My Assessment

- 4.1. Whilst the Memorial Gardens were laid out to commemorate those fallen in the First World War, the War Memorial has now been moved to the Market Square. The gardens still hold a low level of historic interest due to their origins, but in the light of their modern character and absence of the memorial, I do not consider that they hold the requisite special interest that would justify their Inclusion in the Conservation Area. The green space is not considered to be an essential component of a wider historic area, and it is not considered to be a *historic* park or garden in current character and appearance.
- 4.2. I can understand the desire to preserve views to the Thames across them, but inclusion in a Conservation Area should be on the basis of intrinsic special interest.
- 4.3. The inclusion of the car park and road junction is entirely unreasonable and goes directly against the caution in the NPPF of devaluing any given area, as they are clearly areas the character and appearance of which is of no special interest.
- 4.4. Likewise, the justification for the inclusion of the car park given in terms of the views to the Former Debenhams is unreasonable. Even if these views were to be considered to be important (and it should be noted that Historic England consider the building to be of a

very common level of interest), inclusion should be on the basis of intrinsic architectural and historic interest, which the car park clearly does not hold.

5. Conclusions

- 5.1. The area proposed lacks the requisite special interest, and its inclusion within the Staines-upon-Thames Conservation Area would devalue the asset as a whole, in contradiction of Historic England guidance and the NPPF.