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E: [REDACTED]
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8 February 2024

Your Reference: TR020001
Our Reference: 20040643

Dear Ms Dowling,

**Re: Planning Act 2008 (as amended)
Application by London Luton Airport Limited for an Order Granting
Development Consent for the London Luton Airport Expansion project**

This letter provides Luton Borough Council's (LBC) response to the Examining Authority's (ExA) Rule 17 letter of 31 January 2024 [PD-024].

The ExA's request for further information and written comments was in relation to conservation area character appraisals, with the ExA asking LBC to:

"Confirm whether any conservation area character appraisals exist for the conservation areas listed in paragraph 10.7.45 of ES Chapter 10 [AS-077]. If so, please submit copies of these and advise whether there are any matters contained within them that are relevant in the assessment of the application."

The conservation areas within Luton that the Applicant referred to are:

- a. High Town Road Conservation Area;
- b. Luton Town Centre Conservation Area;
- c. Luton South Conservation Area; and
- d. Plaiter's Lea Conservation Area.

LBC only has a published character appraisal for the Plaiter's Lea Conservation Area and that is attached to this letter.

LBC has no further comments in relation to the contents of the ExA's Rule 17 letter.

Yours sincerely

[REDACTED]

Sue Frost
Service Director Sustainable Development

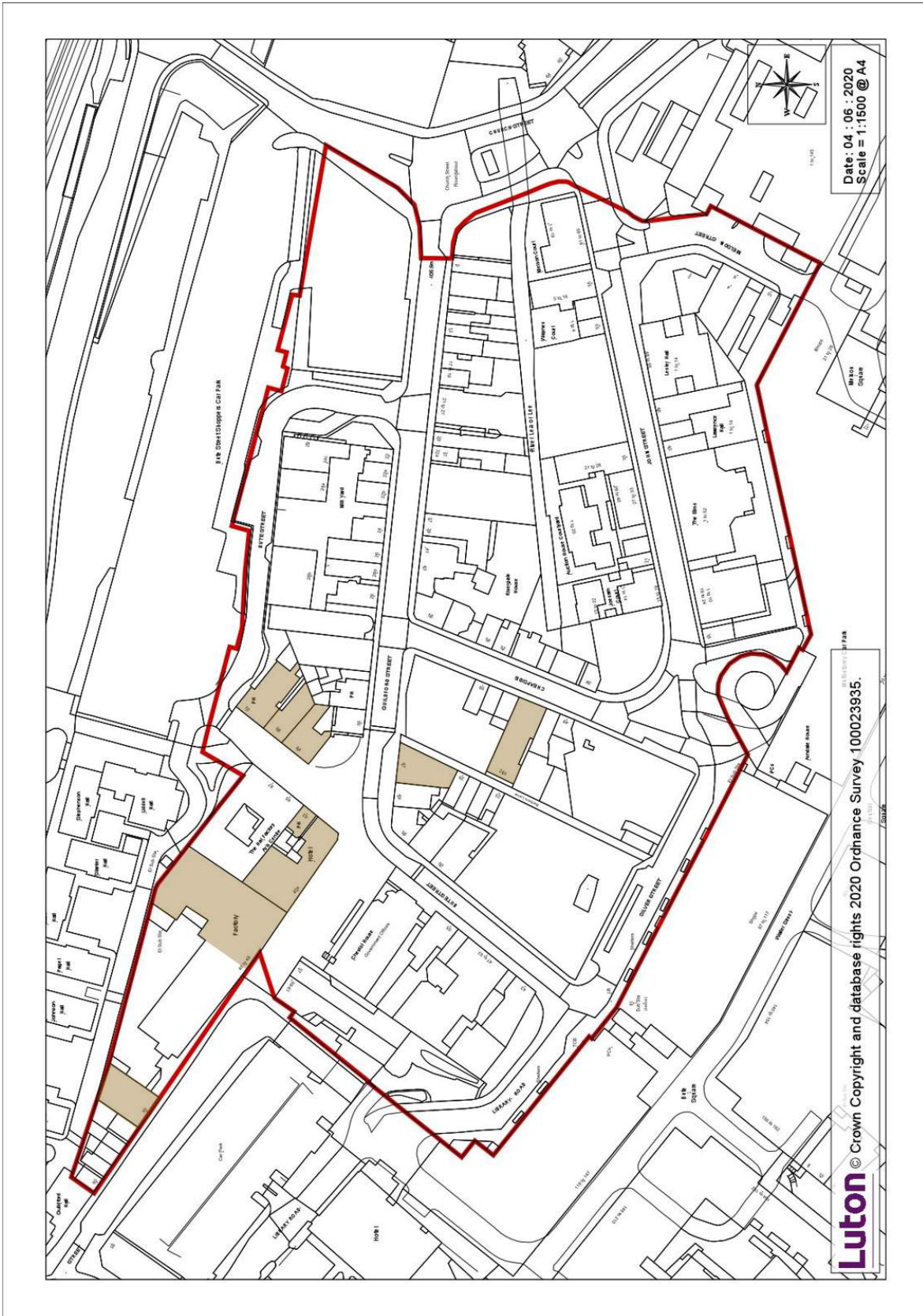
Luton

Plaiter's' Lea: The Hat District Conservation Area Appraisal July 2020



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Plan 1 Plaiter's Lea: The Hat District Conservation Area Boundary (red) and listed buildings (brown).

1. Introduction

1.1 Purpose and Content

This document is a conservation area appraisal for the Plaiter's Lea: The Hat District Conservation Area in Luton Town Centre (see Plan 1). The purpose of the document is to help define the special architectural or historic interest (significance) and character of the conservation area. The document is a material consideration in the planning process and can inform the application of statutory planning policies. Thus, the document can assist decision makers, but also those preparing development schemes involving the conservation area and its setting.

The document has been prepared to provide a practical tool to inform the development management process. So the level of detail and focus of the document is a reflection of this. For those interested in more detailed information, this can be found in the *Plaiter's Lea Conservation Area, Luton – Historic Area Assessment, English Heritage, 2011*.

Conservation area status does not prevent change. Indeed, heritage can be a catalyst for change. This document should help to manage such changes and ensure that development preserves or enhances the character or appearance of the conservation area. So it should also be used as a basis in developing economic development or regeneration strategies, enhancement projects and other initiatives for the area.

Heritage is protected for its cultural value, but it also has economic, community, environmental and other values. These other values are dealt with in the Plaiter's Lea: The Hat District Conservation Area Management Plan, which complements this document.

1.2 Boundary and Location

The Plaiter's Lea Conservation Area was designated in 1991. The boundary was amended to take in an additional area in 2020. In addition, the name was changed to the Plaiter's Lea: The Hat District Conservation Area.

The Conservation Area is located on the edge of Luton Town Centre, effectively linking the town (rear of The Mall Shopping Centre) to the Railway Station.

Luton Town Centre dates from the Anglo-Saxon period, with a medieval core around the Church of St Mary. The Town Centre is within the shallow valley of the River Lea.

The River Lea runs through the conservation area, but is mainly hidden and culverted. Reinstating the river and making it accessible would be a key enhancement to the character and appearance of the Conservation Area.

Some buildings in the area are Grade II Listed Buildings (buildings of special architectural or historic interest).

These are:

Bute Street: 61, 63 (Great Northern Public House), 64 Bute Street, 66-68 (Italian Restaurant), 70 (George II Public House).

Guildford Street: 40, 40A, 47.

Cheapside: 53 (The Cowper Arms)

1.3 Statutory Provisions

Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 defines conservation areas as follows: 'area of special architectural historical interest the character or appearance of which it is desirable to preserve or enhance'.

Section 71 deals with the 'Formulation and publication of proposals for preservation and enhancement of conservation areas'. This places a duty on local planning authorities 'from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas'. Such proposals must be the subject of consultation. This is dealt with more fully in the Plaiter's Lea Conservation Area Management Plan.

Section 72 places a special duty on local planning authorities planning decisions as follows: "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area".

Sections 16 and 66 relate to consideration of applications for listed building consent and planning permission respectively and require special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

At present there is no Article 4 Direction to restrict permitted development rights. This has led to some erosion of the Conservation Area's special interest and character. As the area regenerates, this erosion is likely to increase, unless an Article 4 Direction is put in place.

1.4 Policy

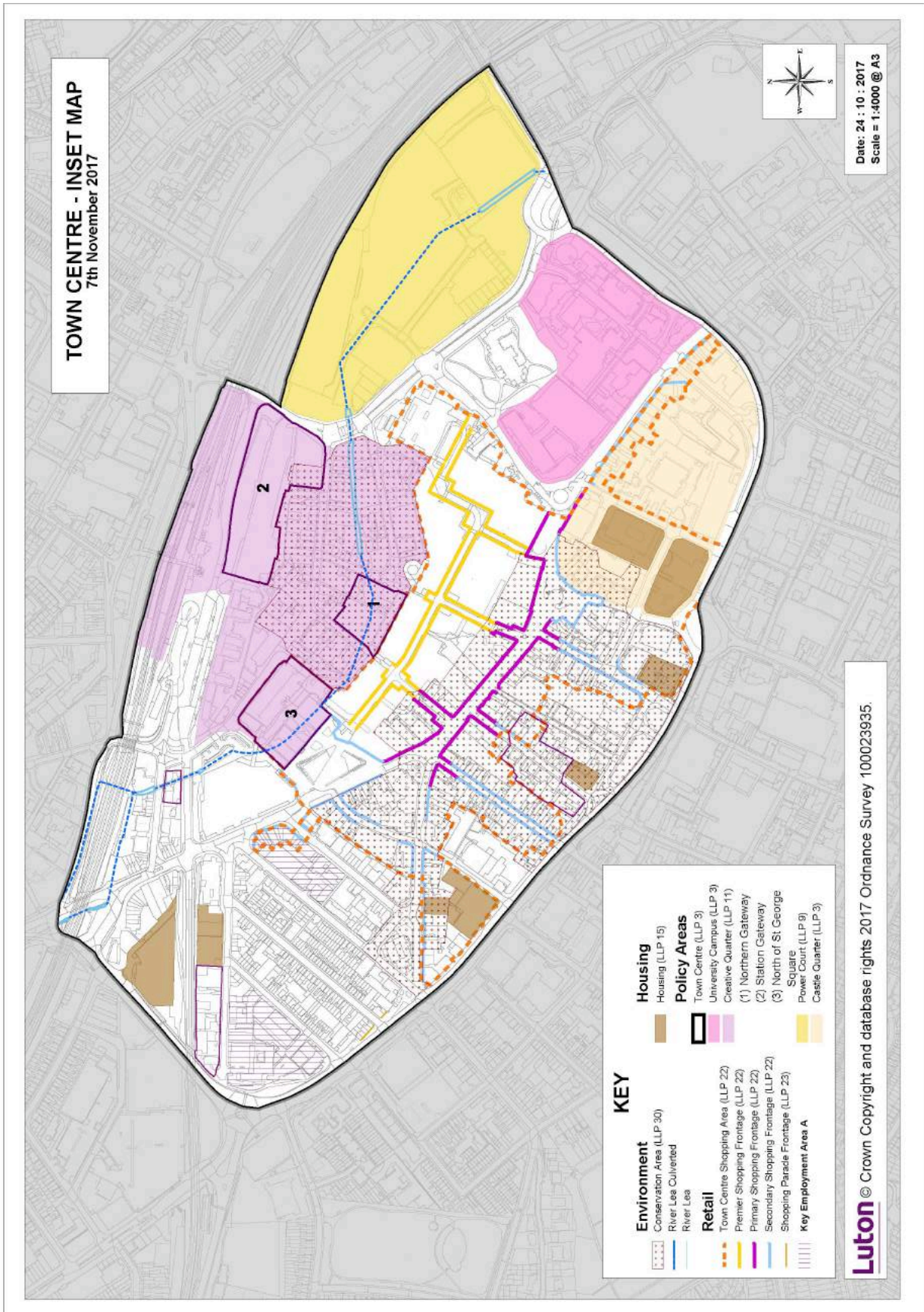
National policies on heritage are contained in the National Planning Policy Framework 2019 (NPPF), in particular in Chapter 16. This contains advice on plan making and development management. Further guidance is contained in the Government's Planning Practice Guidance (PPG).

Local Policy is contained in the Luton Local Plan 2011-2031, adopted in 2017. Numerous policies are relevant to the conservation area. LLP30 deals specifically with the Historic Environment.

Policy LLP11 Creative Quarter is a strategic allocation and includes the conservation area, with some additional land outside of the conservation area boundary to the north and west (see Plan 2). The policy aims to transform the area with a mix of uses, including residential, leisure, restaurants, retail and creative businesses.

Other policies of particular relevance are: LLP25 High Quality Design; LLP26 Advertisements and Signage; LLP27 Open Space and Natural Greenspaces. There is also guidance on shop fronts.

There is no neighbourhood plan in force.



Plan 2: Luton Local Plan Town Centre Inset Map

1.5 Community and Stakeholder Engagement

A placecheck was undertaken in November 2017. Some of the outcomes from this were:

- The former hatting industry has shaped the area and contributed to many of the standout buildings, with some successful conversions;
- Identification of architectural details, such as interesting roofscapes, clock towers, set-back drainpipes and decorative stones,
- Interesting drain covers, cellar grates and other pavement details;
- Harm from poor shopfronts and erosion through poor maintenance;
- Threat from development proposals;
- Rediscovering the River Lea could be a key theme in improvement of the area;
- A masterplan would be of benefit.

More recently, there has been engagement over the draft Management Plan, which complements this document. This involved drop in events, guided heritage tours and an online survey. Some of the key outcomes relevant to this appraisal were:

- Support for the boundary change to extend the conservation area along Guildford Street;
- Concern over loss of key features such as doors and windows and support for an Article 4 Direction;
- Empty and abandoned buildings need to come back into use.
- Focus on the River Lea, which should be opened
- More trees and planting needed
- Protect existing buildings with historical importance and create new buildings with higher architectural quality;
- There are opportunities to make more effective use of land and buildings within the Conservation Area, including redevelopment or enhancements (such as Cheviot House);
- New land uses, particularly residential, should be sensitively located so as to not undermine existing uses, in particular the Arts Centre;
- There should also be additional controls on appropriate materials for all aspects of the buildings;
- It might be interesting to have some clear demarcation of the area, for example through use of different coloured paving throughout;
- Need to communicate the value of heritage to existing and potential developers;
- A shopfronts design guide would be useful;

The feedback from community and stakeholder engagement has informed the content of both this document and the Management Plan.



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The Conservation Area is architecturally diverse, reflecting its continual development and redevelopment over time.

2. Special Interest - Overview

2.1 Special Interest and Character

This part of the character appraisal describes the **special architectural or historic interest** and **character** of the Conservation Area. It does this by setting out the historic development of the area and considering general townscape and building characteristics. More detailed analysis of each street, including individual buildings, is included in Part 3 of this document.

2.2 Historic Development

The Conservation Area designation recognises the role of the area in the straw and felt hatting industry, which was a dominant local industry in Luton in the eighteenth and nineteenth and into the twentieth centuries. Many of the buildings associated with the industry survive and are concentrated in the Plaiter's Lea: The Hat District Conservation Area.

The majority of the surviving buildings were related to the production, storage, sale and distribution of hats as well as related trades such as dyeing and bleaching, ribbon making, box making or transport. Many are now being used as business premises unrelated to hat making, whilst others have been converted for domestic use.¹

The development of the area can be discerned from study of various historical maps. Some development can be dated back to the 1840s. The period of most rapid development was between 1860 and 1880. This is probably related to the opening of Luton's first railway station in 1858. This provided transport links for raw materials, goods and also for merchants and buyers.

Many factories were established near to the railway, with Plaiter's Lea as a particular focus. By 1880, much of the form apparent today was established. The main focus for factory buildings was Bute Street and Guildford Street. The hatting industry and supporting industries continued to expand and develop into the twentieth century.

New factories were still being constructed in the inter-war years. Post Second World War, some original buildings have been demolished and redeveloped. The Mall shopping centre, adjacent to the Conservation Area, has been the most damaging in terms of setting, involving the loss of historic fabric and street patterns.

The Plaiter's Lea: The Hat District Conservation Area has seen the decline of traditional industries in the post-war years. More recently, these have been replaced by new commercial, cultural and residential uses.

The area is identified as being 'at risk' on Historic England's At-Risk Register. Whilst there has been investment for new business, cultural and recreational activities, not all investment has been positive in terms of the quality of development and alterations to historic properties. The challenge is to make the area more attractive to investors, but also to ensure that the quality of investment is appropriate to the Conservation Area.

¹ Plaiter's Lea Conservation Area, Luton – Historic Area Assessment, English Heritage, 2011.



Mary Higgins Plan of Luton 1815



OS Plan 1880



OS Plan 1924



OS Plan 1967

Historic Maps of the area show that the main structure of roads and townscape footprints was in place by 1880. Whilst there was continual redevelopment of buildings over the nineteenth and twentieth century, the layout has remained mainly constant. However, through redevelopment, the height and massing of buildings has tended to increase.

2.3 Townscape Character

The character of the Plaiter's Lea: The Hat District Conservation Area is based on strong urban townscape, resulting from a mix of industrial and commercial buildings ranging from domestic scale terraces to multi-storey factories.

As with most urban areas that have developed in an incremental and unplanned way, the Conservation Area is characterised by diversity in terms of scale, height, materials, construction, and architectural style.

The most unifying townscape characteristic results from continuous rear-of-the-pavement building frontages, creating a strong sense of enclosure and definition to streets and spaces. This is apparent in historic fabric, but also in more recent buildings from the post-war period of the 20th century to the present day.

Whilst the layout and general townscape character was established by the late 19th century, many of the actual buildings have changed, through with survivals from the 19th century. Redevelopment has generally involved linking new buildings to the flanking buildings either side, so that the continuous frontages are maintained.

The tendency was been for the height and massing of buildings to increase through the 20th century. In the main streets, there are sometimes dramatic changes in height between linked buildings. This means that exposed gables are part of the character.

Streets are generally flanked by active frontages, including shopfronts at ground floor level where shops and food and drink outlets are concerned. The quality of shopfronts varies greatly. But numerous historic shopfronts remain and their retention is essential. Where there are poor quality shopfronts, reinstatement of more sympathetic frontages would be beneficial.



The predominant townscape character is based on strong enclosure and definition of streets and spaces, created rear-of-the-pavement building frontages of differing heights and massing. These images show two different parts of Guildford Street.



2.4 Architecture and Buildings

Architecturally the area varies greatly. Earlier buildings are smaller in scale and tend to be more functional, drawing on a local industrial vernacular. Later buildings (1880s onwards) are often of frame and panel construction, based on cast iron and later concrete frames.

The tendency throughout the twentieth century has been to larger-scale buildings. Also, late nineteenth and twentieth century buildings have tendency to more formal (polite) and eclectic architectural styles, especially in their street elevations, often drawing on national and international influences. These include revivalism (such as Queen Anne, Jacobean, Classical and other influences), but also new styles of the time (such as Art-Deco decorative detailing and the influences of International Modernism). Many properties incorporate both functional/vernacular and polite architectural elements.

Although the tendency has been to increasingly elaborate frontages, it is important to emphasise that the character of the conservation area is based on a combination of formal polite architecture and the more functional and domestic scale buildings.

There are common elements to many of the factory buildings. Many have raised ground floors with showroom windows above half-storey basement windows. Multiple entrances are common, some properties having had separate entrances to the showroom and manufacturing or storage areas, whilst some have passages or vehicular entrances through the ground floor to manufacturing space at the rear. Many buildings make use of rusticated render at ground floor level or for pilasters.

A variety of materials are used. Earlier, domestic-scale properties tend to be of brick and slate tile construction. Red and Luton Grey brick are common throughout the area. In the more formal buildings, use of rusticated render and stone dressings is common. Windows are a mix of timber sashes and transoms, with larger scale metal frame windows in the later buildings. Later buildings also tend to have iron or concrete frame construction, allowing extensive areas of glazing and use of metal panels. More detail on materials is given on the individual building descriptions, later in this document. For new development, this mixed palette of materials allows considerable choice, including bricks, stone, timber, concrete, metals, render and glass (including glass blocks). More synthetic materials and finishes, such as uPVC, are alien to the area and should be avoided.

Some gable ends show the remains of previous openings. These are of some interest. If new development is proposed which would alter or cover such features, a judgment would need to be made to balance the loss with the potential to enhance the character or appearance of the area.

There have been some recent, well-executed building conversions, such as Bute Mills and the Hat Factory.



Older properties have a more domestic scale, with a simple and functional industrial vernacular, in particular those dating from the mid-late 18th century. In Guildford Street (above) the typical hat factory elements of dual entrances and raised showroom window are present, though at a domestic scale.

The George II public house in Bute Street (left) combines local vernacular elements with more formal architectural elements, with surviving historic frontage.

A typical and repeated format for hat factories is apparent in buildings of all ages. Buildings generally contained both showrooms and manufacturing space. This required two entrances (one to the showroom and one to the manufacturing area or passageway allowing access to manufacturing space at the rear). A further feature is a raised ground floor, with raised showroom windows and basement windows below. This example is 50 Guildford Street, dating from around 1900.





The format used in older factory buildings continued in the 20th century. This example at 35-37 John Street reflects the local pattern for hat factories, with its dual entrances, raised ground floor showroom and half basement storey with window below. The elevational treatment reflects the influence of Modernism, though also reflecting a functional industrial aesthetic. The large areas of glazing are made possible by the concrete frame construction.

Frame (or pier) and panel construction was increasingly used in later factory buildings and is usually apparent in the front elevational treatment. In most instances it is expressed in a rational grid format in the main elevations, but in some buildings architectural detail is applied, for example by expressing the vertical piers as pilasters.

Stirling House at 30 Guildford Street (below) has dual entrances, one leading through to the rear. The ground floor window (re-glazed) comprises three bow windows, collectively creating a cylindrical form. This is an unusual feature.





The height and massing of buildings increased through the 20th century, as demonstrated in these examples.

Bute Mills (above left) is a more functional example, though with some architectural detail applied. The water tank, raised on a corbelled brick tower, is a key landmark feature.

40 Guildford Street (above) dates from 1905, with five bays and six storeys. The frontage expresses the iron frame (pier and panel) construction. Beyond this is 42-48 Guildford Street, of similar height. Here the frame construction is expressed in the full-width horizontal strip windows, though they have been replaced with uPVC units. More than any other former factory building, this expresses the influence of Modernism. This is a key landmark. Reinstatement of more appropriate windows and remodelling of the ground floor could enhance the building.

The Hat Factory (left) is one of the later and larger-scale buildings, clearly expressing the frame and panel construction. This has recently been subject to a high-quality refurbishment.

2.4 Streets and Spaces

The main pedestrian route through the area is along Bute Street, which links the main Railway Station to the rear entrance to The Mall shopping centre.

There are few remains in terms of historic surfacing materials for streets and pavements. However, there are surviving curbs in places and also metallic or concrete and glass lightwell covers. These should be retained.

Several open areas now exist, some used as car parks. These harm the character and appearance of the Conservation Area. This harm could be addressed by creative, high-quality new-build development, to complement the townscape character of the surrounding built area, whilst representing the period of its construction.

Spaces at the junction of Guildford Street and Bute Street and the junction of Cheapside and John Street have been landscaped to provide public realm. The economic or community function of the John Street space is unclear and standards of maintenance are poor. Remodeling or development of this space could enhance the character or appearance of the conservation area.

Recent public realm improvements in Bute Street have changed the character of the conservation area and enhanced its appearance.

2.5 Archaeology

An archaeological assessment for Luton from 2003 identified that there was limited scope for archaeological remains outside of the medieval core, though there was evidence of prehistoric and Roman occupation along the River Lea Valley, so perhaps some potential.

The River Lea runs beneath the area, including under some of the properties. Although mainly out-of-view, this is clearly an important feature that influenced the development of the Conservation Area and the wider town centre. Opening up the river could be considered as part of any redevelopment or public realm scheme.

2.6 Harm

The architectural quality of very recent development is variable and sometimes very poor. This is dealt with in more detail later in this document.

Harm has also been caused by unsympathetic alterations to historic properties, including insertion of plastic doors and windows and unsympathetic shopfronts and signs. There is also deterioration in several buildings, from lack of investment and maintenance.



John Street (above, above left, middle left) has suffered considerable harm from inappropriate new development. Whilst the rear-of-the-pavement frontages show a response to the existing townscape character, the height and massing of the development is considerably greater than the surviving historic buildings, so the new buildings dominate. The example below right, in Cheapside, demonstrates similar issues.

Stylistically, all of these examples use a generic 'heritage' style, characterised by crude detailing and finishes. Inappropriate materials, such as plastic mouldings, add further harm (above right). The decision to parody the pointed arch detail from the adjacent historic factory buildings (above) demonstrates an approach of stylistic parody, rather than analysis and understanding of the area's character.





Harm to the character and special architectural or historic interest of the area has also been caused by:

- Lack of maintenance and deterioration of fabric, as in this example in Cheapside (top left);
- Loss of original doors and windows and replacement using non-traditional materials, such as uPVC (middle and bottom left);
- Poor quality shopfronts and over-dominant signage (below).





Cheviot House (above left) is of little architectural interest and has been harmed by the installation of heavy-framed uPVC windows. This presents a development opportunity in the heart of the area.

Untidy sites and bins stored in the public realm harm the area's character (below left).

The various vacant sites and temporary carparks harm the area's character, through breaks in the continuity of townscape, but also due to poor surface and boundary treatments and uncontrolled growth. Such sites provide a development opportunity, with scope to enhance the character or appearance of the Conservation Area.

3. Special Interest by Street

3.1 Streets and Buildings

This part of the character appraisal describes the **special architectural or historic interest** and **character** of each street, including individual buildings. It should be read together with the overview of special interest in Part 2.

Whilst many buildings are mentioned individually, this should not imply that other buildings are unimportant. The special architectural or historic interest and character of the area is based on a combination of formal polite architecture and the more functional and domestic-scale buildings. So the collective value of the more functional buildings is fundamental to the character and special interest of the area.

3.2 Bute Street

General Characteristics

Bute Street is one of the oldest streets in the Conservation Area, dating from the 1840s. It is a key route from the main railway station to the north and Town Centre, via The Mall Shopping Centre, to the south-west of the conservation area. Bute Street also turns a corner and runs along the northern edge of the Conservation Area.

The street is defined for much of the length by rear-of-the-pavement building frontages, though with greatly differing scale and with a large vacant site with frontages to both Bute Street and Silver Street. The scale of development varies from 2-3 storey properties to buildings with much greater height and massing, such as the Hat Factory and Bute Mills.

An undeveloped corner at the junction with Guildford Street creates a public space, including a raised section.

The straight alignment of the main route of Bute Street allows views through the conservation area, enclosed by built frontages.

Public realm improvements have changed the character of the main part of Bute Street, improving the appearance.



Bute Street dates from the 1840s, with buildings from all periods. It is a main route through the Conservation Area, linking the town centre to the main railway station.

The townscape character is based on rear-of-the-pavement frontages. The height and massing of buildings varies, with earlier buildings tending to be of a more domestic-scale, but later buildings often being of large-scale, as with the Hat Factory.

Architecturally, the character is based on diversity. It includes domestic-scale functional industrial vernacular properties, large-scale industrial structures and more formal (polite) architecture, which often reflects national or international trends, including Classicism and Modernism.

Properties

Bute Mills (1901-24). Four and a half storeys. Red brick with yellow brick detailing. The main elevations have large windows with small panes and metal glazing bars, set into recessed brick panels. Topped by a gabled tower with yellow brick pilasters and also an iron water tank set on a corbelled brick tower feature, which creates a key landmark feature in the area. The building has been subject to a high quality refurbishment to create 'Youthscape'.

24a-c Bute Street Great Northern Steam Mills (c.1870) Large-scale brick and tile, originally a mill building with adjacent office or residential accommodation. Various window types, but also subject to poor quality alterations which harm the character of the building and conservation area, including removal of window openings and insertion of plastic windows and doors. Loading bay to main street elevation, though this has been enlarged. Reversal of the unsympathetic alterations would enhance the character of the building, street and area.

The Engine, 43 Bute Street (1990 rebuild of 1865 building, but with some survival of the original building likely) Public house, three storey, red and yellow bricks with polychromatic brick detailing. Round head windows and gable and dormer windows to upper floor.

50-54 Bute Street Terrace of four properties from the late 1870s with distinctive first floor windows with wide pilasters and broken pediments. Non-original shopfronts detract from the area's character.

55 Bute Street (opened as pub in 1864, but probably older). Three storey property with sash windows. Stone detailing to central doorway and flanking windows and pilasters at ground floor, but partly obscured by insensitive fascia.

61 Bute Street (Easy Hotel 1860s) Listed Grade II. Brick with rusticated stucco at ground floor level, and yellow brick quoins at upper levels. Sash windows at upper floors with architraves and moulded brick heads. Round headed windows at ground floor.

63 Bute Street (The Great Northern, c. 1860s) Listed Grade II. Three storeys, red brick with welsh slate roof. Ground floor is a 19th century public house frontage with pilasters and glazed stall riser. Sash windows with architrave surrounds at upper floors.

64 Bute Street (Gurney & Sons hat factory, 1889). Red brick with stone dressings. Raised ground floor contains a recessed central lobby flanked by display windows and basement windows below. The façade includes ground floor Corinthian red granite pilasters with stone fascia and curved pediment over entrance. First-floor windows with moulded mullions and transoms beneath cartouches. Second-floor windows with stone architraves. Dentilled eaves and date stone of 1889. Roundel window to attic storey.

66-68 Bute Street (pre-1880). Listed Grade II. Early domestic type buildings, of brick and tile construction with sash windows (some replaced by casement type windows) and shopfronts with simple pilasters.

The George II 70 Bute Street (1870-80s). Listed Grade II. Three storeys with sash windows and historic shopfronts.

65-67 Bute Street (The Hat factory, 1930s) Brick, concrete and render with extensive glazed frontage, sometimes referred to as a daylight factory. Built on a larger scale than previous buildings in the Conservation Area.

47-53 Bute Street (1930s) Four storey. Brick, concrete, render and metal panels. Decorative detail in parapet. Extensive glazing, comprising small-paned wooden sashes with horizontal metal panels. Another daylight factory. Piers are faced in red brick.

Hydraulic Hat Press (north end of Bute Street) was salvaged from the James Egleton Factory and now forms a feature in the public realm.

3.3 Guildford Street

General Characteristics

Guildford Street runs from the east to the north-west corner of the conservation area, widening at the junction with Bute Street to create an irregular central public space.

The street is defined for much of the length by rear-of-the-pavement building frontages, though with some gaps created by vacant sites and car parks. The scale of development varies, tending to be 2-3 storey terraces in the east part of the street, but with a much larger scale and massing to buildings in the north-west part.

The straight alignment of the two parts of Guildford Street, divided by Bute Street, allows views through the area, enclosed by the building frontages.

Public realm improvements have changed the character of Guildford Street and improved the appearance.



As with Bute Street, the townscape character of Guildford Street is based on rear-of-the-pavement frontages, comprising buildings with a range of heights and massing. Earlier buildings tending to be of a more domestic scale, but later buildings are often large-scale.

Also similar to Bute Street is the diverse architectural character, ranging from domestic-scale vernacular properties to large-scale industrial and more formal (polite) architecture.

Thus the character is based on a combination of local and national/international architectural influences.

Both Guildford Street and Bute Street include a number of former factory buildings, demonstrating the typical characteristics of dual entrances, raised showroom windows and half storey basement windows.

Properties

5-15 Guildford Street (1870s) Two storey terrace, originally part of a bigger range of semi-domestic buildings. Some original shop fronts survive. No 15 has rustication at ground floor level and sash windows with stone surrounds to the upper floor.

22 and 22a Guildford Street (Early 1930s). Two and a half storeys, brick with render details, with flat roof and parapet. Symmetrical pair. Raised display windows at raised ground floor and small pane transom windows at upper level.

23-25 Guildford Street (probably c.1910-20). Four storey, brick and stone with rendered dressings and banded rustication. Harmed slightly by replacement roof with deep eaves.

30 Guildford Street (Stirling House, 1919). Built as factory with showroom. Concrete frame with extensive glazing, render and concrete pierced parapet. The frame construction provides a basis for the symmetrical, grid pattern frontage, with applied classical detailing. Metal framed windows at upper floors. Bow window flanked by Doric columns at ground floor, between recessed entrance and passageway.

31 Guildford Street has original shop front and glazed bricks in the entrance lobby.

32 Guildford Street (late 1880s) Four storeys plus attic and a half basement with raised ground-floor showroom above. Red brick with contrasting rusticated render ground floor. Pier and panel facade expressed in brick pilasters. Parapet shows Jacobean influence. Round and cambered head windows.

36 Guildford Street (probably 1860-70) is three storey with rustification at ground floor level. Half basement and raised ground floor windows is possibly the earliest use of this arrangement in the conservation area. Two doors which originally would have given access to the showroom and the workshops. Sash windows to upper floors. Gable shows outline of three windows.

37-39 Guildford Street (1912, built as warehouse and factory built for Austin and Co.). Three and a half storeys, brown brick with rusticated detail at ground floor, painted dressings, slate roof, and sash windows above ground floor level. Ionic columns to doors and windows. Dormers to upper floor, the outer ones being topped by Baroque-type pediments. Brick factory wing to the rear with metal-framed windows.

40 Guildford Street (1905). Listed Grade II. Large-scale building, constructed as hat factory using a pier and panel construction with cast iron frame. Five storeys plus attic and basement. Shaped parapet shows Jacobean influence, with pinnacles and elaborate central pediment to attic storey. Truncated pyramid turret appears to have crowning feature missing. Two storey showroom front, with cambered and round head windows, distinguishing the showroom and offices from the factory storeys above.

40a Guildford Street (Easy Hotel, 1901-05). Listed Grade II. Red brick with yellow brick quoins and dressings and rusticated render at ground floor (built to match 61 Bute Street). Vehicle entrance at ground floor level.

41-43 Guildford Street (1880s) Two-storey range of three formerly separate properties. Painted render with sash windows. 43 is a former domestic hat factory with rear workshop and stables, brick with the stables itself using bull-nosed brick

window surrounds and fixed metal glazing (the only surviving example of a stable in the conservation area).

42-48 Guildford Street (former Alexon factory, 1960s). Concrete frame building with brick and extensive horizontal bands of windows, demonstrating the influence of twentieth century Modernism. Replacement of the horizontal strip windows using uPVC units has caused harm, though the building is still of interest. There is scope to make the ground floor more open and interactive, without harming the integrity of the building.

47 Guildford Street (1860s – possible elements from 1840). Listed Grade II. Early pottery factory. Brick with white quoins and window surrounds, curved brick corner and tiled roof.

50 Guildford Street (former Balfour & Sons hat factory, c.1900) Red brick with stone detailing. Pedimented central bay with decorated roundel. Raised ground-floor showroom windows at ground floor.

55 Guildford Street (Cheviot House). Six storey, frame construction with dark brick and glazing bands and corners. The scale and massing of the building is similar to some of the twentieth century factory buildings and is appropriate to the central location. Architecturally, it is of limited interest. Also, replacement of the continuous horizontal window bands using uPVC frames windows has further detracted from its appearance. Remodeling or replacement with a similar scale building of higher quality could enhance the character or appearance of the Conservation Area considerably.

52-60 Guildford Street (1860s) Terrace of former domestic premises, with basements which were used for storage of hat materials.

57-61 Guildford Street (1930s). Daylight factory. Concrete frame with white concrete rendering. Large metal frame windows at upper levels and bow windows (re-glazed) at ground floor. Projecting cornice. Combination of Classical and Art Deco inspired detailing. Rusticated finish at ground floor.

The Wheelright Arms (probably c.1840) Three story with sash windows and distinctive stone hoods to doorway and windows at ground floor, with central stone window mullions.

3.4 Cheapside

General Characteristics

Cheapside has a mixed character. The central part of the street is flanked by rear-of-the-pavement building frontages, mainly of three storeys. However, previous demolition has created vacant sites towards the ends of the street. These need to be redeveloped to reinstate the townscape character of the street.

The west of the northern end of the street is an area of public realm. However, this is poorly maintained and its function is not clear. Redevelopment should be considered.

The straight alignment of the street allows clear views, enclosed by built frontages, and terminated at the south end by building frontages on Guildford Street.



Cheapside shares the townscape character of Bute Street and Guildford Street, based on rear-of-the-pavement building frontages. There is a more consistent character in terms of building height, with most properties being of 3 storeys. The view towards Guildford Street is framed by the flanking buildings and terminated by larger-scale factory frontages (above).

Properties

42-48 Cheapside Terrace of four shops. Brick scroll motif repeated beneath the eaves. Matching ground-floor display windows with recessed lobby and narrow double doors.

49 Cheapside (1899-1900) Three storey, Queen Anne revival, brick first-floor oriel window with lead canopy. Built directly above the river Lea. Surviving shopfront and door and letterplate in recess. Coloured glass transom lights with etched floral design.

52 Cheapside (1880s) Two storey with dormer window to attic. Oriel window at first floor. Historic shopfront.

The Cowper Arms 53 Cheapside (1882). Listed Grade II. Queen Anne Revival style with a jettied upper floor, triple gable and oriel windows.

54-56 Cheapside Three storeys with stone and polychromatic brick detail and stringcourses above the windows.

55-59 Cheapside Domestic form factory buildings, of three storeys with sawtooth brick detailing to the eaves and Maltese cross motifs to some window heads. All shop fronts are non-original and harm the character of the area. Reinstatement shopfronts could remedy this.

3.5 Barber's Lane

General Characteristics

Barber's Lane is a narrow pedestrian route, flanked by the rears of properties fronting into Cheapside and a small terrace to the west side.

Much of the length of Cheapside is flanked by high enclosures. These are a combination of rear brick boundary walls and timber hoardings. The hoardings in particular harm the character of Barber's Lane. In addition, the inactive frontages do create a rather hostile environment for pedestrians.

Future development could both enhance the character and appearance of the conservation area and help to create a safer environment.

Properties

23-29 Barber's Lane. Important, early, domestic-scale terrace built to accommodate commercial activities at ground floor, with living quarters in the above two floors.



Barber's Lane (top left and above) is a narrow passage linking between Guildford Street and Silver Street.

Part of the Lane is fronted by a domestic-scale terrace (top left), though in much altered condition.

Much of the length of Barber's Lane is flanked by blank walls and timber hoardings, creating a rather hostile environment.

John Street has some surviving factory buildings of particular significance (bottom-left and below), but has also suffered from considerable harm through insensitively designed newer development (see previous comments on harm).



3.6 John Street and Melson Street

General Characteristics

As in much of the Conservation Area, the character of John Street is based on rear-of-the-pavement frontages. The scale varies, but tends to be 3-4 storeys. Cleared sites to the north of the street detract from this character.

John Street has important surviving buildings, but has also seen considerable harm to its character through poorly designed recent development. The scale and massing of recent development tends to be greater than surviving historic buildings. Also, harm is caused by poor composition, poor detailing and finishes, and use of crude materials including plastic, for building components. There is also a very questionable tendency to imitate features from historic buildings, but in a crude way. This has implications for the authenticity of the Conservation Area.

The Mall also impacts on John Street, presenting largely blank structures on a very large scale.

As mentioned previously, there is an area of public realm at the junction with Cheapside which is poorly maintained. Improvement or redevelopment should be considered, to enhance the character or appearance of the area.

Properties

16 John Street (c.1890, rebuild of earlier 1860s property) significant in the development of the hat factories and warehouses in the area in its use of pier and panel construction. Raised ground-floor showroom with half basement below. Gable with central oculus.

55 John Street (c.1913, former Tomson & Sons corn merchants). Luton stock and red brick, concrete details, decorative tiles. Four storeys. Pier and panel construction. Pointed arches springing from the piers, encompassing windows.

35-37 John Street (1933). Three and a half storey, concrete framed building with simple facade dominated by glazing. Raised ground floor showroom with half basement below. Extensive metal-framed windows with small panes. Unusual in similar treatment of the main doorway (west) and passageway (east). Important as a more modern and undecorated example.

10 Melson Street (probably c. 1880). Probably the earliest surviving example of pier and panel construction within the Conservation Area. Three and a half storey, red brick with rusticated piers at ground floor. Raised ground floor showroom with half basement below. Harmed by uPVC replacement windows.

3.7 Silver Street and Library Road

Silver Street provides a logical boundary to the Conservation Area, but contributes nothing in terms of built form. To the south side of Silver Street, the Mall provides a harmful setting to the Conservation Area due to its massing and lack of architectural merit.

Library Road is flanked in part by the end of a row of properties fronting onto Bute Street.

For Silver Street, the emphasis is very much on enhancement through creative and high-quality development of vacant sites, incorporating rear of the pavement active building frontages.

4. Moving Forward

4.1 Management Plan

The accompanying Plaiter's Lea: The Hat District Management Plan sets out a strategy for the Conservation Area. This character appraisal should inform not just planning decisions, but also other projects and initiatives, as described in the Management Plan.

The strategy in the Management Plan includes the following:

- Securing investment to achieve the high-quality refurbishment and full productive use of all levels of all buildings in the conservation area;
- Ensuring that all buildings are well-maintained and in a good state of repair, using appropriate conservation techniques;
- Securing external enhancement and/or redevelopment for buildings that have a neutral or negative impact on the special architectural or historic interest and character of the area;
- Achieving high-quality sustainable development of vacant sites, including informal surface car-parks;
- For all new build or external works, securing very high-quality, creative design to complement, but not imitate, the existing townscape;
- Encouraging use of experienced and creative design teams and building contractors, specialising in historic buildings and areas;
- Encouraging new development with superior environment performance;
- Improving the public realm, including opportunities for greening of the area, to create attractive streets and spaces which are flexible to accommodate different economic, recreational and cultural activities;
- Reversing alterations that cause harm to the character, appearance and special interest of the area.

4.2 Development Opportunities

There is a range of development opportunities for vacant sites, surface carparks and development of part of the public realm in John Street and Cheapside.

Development of these sites provides an opportunity to enhance the character and appearance of the conservation area. At present, they harm the character and appearance of the area by creating gaps in the urban townscape and also through poor surface and boundary treatments and their generally untidy states.

It should be emphasised that this will not be achieved through stylistic imitation, which can undermine the authenticity of the area, but through complementing the essential townscape characteristics of the area and through high-quality, creative architectural design.

Redevelopment also provides opportunities to expose the River Lea.

4.3 Development Principles

To help ensure that new development preserves or enhances the character or appearance of the conservation area, the following principles may be used:

Bespoke Design: The aim is for creative, site-specific design, to complement the townscape characteristics of the area. This should not be interpreted to imply stylistic imitation or suppression of creativity. Buildings likely to be considered as heritage in the future are likely to be the most individualistic and distinctive designs, representing their time of construction.

Townscape: The development of all sites should reinforce the townscape character of the area. This includes providing building frontages directly onto the rear of the pavement. Where developing between existing buildings, new buildings should directly link to them, where possible, to create a continuous frontage. New buildings and townscape should fall within the range of heights of existing buildings in the street and in close vicinity to the site.

Architectural Diversity: New development should add to the architectural diversity of the area and reflect the time of construction. With this in mind, 'green' design that incorporates superior environmental performance is encouraged.

Architectural Elements: Whilst encouraging architectural creativity and innovation, some of the following elements could be used in the design of new buildings:

- Where frame and panel construction is used, the expression of the frame in the front elevation.
- Expression of functional elements of the uses being accommodated in the building exterior;
- Extensive use of glazing in building frontages.

Materials: The use of local materials or materials predominant in the Conservation Area is encouraged. This includes red or grey brick, slate (or composite slate) roofs or flat roofs, stone, plate glass or glass block, concrete, and timber. Where traditional materials are used, they should be from authentic sources and not comprise plastic or other imitations. In particular plastic doors or window frames should be avoided.

Detail and Finishes: The quality of detail and finishes is critical to achieving the necessary level of design quality. Plans should contain sufficient detail, including larger-scale cross-sections, to demonstrate close attention to detail and finishes. This includes constructional details, joints, recession of panels or glazing, material finishes, and other detailing.

Conversions: For schemes involving the refurbishment and reuse of existing buildings, opportunities should be taken to reinstate original features, in particular timber or metal windows and timber doors. Where altering or extending historic fabric, the loss or obliteration of original features should be avoided.

5. Information

5.1 Authorship

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5.2 Acknowledgments

In preparing this document, the following documents have been of particular value:

- ***Plaiter's Lea Conservation Area, Luton – Historic Area Assessment***, English Heritage, 2011
- ***Draft Plaiter's Lea Conservation Area Appraisal and Management Plan***, Luton Council / Troy Planning and Design, 2018