



Heritage Statement

Land at the rear of
19-23 Friars Stile
Road, Richmond
TW10 6NH

August 2023 | Project Ref 8282A





Project Number: 8282A
File Origin: https://heritagecollectiveuk.sharepoint.com/sites/8001-8500/Shared Documents/8201-8300/08282 - 19-23 Friars Stile Rd, Richmond/HER/Reports/2023.08.14_Heritage Statement.v1.docx
Author: Lucy Jarvis BA(Hons) MSc. IHBC FRSA

Contents

1. Introduction.....	1
2. Relevant Planning Policy Framework	4
3. Background and Development.....	7
4. Statement of Significance	17
5. Heritage Impact Assessment	21
6. Conclusions.....	25

Appendices

App. 1 Scale of Harm table (HCUK, 2019)

App. 2 Conservation Area Checklist

1. Introduction

- 1.1** This Heritage Statement has been prepared by HCUK Group on behalf of The Malins Group. It concerns land to the rear of 19 - 23 Friars Stile Road, Richmond.
- 1.2** The proposed development site is located within the St Matthias Conservation Area, a designated heritage asset in terms of the National Planning Policy Framework (NPPF) and is comprised of hard standing for parking along with a row of single storey garages. There are no listed buildings on or immediately adjacent to the Site. The closest listed building to the Site is the Church of St Matthias, listed grade II, 140m to the northeast.
- 1.3** Nos. 19-23 Friars Stile Road is recognised as a Building of Townscape Merit (BTM) by Richmond (a non-designated heritage asset in terms of the NPPF) and is an early 1950s building (with associated garages to the rear) by Eric Lyons and Geoffrey Paulson Townsend. The quality of this building has been partially compromised through ad-hoc alterations and repairs. It was historically, as it is today, in the same ownership as the proposed development site to the rear.



Fig. 1: Site location plan.

Purpose of this Statement

- 1.4** The proposals are subject to planning permission and this Heritage Statement has been prepared to support that application.
- 1.5** This Heritage Statement identifies the relevant heritage assets, describes their significance, and estimates the level of harm, if any, arising from the proposed change on the Site – in this case, the replacement of existing single storey garages, with a contemporary 3-bed residential dwelling. While it deals with heritage-specific matters relating to demolition (of the garages) and character and appearance, the overall balancing exercise is a matter for comment by Atlas Planning. This document should be read alongside the drawings and Design & Access Statement (DAS) along with the Planning Statement.
- 1.6** With reference specifically to the grade II listed St Matthias Church, there is no intervisibility between the proposed development site and the church and the Site is not apparent in any key or principal views of this listed building. No potential for harm to the church’s significance has been identified. Although consideration has been given to the church during the preparation of this Heritage Statement, further assessment has not been identified as necessary for the reasons set out above.

About The Malins Group

- 1.7** The Malins Group, the owners of the proposed development site, are a second-generation family business whose commercial activities include both residential and commercial property investment and development.
- 1.8** The investment division owns and manages a selection of multi-let commercial and residential assets. The development division specialises in the restoration of historic or interesting buildings and the regeneration of redundant or failing tertiary commercial areas.
- 1.9** Examples include:
- The Apple Apartments, a listed building, with a blue plaque, sympathetically restored to enhance the original history of the building.

- The Book House, locally listed building, with blue plaque, that was the home of The Booker Prize and a notable building during the Second World War. Beautifully refurbished retaining all original features.
- The Metal Works in Clapham, built on the site of the former Art Metal Works of William Bainbridge Reynolds, was brought back to its former glory through painstakingly returning all removed period features back to the site. This site now also has a worthy blue plaque.
- North Street Arcade and The Carisbrooke Centre are both examples of tertiary shopping areas that were successfully regenerated by the Malins Group, to provide a thriving mixed-use environment despite today's rather bleak outlook for our high streets.

1.10 As a company they are passionate about community and our built heritage, and this is apparent through the design evolution and approach to this application.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, in this case the St Matthias Conservation Area.
- 2.2** There are no listed buildings on or immediately adjacent to the proposed development site and Sections 16 and 66 of the Act (concerning the desirability of preserving a listed building or its setting) is not relevant to this initial assessment.
- 2.3** For the purposes of this Statement, preservation equates to an absence of harm.¹ Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.²
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The NPPF requires the impact on the significance of a designated heritage asset³ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁴ The Scale of Harm is tabulated at Appendix 1.

¹ South Lakeland v SSE [1992] 2 AC 141.

² Conservation Principles, 2008, paragraph 84.

³ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁴ Bedford Borough Council v SCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

2.6 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁵ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.7 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.8 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

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.

2.9 Paragraph 203 of the NPPF is relevant to 19 - 23 Friars Stile Road, which is located immediately to the south-east of, looking directly over, the proposed development site. It has elevations onto both Friars Stile Road (the primary elevation) and Onslow Road (the secondary elevation) and the rear elevation looks north-west and is of lesser detail and subservient. Nos. 19 - 23 was designated as a Building of Townscape Merit (BTM) by Richmond in 2013 and is by Eric Lyons and Geoffrey Paulson Townsend, completed in 1952. It has been altered and extended over time and its quality compromised by ground floor shopfront alterations, replacement windows and the addition of a rear stair core accessible via Onslow Road.

⁵ The balancing exercise was the subject of discussion in *City and Country Bramshill v CC SLG and others* [2021] EWCA, Civ 320.

2.10 Relevant local heritage-specific policy can be found in Richmond’s Local Plan (2018). These include,

- Policy LP1 – Local Character and Design Quality
- Policy LP2 – Building Heights
- Policy LP3 – Designated Heritage Assets
- Policy LP4 – Non-designated Heritage Assets

2.11 A full review of all relevant local policy is included within the planning statement accompanying this submission.

3. Background and Development

Cartographic Evidence

3.1 The map regression below provides and insight into the development of the Site and its immediate surroundings. In the Ordnance Survey (OS) map of 1861 the area's most prominent building is St Matthias Church, which is the focal point of the St Matthias Conservation Area today.

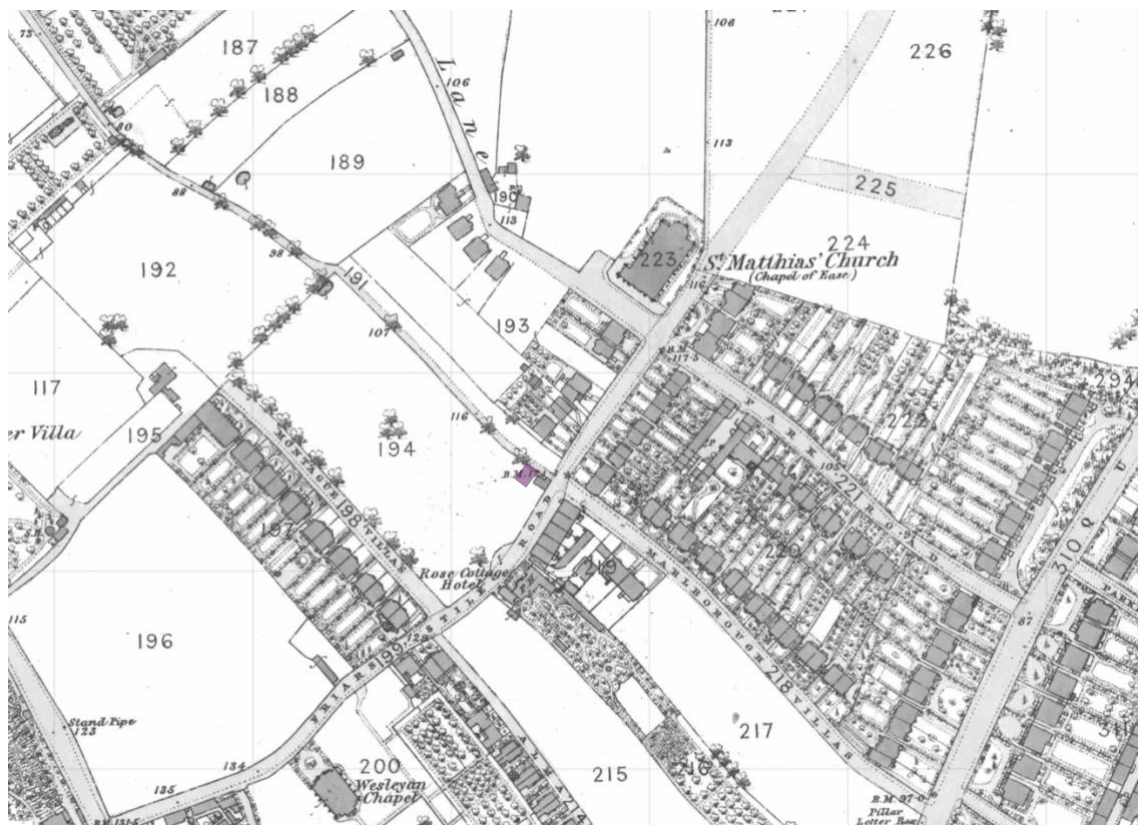


Fig. 2: Ordnance Survey map (extract), 1861

3.2 There was a single building at the corner of Friars Stile Road with Onslow Road in the mid-19th century but the land to the north-west and beyond was broadly undeveloped and remained open farmland.

3.3 By the 1890s the area is developed with rows of substantial semi-detached and detached villas – a direct response to the new rail links. Along Friars Stile Road a

terrace was also introduced with gardens to the rear. The proposed development site is visible at this time occupying the rear garden areas of the end three terraced properties and backing onto the south-eastern boundary of the Onslow Road villas, which extend north-west.



Fig. 3: Ordnance Survey map (extract), 1896

3.4

There was little change within the latter half of the late 19th century and into the early 20th century. However, in the mid-20th century, four of the terraced dwellings on corner of Friars Stile Road with Onslow Road (likely the result of WWII bomb damage) were replaced, in 1952, with the Lyons and Townsend development, still extant today.



Fig. 4: Ordnance Survey map (extract), 1913

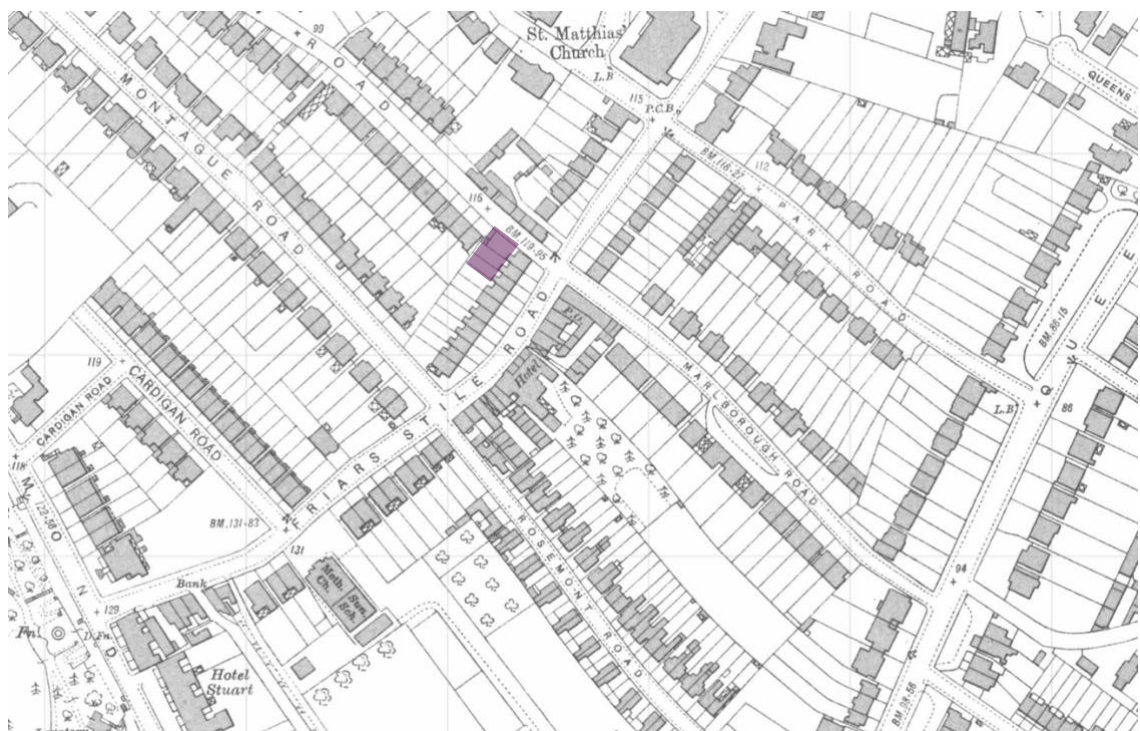


Fig. 5 Ordnance Survey map (extract), 1933

3.5

The OS mapping from 1960 (Fig. 6) is the first to show the proposed development site and Nos. 19 – 23 Friars Stile Road in the form that is currently recognisable. It is worth noting that the 1986 OS mapping (Fig. 7) matches the earlier 1960s mapping insofar as there is a small rear extension, presumably the stair core, present along the Onslow Road frontage. The garages are also present along the north-western boundary of the site in the 1960s mapping.



Fig. 5: Ordnance survey map (extract), 1960



Fig. 6: Ordnance Survey map (extract), 1986

19 - 23 Friars Stiles Road

- 3.6** It is relevant here to briefly discuss 19-23 Friars Stile Road (a heritage asset), which abuts the proposed development site on the south-eastern side and has a direct relationship to it.
- 3.7** Completed in 1952, 19 - 23 Friars Stile Road is a building designed by the combined efforts of Eric Alfred Lyons, architect (b.1912 - d.1980), and Geoffrey Paulson Townsend, architect/developer (b.1911 – d.2002). They met at Regent Street Polytechnic where they both studied, attending evening classes and worked on projects together regularly.
- 3.8** Eventually, Lyons, Townsend and others came together to create Span Developments Limited, in 1948. Span went on to build over 73 housing estates (some now in conservation areas). Span built modern architecture that drew on more traditional values to do with creating close communities, integrating inside and outside through thoughtful, quality, urban landscaping and through building small and low.
- 3.9** 19 - 23 Friars Stile Road was completed four years into the existence of Span Developments and retains some evidence of Lyons passion and ethos, which went on to be the very tangible thread running through all Span housing schemes. The building also reflects an approach that Lyons and Townsend took early on in their work together, which deliberately sought out war-damaged sites and restoration projects.

Existing Conditions

- 3.10** The neglected garages, hardstanding, unattractive and cluttered rear elevation and stair core to 19 - 23 Friars Stile Road are seen together in views from both Onslow Road and the junction with Friars Stile Road. In contrast to the quality of the immediate surroundings, this neglected composition is a considerable detractor to the conservation area, particularly given the relative prominence of its position (see Fig. 7).



Fig. 6: View of the Site from Onslow Road looking west.

- 3.11** Given 19 - 23 Friars Stile Road, along with the associated garages to the rear (which include asbestos), was designed by Lyons and Townsend, the current arrangement, including poor quality repairs and alterations, combine visually to create a character and aesthetic that could not be further from the design philosophy that Lyons (and Townsend, albeit to a lesser extent) was so passionate about – small, welcoming and community-spirited spaces, integrating architecture and urban landscaping to create a complete composition.
- 3.12** The stair core to the rear of 19 – 23 Friars Stile Road is visually at odds with the host building. It is present on mapping from 1960 and appears to have formed part of the original development. However, either the changes that have been implemented to the host building (replacement windows being a primary one) and/or alterations to the stair core itself, have created a real disconnect between the aesthetic of the main building and the aesthetic of the stair core.



Fig. 7: View looking south from Onslow Road into the Site, towards the rear of 19-23 Friars Stile Road (a BTM), designated by Eric Lyons and Geoff Townsend.



Fig. 8: View north from the first floor rear balcony of the Eric Lyons building, over the northern corner of the Site onto Onslow Road.



Fig. 9: View from the first floor rear balcony of the Eric Lyons building looking north-west across the Site.



Fig. 10: Looking into the Site from Onslow Road. The visual and aesthetic disconnect between 19 – 23 Friars Stile Road, the rear stair core, hard standing and garages is very apparent in this particular view.



Fig. 11: Plaque on the east facing elevation of the Eric Lyons building (also visible Fig. 10). This building is also recognised by Richmond as a Building of Townscape Merit (BTM).



Fig. 12: Eric Lyons building, 19-23 Friars Stile Road. Altered at ground floor and rear along with replacement windows throughout.



Fig. 13: View north-west along Onslow Road standing next to the Site (left, out of shot).

4. Statement of Significance

Assessment of Significance

St Matthias Conservation Area

- 4.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance where applicable.



Fig. 14: Conservation Area designation (Site identified).

- 4.2** Predominantly fields in the 18th century, the area began to develop in the mid-19th century with the arrival of the railway at Richmond. A number of substantial villas were built in the area, and the church of St Matthias (located to the north-east of the Site), was consecrated in 1856.
- 4.3** The church is at the centre of the conservation area and the focus of the designation. It is positioned on high ground surrounded by high quality residential development that comprises varied architectural styles and forms.
- 4.4** The conservation area appraisal notes that
- [t]here is a mix of mid and late Victorian building styles and forms, from terraced mews to large, detached villas and all maintain a consistently high-quality townscape. The building styles are noticeably different ranging, for example, from the three-storey grandeur of Montague Road to the interesting brick detailing and symmetry of Rosemont Road of the terraced cottages in the Alberts. The dwellings are mostly set back from the road, and many have retained their front gardens and these form an important feature throughout the conservation area.*
- 4.5** Friars Stile Road includes a mixture of both residential and business uses on a smaller scale than within the wider surroundings, which is particularly notable where the contrast can be made with the “grand vista from Richmond Hill.”
- 4.6** The appraisal identifies a number of problems and pressures that include “loss of traditional architectural features and materials due to unsympathetic alterations” and “loss of front boundary treatments and front gardens for parking.” Areas where opportunities and enhancements have been identified include “preserving, enhancing and reinstating architectural quality and unity.” The loss of original shopfronts and unsympathetic alterations is highlighted as a concern, and this is an area that improvements can clearly be made to enable a more positive contribution to the conservation area.
- 4.7** The value of the conservation area is principally derived from its overall architectural quality and the way in which the area developed with St Matthias Church on high ground at the centre. Because of the topography views and vistas along streets and between buildings are generally quite short but all contribute to the character of the designation. There is a commonality in material, form and

composition but there are examples of buildings independent of the wider group that stray from the standard material palette, which is predominantly London stock brick. This also adds interest and is an important part of the areas evolution and ongoing adaptation.

Contribution of the Site to the conservation area

4.8 At present the proposed development site is comprised of hard standing for parking and a group of single storey dilapidated garages. It does not contribute positively to the conservation area. It makes a negative contribution and brings the overall quality of the street and immediate surrounding down. It has a neglected feel and is in a very visible position on the corner behind 19 – 23 Friars Stile Road, which is a row of commercial premises with flats above. Although altered and easily overlooked, Nos. 19 - 23 is of interest, hence its designation as a BTM by Richmond. The original appearance of the building has been compromised by unsympathetic alterations that have disrupted the building’s original integrity and visual cohesion. This particular part of the conservation area deviates away from the more uniform and typical arrangement found elsewhere, both in terms of built forms and materiality. This reflects the unique history of the proposed development site, which is of interest within the conservation area and presents an opportunity for improvement and enhancement.

19 - 23 Friars Stile Road

4.9 19 - 23 Friars Stile Road is treated as a heritage asset for the purposes of this assessment. The architects responsible for the scheme have already been discussed. The building stands today in a slightly compromised condition having been altered and repaired on an ad-hoc basis and this has resulted in the loss of some of the building’s original character and quality. Coupled with the land to the rear, which forms the focus of this assessment (currently used for parking and including the single storey garages to be removed) the composition of the whole corner plot is an unfavourable one in the context of the conservation area but it is not without potential, particularly because there is an opportunity to revive the connection with Span Developments.

4.10 19 – 23 Friars Stile Road is recognised as being of townscape merit and this is derived from its form as well as its association with Lyons, Townsend and Span

Developments. There is a plaque on the side of the building (fronting Onslow Road) denoting Lyons' and Townsend's involvement, dated 1952.

4.11 In reality, the building today does not represent the finest of examples and much of the design philosophy and approach that went on to typify Span Developments has now been diminished by ad-hoc interventions. Nonetheless, the building remains of interest for the reasons already discussed, both architecturally (through plan and concept) and historically (through association). The redevelopment of land to the rear presents an important opportunity to revive the wider Site, reconnecting 19 – 23 into its surroundings and drawing out some of key design intentions promoted by Span Developments. This in turn has the potential to elevate the value of 19 – 23 at a local level through an improvement within its immediate setting.

5. Heritage Impact Assessment

- 5.1** This chapter of the report assesses the potential impact of the scheme on the significance of the heritage assets, in this case the St Matthias Conservation Area and 19-23 Friars Stile Road, a BTM.
- 5.2** Discussion on the rationale behind the design approach has been set out within the design document (DAS) and has not been repeated here. However, early discussion on Site, amongst the team, has contributed to the way in which this scheme has evolved. One of the key observations was the relationship to the 19 - 23 Friars Stile Road, which, although a Building of Townscape Merit (BTM), has seen better days. Drawing on elements of Lyons ethos and approach was considered important and an opportunity to revive the presence of Lyons' building within the streetscape and wider conservation area.
- 5.3** The heritage specific intentions of this scheme are, therefore, twofold: 1. To facilitate the enhancement of the Site itself through the replacement of the garages; and, 2. To revive the association of 19 - 23 Friars Stile Road to Lyons and Townsend and elevate its contribution to the conservation area. This will be done through an holistic approach to the Site and its immediate surroundings and through the implementation of improvements to the BTM and via the integration of quality urban landscaping.
- 5.4** Small buildings, community, space within and without and an "urban" response to landscaping were some of Lyons' principals to work by. The relationship of the proposed development site with Nos. 19 – 23 Friars Stile Road is an opportunity to reinstate a sense of place on this corner and amplify the influence of Lyons.
- 5.5** The proposals seek to introduce a modern single dwelling on the Site in place of the existing garages. In addition, the now poor-quality stair core fronting the road will be rebuilt. This element will be reconstructed to draw the new dwelling and original Lyons' development together in terms of form and materiality, reinstating the important visual cohesion that has been lost.

- 5.6** The Site presents an exciting opportunity for informed change and the introduction of a unique and quality scheme. It also facilitates the improvement of an altered Span building, through the upgrading of the existing stair core.
- 5.7** The Site is constrained in size, and this is why taking influence from 19 - 23 Friars Stile Road is particularly relevant. Lyons believed in small buildings, integrated internal and external spaces and urban landscaping to create a coherent arrangement.
- 5.8** The proposed new building is modest in scale and the proposals particularly take influence from Lyons through the approach to space and urban landscaping. This is a far better solution than introducing a new dwelling onto the Site that does not connect with its neighbours visually or in concept. The approach taken is one of re-connection and subtle association. Similarly, introducing a building onto the Site that is overtly traditional in appearance, and draws heavily on its neighbours to the west, or takes the form of a more traditional mews buildings, has the potential to result in a much more visually bulky and prominent building that blurs the lines in terms of what it is trying to be and how it is trying to fit in. That approach would not be entirely honest and could be misleading in terms of how the proposed development site has evolved and how it will be appreciated and understood in the future.
- 5.9** The proposals also, importantly, relate to the conservation area whilst responding to the quirks and constraints of the Site. This has been best enabled through a more contemporary approach that allows better scope to manipulate form and massing.
- 5.10** The new building's form responds to the constraints of the Site stepping in and away from the houses immediately to the west and communicating, to a greater extent, to the Span building on the opposite side of the courtyard area. The tonality of the building takes reference from both development to the north and south of it. Red brick is dominant material, tying in with 19 - 23 Friars Stile Road, with which it has the closest relationship historically. The timber cladding offers up a contemporary, lightweight and subservient finish that pulls out the colour of the London stock bricks prevalent within Onslow Road to the north-west of the Site and within the wider conservation area. The approach to this scheme is holistic and

comprehensive pulling all elements of the Site and the development to the east together visually.

5.11 Parking is screen behind a low boundary wall with soft planting to soften views from the road. This planting is also carried over to the opposite side of the Site (left side of image at Fig.15 below) to from the entrance.

5.12 A quote taken from a promotional booklet, prepared by The Eric Lyons Cunningham Partnership (ELCP)⁶ has been considered particularly useful in informing the way to deal with the Site and the relationship between architecture and landscaping. An extract has been copied below:

...The introduction of Nature into the man-orientated urban environments can be decorative and soften the impact of hard building masses. [...] The two design principles join to provide a unique approach to the problems of creating places with individual identified. The spaces in between the buildings are not left to chance, and this integrated design process leads to a cohesive outcome where buildings help to create the setting and the settings enhance the buildings.



Fig. 15: Visualisation looking south-west directly into the Site.

⁶ Barbara Simms ed. *Eric Lyons & Span*, RIBA Publishing (2006)



Fig. 16: View looking west over the new dwelling and its relationship to Onslow Road.

5.13 The use of landscaping by Lyons and Townsend wasn't necessarily extensive or dramatic and often simply comprised the addition of single plants, adding definition or sensitively screening elements of built form to mitigate the perception of massing and bulk and visually connect built form to the spaces between. This has been the approach adopted on the proposed development Site.

6. Conclusions

- 6.1** The work undertaken in the preparation of this Heritage Statement confirms that the proposals are informed and wholly appropriate, drawing heavily on the history and character of the Site and its immediate surroundings to introduce a quality and exciting scheme.
- 6.2** The overall approach is an exciting one that introduces a quality building, and enhances an existing arrangement, to bring about a positive change within the conservation area and elevate the visual contribution of this Site in views from the road.
- 6.3** No harm to the character and appearance of the conservation area has been identified. It is anticipated that there will be an enhancement for the purposes of the council's duty under Section 72 of the Act and paragraph 202 of the NPPF will not be engaged. This scheme should be looked on positively, as an informed and intelligent response to a constrained and transitional site in need of improvement.
- 6.4** This design response improves, as well as secures, the long-term use of a small, neglected, backland plot, restoring quality to an existing Building of Townscape Merit, and helping to better reveal, and make reference to, the connection to the well-known architects Eric Lyons, Geoffrey Paulson Townsend and Span Developments, providing a stimulating environment to inhabit.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁷

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁷ See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

Conservation Area Checklist

Guidance issued by Historic England on the identification of important buildings in conservation areas has been available in various forms for many years. It was originally expressed in terms of ten questions and is currently contained in a checklist of twelve questions in Table 1 of Conservation Area Designation, Appraisal and Management, Second Edition, 2019 (Historic England Advice Note 1).

It is generally accepted that the questions are not criteria to be met or otherwise, and that a balanced overall assessment is required with reference to the “checklist”. Historic England’s position, set out in the “Positive Contributors” box after paragraph 49 of the guidance, is that “A positive response to one or more of the following 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”. It should be noted that although 19 – 23 Friars Stile Road is recognised as a Building of Townscape Merit, its quality has been compromised through interventions over time. The stair core and garages no longer relate harmoniously with the main building and original design ethos of the Span development has been heavily diluted, eroding much of the original character.

The twelve questions in the checklist have been answered in the table on the next page. Although a “yes” has inevitably been recorded against some standard answers (a “no” would be difficult to record to some of the questions in any circumstances) a balanced interpretation of the result would be that there is no reason to suppose that the garages on the proposed development site cannot be removed and replaced by a dwelling far more capable of elevating the quality and contribution of the site to the conservation area.

See the table on the following page.

Appendix 3 contd. – Table (see text on the preceding page)

Question	Answer
<i>Is it the work of a particular architect or designer of regional or local note?</i>	Yes, (Lyons and Townsend – Span Development). However, the garages are a subservient elements of the original scheme and not integral to an appreciation or understanding of that association today.
<i>Does it have landmark quality?</i>	No.
<i>Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?</i>	No.
<i>Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?</i>	No.
<i>Does it contribute positively to the setting of adjacent designated heritage assets?</i>	No.
<i>Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?</i>	No.
<i>Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?</i>	No.
<i>Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?</i>	To a degree, yes, but the garages are not a quality feature and form part of a wider site that has had much of its original design intention compromised.
<i>Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park or a landscape feature?</i>	No.
<i>Does it have historic associations with local people or past events?</i>	No.
<i>Does it reflect the traditional functional character or former uses in the area?</i>	No.
<i>Does its use contribute to the character or appearance of the area?</i>	No. The use of the garages is now largely redundant, leaving the Site underused. The garages do not contribute positively to

	the character and appearance of the conservation area and include asbestos, making them unsafe.
--	---

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)