

Staines Conservation Area Appraisal

Response to the objection of Gail Stoten, Pegasus Group on behalf of Future High Street Living (Staines) Limited

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1.0 Introduction

1.1 This document has been prepared by Dr Carole Fry in response to the submissions made by Gail Stoten of Pegasus Group on behalf of Future High Street Living (Staines) Limited, who wish to redevelop the site. The note was an objection to the recent Draft Conservation Area Appraisal proposed for the Staines Conservation Area.

1.2 Dr Carole Fry of AHC Consultants was and is the lead Consultant on this project and has nearly 30 years' experience in the field. However, it should be noted that there were in total **three** independent assessors of the Draft Conservation Appraisal for Staines, all of whom carried out joint site visits and all of whom reached the same conclusions regarding the proposed extension of the Conservation Area to the south. The other assessors were Mrs Freya Morris, who was the Conservation Area Appraisal and Designation Officer for Aylesbury Vale District Council for 15 years and who has 25 years' experience in the field and Mrs Rachel White, the ex-Head of Conservation at Winchester City Council and who also has almost 30 years' experience.

1.2 The objection by Gail Stoten of Pegasus relates specifically to the proposed extension of the Conservation Area which includes the Debenhams building and the green space, Memorial Gardens.

2.0 Policy Context and Discussion

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

“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 Historic England has published guidance on Conservation Areas entitled:

“Conservation Area Designation, Appraisal and Management: Guidance Note 1”, which was revised 8 February 2019.

This document has been referred to by the Pegasus Group in their objection but has omitted many paragraphs of advice that have shaped the Draft Appraisal and which help to explain the reasoning for the proposed inclusion of the southern extension of

the Conservation Area. These paragraphs are set out below and the reasoning provided.

2.3 *“Conservation Area Designation, Appraisal and Management: Guidance Note 1”* summarises the duties of Local Planning Authorities in the following terms:

“Conservation Area requirements under the Planning (Listed Buildings and Conservation Areas) Act 1990:

- *Local planning authorities to determine areas which it is desirable to preserve and enhance, and designate them as conservation areas (section 69 [1]);*
- *Local planning authorities to review their past activities in this area, including existing conservation areas, and to add more conservation areas (section 69 [2]) ;*
- *Local planning authorities to formulate and publish proposals for the preservation and enhancement of conservation areas and consult the public in the area in question, taking account of views expressed (section 71 [1 and 2]);*
- *In the exercise by local planning authorities of planning functions within the conservation area ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’ (section 72 [1])”.*

2.4 This 2019 Guidance Note then goes on to include advice which has been followed in the production of the Draft Appraisal for Staines. This is as follows:

“Though some conservation areas are made up largely or even entirely of twentieth century development (eg Letchworth and Welwyn Garden City), the twentieth century is often the most undervalued and vulnerable period of building and landscaping and it will be important for the appraisal to recognise, where appropriate, the contribution made by more recent buildings” (para 35).

The Debenhams Building is a twentieth century landmark building of 1956 and is considered to make a positive contribution to the Conservation Area: this is one of several reasons for its inclusion in the Draft Appraisal.

2.5 The Guidance also states that, *“.....set out the features of the area that contribute to its special architectural interest.whether as a collection of buildings representing a range of uses that document the area’s history, that represent the impact of a particular*

architectural vision for the area, as a townscape or with materials and features that are special because of their contribution to local distinctiveness and identity. Surviving or former uses within the area might also have influenced plan form, urban grain and building types, for example grand terraces with mews, villas set in generous gardens, workers' back-to-back housing or industrial buildings connected with particular activities, local trades or specialised markets". (Para 46).

The large size, footprint, scale, height and position of George Cole's Debenhams building is such that it has a strong influence on the townscape of Staines. It is a very noticeable landmark building, terminating several key views and shaping the town centre. Added to this, its former use as mid-century Department Store represents a former, historic use of this part of the town. For both these reasons, and following Historic England's Guidance, it is considered worthy of consideration for a place in the Conservation Area.

2.6 Historic England Guidance goes on to state that:

"Most of the buildings in a conservation area will help to shape its character. The extent to which their contribution is considered as positive depends not just on their street elevations but also on their integrity as historic structures and the impact they have in three dimensions, perhaps in an interesting roofscape or skyline". (Para 48) and...

"Whilst designated status (i.e. nationally listed) or previous identification as non-designated heritage assets (such as through local listing) will provide an indication of buildings that are recognised as contributing to the area's architectural and possibly historic interest, it will be important also to identify those unlisted buildings that make an important contribution to the character of the conservation area". (Para 48)

These paragraphs are important because it makes it clear that the three-dimensional presence of a building in the streetscape (its scale, size, mass, height and enclosing qualities) can be important to the special character and appearance of a Conservation Area. It is also clear that there will be unlisted buildings which make an important contribution to the Conservation Area. This guidance is highly pertinent to the Debenhams building which is an unlisted building which contributes to the Conservation Area.

2.7 The Pegasus objection appears to contain a fundamental misunderstanding of the term 'special interest' and how it relates to Conservation Areas, in their assessment of the Debenham's building. In their note they refer often to Historic England's decision not to include the building in the national *List of Buildings of Special Architectural or Historic Interest*. We are in complete agreement with Historic England's assessment that the Debenhams building is not of sufficient architectural or historic interest to be listed. However, this has no relevance in considering whether it should be included within the Staines Conservation Area, which is a completely different Heritage Asset with completely different parameters for designation. The existing Staines Conservation Area, as with almost all Conservation Areas nationwide, has many unlisted buildings which contribute to the special character and appearance of the Conservation Area (and many that are either neutral or even detrimental to) the special character and appearance of the Conservation Area.

2.8 It is very important to note here that buildings are **not** required to be listed in order to be included in Conservation Areas and can, of course, be considered worthy of contributing positively to the special character and appearance of the Conservation Area without being listed or even locally listed.

2.9 Historic England has long-since devised a tool whereby it is possible to carry out an impartial assessment of a building's ability to contribute positively to a Conservation Area. This tool has been in existence for over twenty years and the current version of it is now included within the Historic England Guidance as set out in this document (Conservation Area Appraisal, Designation and Management 2019). It comprises a checklist of questions in Table 1 and is set out below.

2.10 The Table states that

*"A positive response to **one or more** of the following questions may indicate that a particular element within a conservation area makes a positive contribution, provided that its historic form and value have not been eroded".(para 49).*

This table has not been referred to in Pegasus' Note so it doesn't appear that this impartial tool has been used by them to assess whether the Debenham's building makes a positive contribution to the Conservation Area (and should therefore be considered for inclusion). This has been filled in below to set out the reasoning for its inclusion in the Draft Appraisal.

2.11 It should be noted that **6 positive answers** can be made against these assessment questions, not just one or two, which Historic England states could be sufficient to establish that a building makes a positive contribution to a Conservation Area. This is clear impartial evidence that the building, right on the fringe of the current Conservation Area boundary should be considered for inclusion.

TABLE 1

Is it the work of a particular architect or designer of regional or local note? **Yes**

Does it have landmark quality? **Yes**

Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form, or other characteristics? **No**

Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way? **No**

Does it contribute positively to the setting of adjacent designated heritage assets? **Yes**

Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings? **Yes**

Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building? **No**

Does it individually, or as part of a group, illustrate the development of the settlement in which it stands? **No**

Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature? **No**

Does it have historic associations with local people or past events? **No**

Does it reflect the traditional functional character or former uses in the area? **Yes**

Does its use contribute to the character or appearance of the area?" **Yes**

2.12 The Guidance goes on to set out that:

"This part of the appraisal describes open spaces within or immediately outside the conservation area, their enclosure, and their visual, and/or other sensory contribution to the character of the place. The relationship between public spaces (such as a market place, street, square, public garden or car park) and private space (gardens, courtyards or playing fields), the qualities they offer, such as their long and winding or wide and open character and the ways in which the spaces were and are used, and the identification of key settlement edges, are all part of this analysis". (Para 53) and

"Similarly, the amount of green space and types of planting found between areas is likely to vary based on historic use and design. Highlighting these variations between areas and their contribution to both character and appearance and historic or architectural interest is an important element of character analysis that will help to inform future decisions and help developers generate sensitive proposals". (Para 54)

2.13 The Pegasus objection note states that they do not value the open space that the designed Memorial Park makes to the Conservation Area and to the settlement edge of Staines, with its wide views across to the Thames. Their objection is based on the fact that the War Memorial itself has been relocated (very close by) to Market Square. However, the objection fails to take account of the spatial relationship and delightful axial vista, that has been designed intentionally, and that now exists between the War Memorial and Memorial Park, deliberately leading down to the River Thames. It is a piece of cleverly designed townscape which incorporates a green park and which links the open spaces of Market Square, Memorial Park and the riverside and is, in our view, worthy of designation. This need to understand and value relationships between open spaces and designed elements is set out in paragraph 58 of the guidance which specifically states that also relates to guidance:

"Heritage assets can gain significance from their relationship with their setting whilst views from within or outside an area form an important way in which its significance is

experienced and appreciated. This part of the appraisal should identify how the landscape or townscape that the area is located within contributes to its special interest, perhaps by providing approaches along historic routes or visual connections between different areas that illustrate an important historic relationship. In other cases a relationship may be part of a formal design, such as a designed view from a park or garden to a feature in the landscape beyond".

2.14 With regard to Memorial Park, views across the Thames and inclusion of the small carpark the Pegasus report states that, "I can understand the desire to preserve views across the Thames but inclusion in a Conservation Area should be on the basis of *intrinsic special interest*" (Para 4.2 of Pegasus report). Here, there seems to be a misunderstanding on the part of Pegasus of the Historic England guidance since guidance states that:

"Heritage assets can gain significance from their relationship with their setting whilst views from within or outside an area form an important way in which its significance is experienced and appreciated" (para 58)

2.15 Paragraph 59 also specifically mentions the importance of considering riverside views as well as landmark buildings such as the Debenhams building stating that:

"The following may be significant contributors to character:

- *views of rivers, the sea and surrounding hills and glimpses of landscape from urban streets open spaces, church towers and*
- *prominent public buildings that provide landmarks in views or views that illustrate a particular element of the area's historic development".*

The views to and from the Thames, from within and without Staines, are vital to understanding the significance and special character of Staines as a riverside town. The inclusion of some of these views in the Conservation Area are a valid and long-established means of preserving significance of a heritage asset as well causing the asset to be better revealed and understood. I wholly disagree with Pegasus that these

views and links to the Thames are of no intrinsic value; indeed, they provide Staines with much of its historic setting, context and value.

2.16 Pegasus has also stated that, *“The inclusion of the carpark and road junction is entirely unreasonable”*. Again, there seems to be a misunderstanding of the importance of preserving the open views from and to the townscape to the riverside. The Draft Conservation Appraisal sets out the reasoning for the inclusion which is included again here for ease:

“The Memorial Park; the park and adjacent carpark 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” (p.35).

This will ultimately be a decision for members to make.

2.17 Finally it should be explained that boundary extensions to Conservation Areas are very commonly carried out as previous assessments are more finely tuned and more recent heritage assets become valued where once they were not. Historic England Guidance explains that:

“... the existing boundary may have been drawn too tightly, omitting areas now considered of special interest such as... later phases of development (such as twentieth century housing), or parks, cemeteries and historic green spaces. In such cases the existing boundary may need to be extended”. (para 106)

2.19 Paragraph 3.3 of the Pegasus Note calls into question the assessment of the Debenhams Building and, in particular, how it relates to its surrounding buildings and townscape, stating that no evidence has been provided. Fairly lengthy descriptions have already been provided in the Draft Conservation Area Appraisal which states that:

“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 landmark

termination to those views, it contributes positively to the streetscene and the character and appearance of the Conservation Area”.

2.18 In their note Pegasus have stated that they do not agree with the assessment and that, “... *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 and that...in this context the former Debenhams does not share any of the characteristics of the other buildings”.*

2.19 This interpretation would be partially correct if Conservation Area Appraisals were only concerned with the footprint of an area and, indeed, as one looks at the base map it appears as if this part of the Conservation Area is simply an ‘add-on’. However, townscapes are, of course, not experienced simply by looking at a plan but are very much three-dimensional, spatial places where links, views and visual connections are very important. As evidenced by photographs in the Draft Appraisal, the Debenhams building is very much part of the streetscene of Character Area 3, visible right from the opposite end of the Conservation Area at the far west end of Clarence Street and even from outside the Conservation Area in this direction. This can be seen in Plates 1, 2 and 3 below. A site visit easily shows the strong enclosing, terminating effect that the large Debenhams Building has on the Conservation Area and how very much part of the townscape it is. The opposite of being “*entirely out on a limb*” it is a building block in this part of the Conservation Area.

2.20 When seen in its setting, as a key part in the townscape, which a site visit reveals and which is shown in the photos below, it can be seen how well the building shares the architectural language of the area. This mid-century building has classically derived proportions, wall to window ratios, string courses and a heavy cornice at first and third floor level. All of which architectural features pick up on the older classical buildings of the Town Hall, Cygnet House, Blue Anchor and the early nineteenth century classical terraces of Clarence Road, all of which have the same or similar characteristics.

2.21 It also slots into the townscape here by reason of its height and scale. A large four storey building it ties in well with the three and four storey buildings in this Character Area which include Cygnet House, Number 1 Clarence Street immediately opposite the Debenhams Building, the four storey Town Hall, four storey Mallard Court (a modern building with a classically derived design) and four storey Blue Anchor. These are the reasons why it is considered to be worthy of inclusion in the Conservation Area.



Plate 1 showing the enclosing and terminating effect of the Debenhams Building on Market Square, visible from Clarence Street.



Plate 2 the Debenhams Building from approximately three-quarters of the way down Clarence Street: a landmark, focal point for the street. It can be seen how integral and visible it is in its townscape setting.

2.22 With regard to the buildings to the north-east of the Debenhams building, number 47 to 57, these have been included to form a small townscape buffer between Character Area 3 and the rest of the High Street which is not considered to be of sufficient quality to be included in the Conservation Area. The buildings are attractive and, in our view, contribute to the special character and appearance of the Conservation Area in that they are attractive, appropriately scaled buildings with attractive upper floors, especially the upper floor of 53-55 and are indicative of the range of architectural styles and types of building to be found in this town centre Conservation Area.

2.23 However, though it is our view that they would form an attractive addition to the Conservation Area, these buildings are, of course, not considered to be of the

same status as the Debenhams Building. It should be noted that this is simply a Draft Conservation Area Appraisal and it will be for members to make the final decision.



Plate 3 The Debenhams Building as seen from the far west end of Clarence Street, enclosing and terminating this view, at one with its townscape.

3.0 Conclusion

3.1 The Draft Conservation Appraisal with its proposed extension, to include Memorial Gardens and the Debenhams building, has been carried out according to Historic England Guidance, as set out above. The small area proposed for the extension would protect the area itself and would also preserve and enhance the special character and appearance of the existing Conservation Area and it is recommended that the Draft Appraisal is agreed by members.