APPENDIX F

SUMMARY ANALYSIS OF RATIONALE FOR NEW CONSERVATION AREAS / AMENDMENTS TO EXISTING CONSERVATION AREA BOUNDARIES

Proposed New Conservation Area: Queens Square and The Broadway

- 1.1. The proposed new Conservation Area boundary (Appendix A) includes the surviving extent of the central shopping district laid out for Crawley New Town in the 1950s, including Queens Square, The Broad Walk, The Pavement, and much of The Broadway, Queensway and the southern side of the Boulevard. The consultants assessed this area for potential Area of Special Local Character (ASLC) status but concluded that Conservation Area designation would be more appropriate due to the area's prominence. A larger area, including the Martletts, Parkside Car Park and the full length of Queensway was also initially considered for ASLC status, but was felt to lack architectural / design coherence.
- 1.2. 19 consultation responses were received regarding this proposed Conservation Area (as set out more fully in Appendix E, together with responses from the consultants Place Services and CBC). Views expressed were mixed. 6 respondents tended to support the designation and recognised the importance of the area to the identity of Crawley as a New Town. 8 objected to or were critical of the proposal, with the remainder being more neutral or commenting on separate matters. The main grounds of objection were as follows:
 - The area is not of sufficient historic or architectural interest to merit Conservation Area designation
 - To the extent that the area ever was of historic or architectural interest, this
 has by now been too much eroded by more recent changes to justify
 Conservation Area designation
 - Conservation Area designation would impede the full realisation of the area's potential to meet economic, housing, and other needs and support the modernisation of the town
 - Conservation Area designation would restrict development potential and have a negative impact on property values

In addition, some of the more neutral comments referred to issues of maintenance and queried whether Conservation Area designation would make any positive difference to the appearance of the area.

- 1.3. CBC officers and the consultants have given further consideration to these representations and further discussion has taken place with Crawley Town Centre Business Improvement District. On balance it is considered that Conservation Area designation based on the proposed boundaries would be justified and beneficial, with potential to achieve positive economic, cultural, and social impacts in addition to the core function of preserving and enhancing the historic and architectural interest of the area.
- 1.4. Firstly, the proposal is justified in terms of **heritage significance**, when assessed against nationally recognised criteria. The area was developed on a comprehensive basis during the 1950s by Crawley Development Corporation and was marked by a high degree of cohesion in terms of layout, architectural style, and detailing. This remains apparent to this day, notwithstanding the change which has occurred in the intervening period. As such the area represents a significant example of post-war New Town architecture and planning, exhibiting qualities which are increasingly coming to be appreciated for their historic interest. Queensway, Queens Square and

The Broad Walk feature in *Modern Buildings in Britain: A Gazetteer* (2022) by the historian Owen Hatherley, who states that 'as an exemplar of fitting a New Town into an older one, this is excellent work.'

- 1.5. Conservation Area designation would help to **enable change while respecting the special character** of the area, including its contribution to Crawley's identity as a New Town. The intention would not be to block change but rather to ensure that changes take account of the key characteristics which define the character of the area, and achieve high quality design, as has been achieved in the existing High Street Conservation Area.
- 1.6. The heritage significance of the area, properly maintained and enhanced, would represent an asset which can support economic regeneration objectives. Heritage assets often contribute to the appeal of strong town and city centres, and the recognition of heritage frequently forms a key element of successful urban regeneration initiatives.² There are several aspects to this:
 - Heritage assets help to create an intangible 'sense of place', which needs to be experienced in person and therefore attracts people to an area.
 - Heritage assets bring to the fore the unique identity of a particular place, helping to reinforce its profile and 'brand'.
 - Heritage assets and the story which they articulate can provide a focus for local pride and cultural participation, contributing to community wellbeing. The Government's 2022 Levelling Up White Paper includes a mission to improve 'pride in place, such as people's satisfaction with their town centre and engagement in local culture and community', recognising 'culture and heritage' as a key programme within this.
 - Heritage designation can provide a basis for stronger stewardship of an area, including through attracting grant funding, leading to a physical environment of higher quality and greater stability over time.
 - By improving the 'experiential' quality of an area heritage assets can reinforce the effects of other interventions such as cultural events.

The positive economic impacts arising from the presence of heritage designations are borne out in several analyses, including the finding that Conservation Area designation is associated with higher residential property values; faster growth in values.³

- 1.7. It is important to note that the perception of these relationships is not limited to more 'traditional' pre-twentieth-century heritage assets. There are over 250 existing twentieth-century Conservation Areas in England, including 4 in Crawley. Appreciation of leading examples of twentieth century and post-war urban planning and design has grown with time and has increasingly become a feature of town and city centre regeneration, as illustrated by the following case studies:
 - Stevenage was the first post-war New Town, and its Town Square Conservation Area was designated as a Conservation Area in 1988 and extended in 2010. The wider town centre setting of the Conservation Area is the focus of an ongoing regeneration programme with up to £1bn investment over 20 years, including additional homes, business space, leisure facilities, retail, infrastructure, public realm, and landscaping. The town's modernist

¹ Owen Hatherley, *Modern Buildings in Britain: a Gazetteer* (Particular Books, 2022).

² 'Historical Opportunities: How Heritage-led regeneration can drive town centre change', Lichfields, 2021; 'Heritage and the Economy', Historic England, 2020.

³ 'Heritage and the Economy', p.39; 'The role of culture, sport and heritage in place shaping', TBR, 2016, pp. 2-3, 28-33; 'An assessment of the effects of conservation areas on value', LSE, 2012.

- heritage and heritage assets have been an important influence in shaping the proposals.
- Weston-Super-Mare's 'Great Weston' Conservation Area was designated in 2018, combining several existing Conservation Areas and extending them to include additional areas of the town centre. These include a twentieth-century town centre district which was awarded High Street Heritage Action Zone status in 2020, with a grant of up to £1.1 million in funding from Historic England for physical regeneration and a cultural programme to engage people with the heritage of the area.
- Plymouth City Centre Conservation Area, focused on the modern city centre which arose following bomb damage during the second world war, was designated in 2019, in recognition of 'an outstanding example of post-war planning and modern architecture'. This was followed by the award of High Street Heritage Action Zone status in 2020 with a grant of up to £1.9 million towards regeneration and a programme of cultural activities to celebrate the area and its heritage significance. As of May 2022 Plymouth was registering the most successful post-Covid recovery in footfall of any UK city centre, as measured by the Centre for Cities High Streets Recovery Tracker.⁴
- 1.8. The designation of the proposed Conservation Area will help to **preserve the**integrity of the Town Centre by ensuring that the council has appropriate tools to
 manage the area going forwards. The ability of local planning authorities to manage
 development in urban areas has been increasingly affected in recent years by the
 expansion of permitted development rights, including the recent introduction of rights
 to build upwards extensions on terraced commercial buildings, and to convert vacant
 ground floor commercial premises to residential use. Like a number of retail trade
 bodies, the council has previously expressed concerns that the impact of these
 permitted development rights could result in the erosion of high streets and town
 centres as a result of poor-quality development and the sporadic and unplanned loss
 of ground floor commercial units to residential use, leading to unattractive 'dead'
 frontages, and a loss of environmental quality and commercial vitality.
- 1.9. Conservation Area designation would remove or restrict these permitted development rights. For example, the right to convert ground floor premises to residential use would become subject to consideration of 'the impact of that change of use on the character or sustainability of the conservation area'. While the potential impact of these permitted development rights does not in itself provide the primary reason for Conservation Area designation, therefore, it does reinforce the argument that designation can bring wider economic and environmental benefits to the Town Centre.

Gossops Green Neighbourhood Centre

- 1.10. The proposed Conservation Area boundary reflects that used in the 'Areas of Special Local Character Assessment' prepared by the consultants. It is focused on the core of the neighbourhood, comprising the parade, the Windmill pub and St Alban's church, together with surrounding areas of housing and open spaces on Gossops Drive, Medway Road, Lavant Close, Cobnor Close, Rother Crescent (north side), Buckswood Drive (north side) and Kidborough Road (west side).
- 1.11. There were 11 consultation representations relating to this proposed Conservation Area (as set out more fully in Appendix E, together with responses from the consultants Place Services and CBC). Views expressed were mixed. A number of

⁴ https://www.centreforcities.org/data/high-streets-recovery-tracker/ (accessed 12 May 2022)

respondents supported the designation and recognised the importance of the area as a superior example of one of Crawley's original neighbourhood centres. Others were critical of the proposal. The main grounds of criticism were as follows:

- The area is not of sufficient historic or architectural interest to merit Conservation Area designation;
- The area is poorly maintained/managed and has become run-down and unattractive.
- 1.12. CBC officers and the consultants have given further consideration to these representations. On balance it is considered that Conservation Area designation on the basis of the proposed boundaries would be justified and beneficial, with potential to preserve and enhance the historic and architectural interest of the area.
- 1.13. The proposal is considered to be justified in terms of heritage significance when assessed against nationally recognised criteria. Gossops Green represents one of the most architecturally successful of Crawley's original neighbourhood centres, as exhibited in the detailing and materials of the buildings, the relationship between buildings and open spaces, and the area's dramatic elevated setting, providing views of forested areas beyond the built up area to the south and west. The quality and interest of the neighbourhood parade and St Alban's Church are already recognised in the fact that these buildings are locally listed. We would also note that the designation of the Southgate Neighbourhood Centre Conservation Area in 2013 provides a positive precedent for the creation of a Conservation Area of this nature. This has helped maintain and enhance the character of the area, for example through ensuring a more visually suitable means of enclosure to the front garden at the Downsman pub.
- 1.14. Regarding questions of maintenance and upkeep: these are not directly relevant to the question of whether the area has sufficient heritage significance to merit Conservation Area status, although any impact on this issue arising from the proposed designation is likely to be positive. The preparation and adoption of a Conservation Area Statement for the area will introduce more detailed development guidance and management proposals, while the planning controls which come with designation should help to ensure that further changes preserve or enhance the character of the area.

High Street Conservation Area

The proposed amended boundary to the High Street Conservation Area include an extension to the north across The Boulevard to include the grade II Listed 103 High Street, known as 'The Tree', which is the home of Crawley Museum, as supported by the consultants. At the southern end of the Conservation Area, meanwhile, the consultants did not support a separate suggestion that the Conservation Area be extended southwards to the railway. They further recommended the removal of St John's House and Gainsborough House, at the junction with Haslett Avenue West, from the Conservation Area, suggesting that these are out of scale with the rest of the area and include details which are out of keeping with the appearance of the older buildings. The proposed boundary removes St John's House but retains Gainsborough House within the Conservation Area, as it is considered that notwithstanding the points raised by the consultants the building has sufficient interest to justify leaving the current boundary in place at that location. The proposed boundary also reflects the removal of part of The Broad Walk, which would become part of the proposed new Queens Square and The Broadway Conservation Area, if adopted.

- 1.16. There were 5 consultation representations relating to the proposed boundary. Comments on the proposed northward extension were supportive. In addition representors made further comments as follows:
 - Request for consideration of further northward extension to include the Grade II Listed 109 High Street, known as Boscobel, and additional areas of grass verge leading towards it;
 - Request for reconsideration of a southward extension to include the east side of the High Street south of Haslett Avenue West, notably 1-7 High Street;
 - Request that boundary changes are not implemented until the High Street Conservation Area Statement has been completed in draft form.
- 1.17. CBC officers and the consultants have given further consideration to these representations. On balance it is considered that the proposed boundary is most appropriate.
- 1.18. In respect of 109 High Street ('Boscobel'): while this is clearly a building of historic interest in its own right, the buildings between it and 103 High Street ('The Tree') are late twentieth century buildings of no particular historic or architectural significance. It is considered that the inclusion of these intervening buildings within the Conservation Area (as would be required in order to include no. 109) would weaken the special interest of the Conservation Area, while the fact that no. 103 is a Listed Building provides substantial protection in any case. The proposed boundary would include the grass verge immediately to the west of no. 109.
- 1.19. In respect of the buildings on the eastern side of the High Street further south: here likewise the buildings in question are separated from the proposed Conservation Area boundary by modern development, here in the form of Portland House, a large, four-storey office building, in a style bearing very little resemblance to the predominant character of the buildings in the Conservation Area. Introducing Portland House into the Conservation Area (as required in order to include 1-7 High Street) would significantly weaken the special interest of the Conservation Area.
- 1.20. Regarding the request to hold the changes in abeyance pending the preparation of a draft Conservation Area Statement: the importance of an updated Conservation Area Statement in helping to guide the council's approach to preserving and enhancing the character of the area is appreciated. At the same time it is considered that the council, having obtained consultant advice on the Conservation Area boundaries, should implement the recommended changes without additional delay unless there is any overriding objection to them in principle. This will help to ensure that the Conservation Area designation operates as effectively as possible, and avoids any unnecessary appearance of casting doubt on the validity of the consultants' findings in relation to the High Street or any other actual/proposed Conservation Area.

St Peter's Conservation Area

- 1.21. A small boundary change is proposed, namely the addition of the Grade II listed 60-62 Ifield Road and the associated curtilage to the Conservation Area, as recommended by the consultants. These properties are currently immediately adjacent to the Conservation Area boundary.
- 1.22. There were 5 consultation responses concerning this proposal. The proposed extension was widely supported. The only additional comment was to suggest consideration of a further extension to include no. 64 Ifield Road.

1.23. Having given further consideration to the comments, CBC officers and the consultants consider that the extension to include 60-62 Ifield Road is appropriate but that 64 Ifield Road, a much more recent property, lacks sufficient historical or architectural interest to merit inclusion.