



Heritage Statement

86-87 Broad Street,
Reading

September 2021 | Project Ref 6362B

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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1. Introduction

- 1.1** This Heritage Statement has been prepared by Heritage Collective, part of HCUK Group, on behalf of Bankfoot APAM. It relates to an application for planning permission for the redevelopment of 86-87 Broad Street Reading. Reading Borough Council (RBC hereafter) are the determining authority.
- 1.2** The application site, 86 and 87 Broad Street are not statutorily or locally listed but have, as part of pre-application advice with RBC, been identified as non-designated heritage assets. The site is also located within the setting of a number of listed buildings including, among others, the grade I listed Church of St Mary. The site is not located within a conservation area but is located close to the boundary of the St Mary's Butts/Castle Street Conservation Area.
- 1.3** In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (NPPF, 2021) this statement describes the significance of the identified designated heritage assets.



Figure 1: The application site as seen from Broad Street



Figure 2: Site location plan with the conservation area (green), grade I listed church (dark purple) and other grade II listed buildings (light purple)

The Proposals and Relevant Background

- 1.4** The proposed development has been subject to and informed by extensive pre-application discussion with RBC (LPA ref: 210058/PREAPP) and in March 2021 was presented at the Reading Design Review Panel.
- 1.5** As part of these pre-application stages, proposals (which also at that time included 88 Broad Street) entailed the total demolition of built form on the site, including the non-designated heritage assets fronting Broad Street. However, the primary heritage matter to come out of the pre-application discussions was the concern raised regarding the loss of these buildings, in particular the Broad Street facade.

In response to this, current proposals seek to undertake façade retention to the Broad Street frontage of the site with the remainder of the site redeveloped to provide a series of 15 residential units. In addition, the omission of 88 Broad Street from the site provides a degree of separation between the site and nearby listed building (namely the grade II listed Congregational Church and numbers 89 and 89a Broad Street, see below).

1.6 Behind the retained façade on Broad Street is proposed to create a commercial unit at ground floor with three levels of residential accommodation above alongside roof terraces. A new south building is also proposed facing towards the grade I listed Church which is linked to the north block by a glazed corridor above ground floor.

1.7 Aside from the non-designated heritage assets on the site, as noted above, the application site is located within the setting of a number of designated heritage assets. Not all of these assets are capable of being affected by the redevelopment of the site but, based on a site visit and application of professional judgement, those capable of being affected, and considered within this statement, include:

- Congregational Church and numbers 89 and 89a Broad Street (grade II)
- St Mary's Butts/Castle Street Conservation Area
- The Church of St Mary (grade I)
- Church House (grade II)
- Building to the west of Church House (grade II)

1.8 Other listed buildings in the vicinity of the site (including for example The Allied Arms Inn, 55 & 55A St Mary's Butts and various monuments and tombs within the church yard) are not capable of being affected by the proposed development and have been scoped out of this assessment.

1.9 The proposals are based on a thorough understanding of the historic development, character and significance of the identified assets and seeks to preserve and enhance the significance and unique heritage values of the designated and non-designated heritage assets identified.

Purpose of this Statement

1.10 The purpose of this report is to assist with the determination of the applications by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised. The heritage assets affected have been observed and assessed by the author following a site visit in September 2020. Specifically, this report assesses the significance of the identified heritage assets and the effect of the application on that significance. The report sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas (this does not extend to the setting of conservation areas).
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.4** The significance of a heritage asset is defined in the 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 setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

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

³ Conservation Principles, 2008, paragraph 84.

- 2.6** Historic England has produced guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.
- 2.7** The NPPF requires the impact on the significance of the designated heritage asset 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**.
- 2.8** 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. 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.”*
- 2.9** 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.

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

2.10 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."

Local Planning Policy

2.11 The Reading Borough Local Plan was adopted in November 2019 and contains the main planning policies for Reading up to 2036. Policies from the Local Plan relevant to this report are discussed below.

2.12 **CC7 Design and the Public Realm:** This policy notes that all development must be of high design quality that maintains and enhances the character and appearance its surroundings. The layout, landscape, density and mix, scale and architectural detail and materials will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives:

- Character - a place with its own identity and sense of place • Continuity and enclosure
- Quality of the public realm and provision of green infrastructure and landscaping • Ease of movement and permeability
- Legibility - clear image and easy to understand
- Adaptability – capable of adaptation over time
- Diversity – meets a wide range of needs.

2.13 The policy goes on to note that developments will also be assessed to ensure that they respond positively to their local context and create or reinforce local character and distinctiveness (including protecting and enhancing the historic environment of the Borough) and are visually attractive.

2.14 EN1 Protection and Enhancement of the Historic Environment: This policy notes that heritage assets and their settings will be protected and where possible enhanced. It states that all proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. It notes that any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits. Specifically relating to listed buildings, the policy notes that applications will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.

2.15 EN3 Enhancement of Conservation Areas: This policy specifically relates to development within conservation areas and as such is not relevant to the proposals which are limited to the setting of a conservation area.

2.16 EN4 Locally Important Heritage Assets: This policy notes that development proposals that affect locally important heritage assets will demonstrate that development conserves architectural, archaeological or historical significance which may include the appearance, character and setting of the asset. It goes on to note that planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that the benefits of the development significantly outweigh the asset's significance. It then states that, where it is accepted by the Local Planning Authority that retention is not important:

- Recording of the heritage asset should be undertaken and submitted alongside development proposals; and
- Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant. This may include appearance, scale and architectural quality.

2.17 EN6 New Development in a Historic Context: This policy notes that in areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of

new development. When determining planning applications for new development, the following factors will be taken into consideration: • The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);

- Sensitivity to historic context;
- Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing); and
- Whether development promotes and/or improves access to previously undiscovered or neglected historic significance

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England, 2017)

2.18 This document, published by Historic England as a second edition in December 2017, replaces the earlier 2015 setting guidance. The document provides for a thorough understanding of the setting of a heritage asset and the relationship of the setting to curtilage, character and context.

2.19 The guidance document notes, in paragraph 18, that the protection of the setting of heritage assets need not prevent change. The document recognises that not all heritage assets are of equal importance and states that the contribution made by their setting to their significance will also vary. Not all settings have the same capacity to accommodate change without causing harm to the significance of the asset.

2.20 As per earlier Historic England guidance, the document advocates a stepped approach to assessing the impact of change within setting on the significance of heritage assets. This stepped approach is:

- Step 1: identify which heritage assets and their settings are affected;

- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm; and
- Step 5: make and document the decision and monitor outcomes.

2.21 Guidance under Step 2 notes that the asset's physical surroundings and how the asset is experienced (such as views, noise, tranquillity, sense of enclosure etc.) should be taken in to consideration.

2.22 Step 3 is also important in making it clear that a proposed development should not be assessed in terms of its impact on setting; instead it should be assessed in terms of the impacts on significance. That is to say, what matters is not the extent of visibility of the development or change to the setting of an asset, but the extent of change to its archaeological, architectural, artistic or historic interest. In some circumstances, this evaluation may need to extend to cumulative and complex impacts which may have as great an effect on heritage assets as large-scale development and which may not only be visual. At the very least the assessment should address the key attributes of the development in terms of its location and siting, form and appearance, additional effects and permanence.

2.23 Paragraph 39 notes that options for reducing the harm arising from development may include the relocation of elements of a development or changes to its design. It notes that good design may reduce or remove the harm.

3. Background and Development

- 3.1** Reading originated as a Saxon settlement, its name derived from the Old English *Reada ingas* ('the people of Reada'). Its position close to the confluence of the River Thames with the Kennet facilitated riverine trading links with both London and the wider Thames Valley. The settlement was first documented by the Anglo-Saxon Chronicle in AD 871, when it was occupied by a Viking army, shortly before the Battle of Reading, in which the Saxon King of Wessex, Aethelbert, was defeated. The Vikings subsequently erected a defensive earthen rampart between the two rivers east of the settlement. Documentary sources record a second Viking incursion in 1006, when the settlement was burnt to the ground.
- 3.2** The Norman taxation document known today as the Domesday Book, which documents the period 1066 - 1086, records two manors in Reading. Within the principal manor, held by the king, there were 55 villagers and 30 smallholders. In addition to the farmland and meadow there was woodland sufficient to support 100 swine, together with four mills and three fisheries⁵. The smaller manor, which belonged to Battle Abbey (St Martin), comprised nine villagers and eight smallholders. In addition to their farmland there was woodland sufficient to support five swine, two mills and 2½ fisheries together with a church⁶. The Normans are thought to have built a castle on Castle Hill, initially an earth and timber motte and bailey castle, later replaced in stone, which was probably demolished c.1152 during the civil war in the reign of King Stephen.
- 3.3** Reading Abbey, a royal monastery, endowed by Henry I in 1121-5, was one of the largest monasteries in Europe. The surviving abbey gateway and extensive ruins of the abbey church and abbey complex within its precinct wall lie close to the River Kennet on the east side of the town. In addition to its religious functions, the abbey attracted and promoted commerce not only along the Thames and Kennet rivers but also as a result of its location at the intersection of major roads linking London with Bath, and Oxford with Southampton. In addition to its religious and royal significance, the abbey developed a planned new town with new streets and burgage plots together with a market place immediately west of its precinct; the

⁵ Morris 1978: 1.41; 1.42.

⁶ Morris 1978: 15.2.

principal streets being Friar Street, Broad Street, London Street and the Market Place itself, which attracted visitors and pilgrims from all over Europe. The town prospered in the medieval period and there are numerous documents illustrating friction between the guilds and merchants on the one hand and the Abbot on the other⁷.

3.4 A House of Franciscan friars (Grey Friars) had first been established in the town in 1233, at the opposite (west) end of the street leading westwards from St Laurence's church (built in the 1120s adjacent to the abbey) towards Caversham, a street which had been known as New Street (later Friars Street) since at least 1224. The Friary site was enlarged in 1285 because the original site closer to the river was seasonally flooded⁸. The approximate site of the Greyfriars House lies in the vicinity of No. 65 Friars Street.

3.5 Following the dissolution of the monasteries by King Henry VIII in 1538, the abbey was given to the Duke of Somerset as a private house, but having been left vacant was quickly robbed of building stone by the townspeople. Nevertheless some of the buildings, such as the abbot's lodgings were retained for use as occasional royal accommodation. The King gave the town its independence from church authority at this time, and the friary house was given to the mayor and burgesses of Reading as a new guildhall. Although the town initially suffering an economic downturn following the dissolution owing to the lack of pilgrims and visitors, nevertheless the town prospered as a centre of the wool and cloth trade.

3.6 As a major thoroughfare and part of the planned medieval town, both sides of Friar Street would have been occupied by shops and houses throughout the medieval period.

3.7 John Speed's 1611 Map of Reading shows the major elements of the medieval town (**Figure 3**). The Friary site (marked A) stands at the western end of the street (now known as Friars Street) leading to St Laurence's Church (marked D), with the Abbey beyond on the east side of the town (marked H). The approximate location

⁷ Ditchfield & Page 1923.

⁸ Ditchfield & Page 1907.

of the Site is ringed in red. Reading had become a thriving and prosperous cloth town by this date, with a population of over 5000⁹.

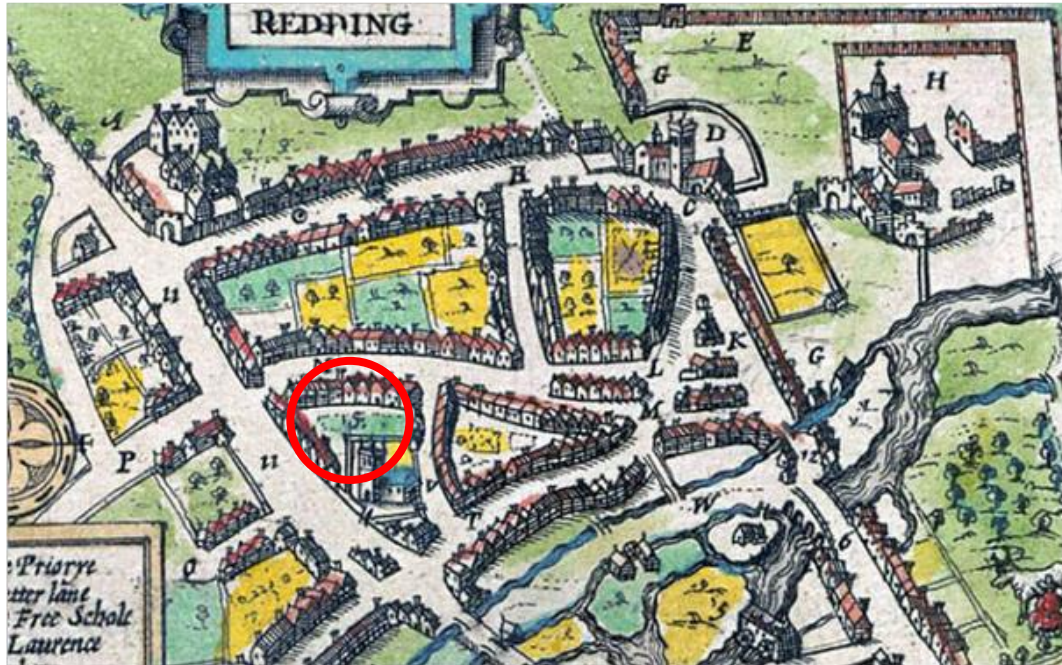


Figure 3: 1611, John Speed's Map of Reading

3.8

As a result of the Siege of Reading in 1642, during the course of the English Civil War, in which the royalist garrison of the town was defeated, town was penalised by heavy taxation. The cloth trade was particularly badly hit. The Kennet Navigation, completed in 1723, enabled barges and boats to travel as far as Newbury. Although an iron works had been built in the 18th century, and Simonds' Brewery, the first of several successful breweries for which the town became famous, opened in 1785, the town's prosperity did not fully return until the beginning of the 19th century (1810) when the Kennet and Avon Canal was completed, connecting London via the Thames at Reading with Bristol and the Bristol Channel. Two large companies were established in the town at this time: Suttons Seeds (1806) and Huntley & Palmers Biscuits (1822).

3.9

Transport links were further improved by first the arrival of the Great Western Railway in 1840, followed by the South Eastern Railway in 1849 and The London and South Western Railway in 1856. Reading railway station opened in 1840. A

⁹ Ditchfield & Page 1923.

contemporary map by Edward Weller shows the site of the newly built station and approach together with a new road linking the station with Friar Street (Figure 4). The approximate location of the Site is ringed in red.

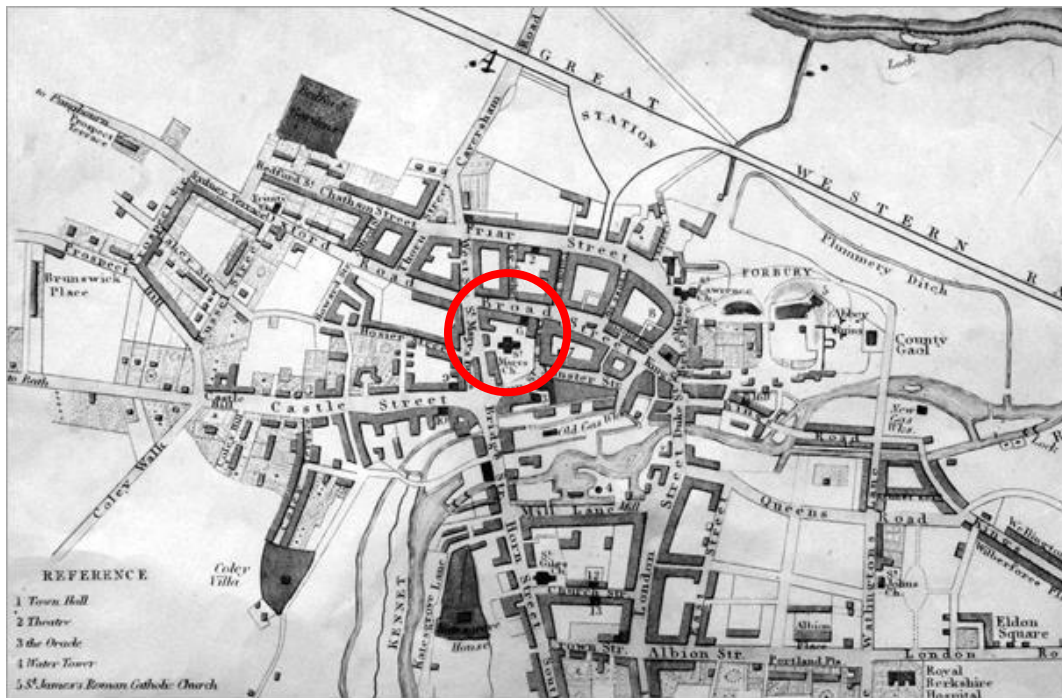


Figure 4: 1840. Edward Weller's Map of Reading

3.10 The censuses show an expanding population throughout the second half of the 19th century, increasing almost threefold from 21,500 in 1851 to 59,000 by 1901¹⁰. Reading became a county borough under the Local Government Act of 1888. Building to accommodate the expanding population included not only a proliferation of terraced suburban dwellings, but also commercial landmark building in the town such as the Board Schools, banks and shop premises, mainly utilising coloured brick with terracotta dressings¹¹.

3.11 Based on an assessment of their character and appearance, the buildings on the site appear to date from the late 19th century or early 20th century. However, buildings of a similar footprint are visible on earlier mapping suggesting that the site has been continually occupied for a long period. One of the map showing earlier built form is the 1879 OS Map (**Figure 5**). This shows buildings on the site and

¹⁰ ancestry.co.uk

¹¹ Tyack, Bradley & Pevsner 2010.

elsewhere in Broad Street and show the Independent Chapel set back from the road edge. A late 19th century photograph shows this arrangement but does not include the site itself (**Figure 6**).

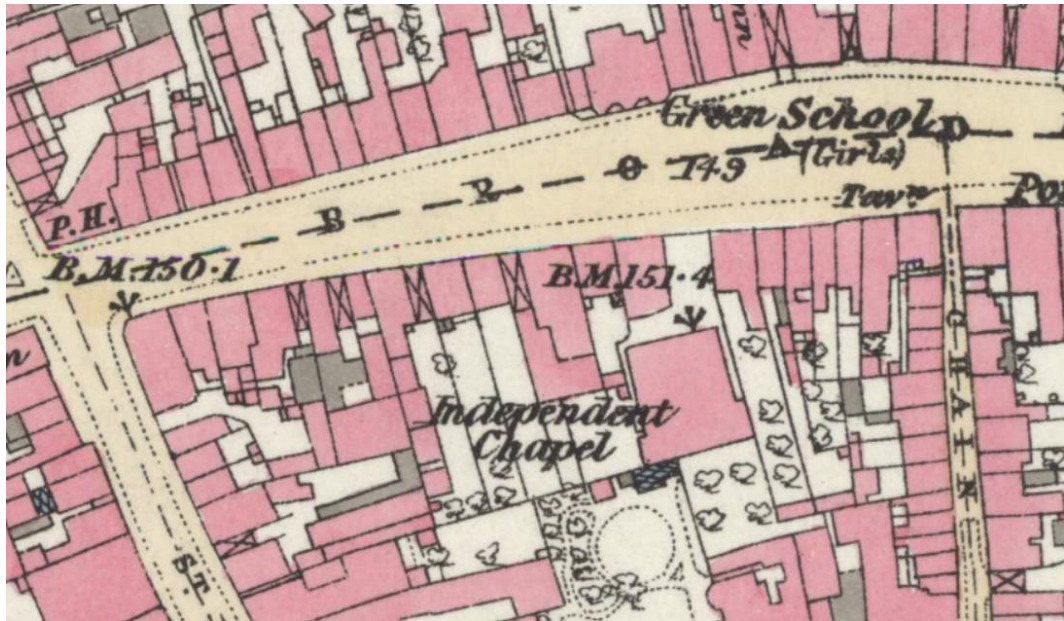


Figure 5: 1879 OS Map (surveyed 1875). Reproduced with permission of the National Library of Scotland



Figure 6: Late 19th century photograph of the adjacent Independent Chapel © Berkshire History

3.12 The 1895 Goad Insurance Fire Plan (**Figure 7**) provides more information and shows no. 86 as a relatively small building on a square footprint with no.87 featuring an additional structure to the rear. By this time the Independent Chapel to the east of the site has been redeveloped and it would seem likely that the present day buildings on the site were also constructed.



Figure 7: 1895 Charles E Goad Ltd. Insurance Plan © British Library

3.13 A single sketch and two historic photographs of the site have been sourced (**Figures 8-10**). These demonstrate the high levels of alteration undertaken to the site and wider area throughout the 20th century. Of particular relevance are the following points:

- The terrace containing the site was originally much longer and included nos.88 and 85 (both of which have now been significantly altered and are no longer visually in keeping):

- The original shopfronts have been replaced with modern detracting shopfronts;
- The original window heads appear to have been altered;
- Original windows have been replaced; and
- The rear of the buildings has been entirely eroded through the provision of numerous large scale rear extensions.



Figure 8: Sketch of c.1885 showing part of the terrace of the application site and, to the left, the location where the current 1892 frontage of the Congregational Chapel now sits (source: Reading Library – Archival Photos)



Figure 9: Historic photograph (c.1905) showing the application site and wider street view



Figure 10: Historic photograph (date unknown) showing the application site

3.14 Though further development to the rear of the site and in the wider area is present, the site remains broadly as per earlier mapping on the 1934 OS Map (**Figure 11**) and later mapping.



Figure 11: 1934 OS Map (surveyed 1931). Reproduced with permission of the National Library of Scotland

4. Statement of Significance

Assessment of Significance

- 4.1** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected (paragraph 189 of the NPPFs) is therefore fundamental to understanding the scope for and acceptability of change
- 4.2** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and, where relevant, it comments on the contribution of setting to significance. In accordance with paragraph 189 of the NPPF, the descriptions are proportionate to the assets' significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 4.3** With regards to matters of setting, the identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment) and with the tabular methodology at **Appendix 2**.

Church of St Mary (grade I)

- 4.4** The grade I listed Church of St Mary (UID: 1113573) was first designated in March 1957. While one of the older styles for identification purposes only, the list description for this asset provides a good description of the building and its various phases of construction. In full it reads:

"Church of England. Like St Laurence's, a Reading landmark. Nothing retains of the Norman Church except a doorway built into north wall. Built in distinctive

materials: a chequerwork of quarry and quaternary flint and Taynton stone ashlar with tiled roofs.

Prominent west tower, hall church with four bay aisled nave and projecting chancel. The tower, 1550-53, is of three stages, crenellated and with polygonal angle buttresses capped by crocketed pinnacles.

The south aisle with projecting gabled porch in third bay is 5+2 (later) bays with dividing buttresses and Decorated-style tracery.

Three bay chancel (1864) in Early English style with bill flowers to moulded cornice. (Built in knapped and squared flint).

To north vestry projects with door to east and older polygonal turret with decorated cornice.

The north transept is indicated by a gable. Three bay north aisle (1871, Joseph Morris) with decorated tracery.

Interior: south arcade circa 1200 with chamfered soffits and alternately scalloped and fluted caps (Pevsner sees these as transitional waterleaf) North arcade has a circa 1300 1½ bay return screen to form transept. Arch brace truss roof with scissor braces above. Four dormers in south slope of nave roof. Screen dated 1631 under west tower gallery has cusped panelling. Memorial to William Kendrick (died 1635). Memorial by Flaxman to John Monck (died 1809)."



Figures 12 and 13: Grade I listed Church of St Mary

4.5

As a grade I listed church and landmark in Read, this building is of considerable architectural, historic and archaeological interest. The fabric of the building is

exceedingly important containing Norman, c.1200, c.1300 and 16th and 19th century phases which contribute towards an understanding of the development of the church. As a prominent market town church which has remained in use since at least the 11th century, the building also lays claim to considerable communal and spiritual value which makes a strong positive contribution to the significance of the asset. Further associative interest is derived from associations with well-known locals including the Kendrick family (patrons of the town and founders of Kendrick Boys' and Girls' Schools) and Joseph Morris (Berkshire County Surveyor between 1872 and 1905).

4.6

Due to modern development in the surrounding area it is the church's churchyard which is now the key element of the setting of this asset, providing a green oasis in which to experience and appreciate the ancient place of worship. A number of features within the churchyard are separately designated including:

- Group of 4 churchyard tombs north of St Mary's Church (grade II, UID: 1156950);
- Group of 4 churchyard tombs east of St Mary's Church (grade II, UID: 1321886); and
- Jubilee Cross (grade II, UID: 1113574).

4.7

While not capable of being affected by the proposals in their own right, these features make a strong positive contribution to the significance and setting of the grade I listed church. In a similar sense, historic buildings (and surviving components of medieval street pattern) surrounding the church allow the church to be appreciated amongst a broadly historic context. However, the urbanisation of the area, intensification of traffic and the surrounding roads are negative features.

4.8

Key views of the church are from the west towards its prominent chequerboard tower and from the south where the church can be seen sat within its well grassed and treed churchyard, surrounded by tombs (some of which are designated) and the Jubilee Cross (grade II).

4.9

The area to the north of the church (bar Church House and the adjacent building to the west) includes the back of house areas of Broad Street fronting buildings. The character and appearance of this part of the setting of the grade I listed church is severely deteriorated and while historic frontages survive to Broad Street it is now

modern rear extensions and bin storage areas that are most prominently appreciated here. This part of the setting of the church does not contribute to or reveal the significance of the asset and, due to its present condition, draws attention away from the church. This is to such an extent that this part of the setting could be considered to detract from the significance of the church .



Figures 14 and 15: View from the church towards the site (left) and from the north towards the church taking in the bin storage area in the foreground

St Mary's Butts/Castle Street Conservation Area

4.10 The St Mary's Butts/Castle Street Conservation Area was first designated in 1972 and a Conservation Area Appraisal adopted by RBC in 2008. The Conservation Area Appraisal (CAA hereafter) provides a thorough assessment of the historic background of the area which is not replicated here for brevity. The area focuses on the crossing of two north/south and east/west roads with St Mary's Church and Churchyard forming a key open space and landmark building within the area.

4.11 The CAA goes on to note that the special interest which justifies designation of the conservation area derives from a number of features, namely:

- Its position at the Saxon centre of Reading at a cross-roads of the main east-west and north-south routes through the town, just north of an original crossing point across the River Kennet, upon which river the town grew.
- The Grade I listed Church of St Mary in St Mary's Butts, a Reading landmark, originally Norman, and mentioned in the Domesday Book, but now mostly Medieval in origin, which is the focal building of the Conservation Area.

- St Mary's Churchyard, an important open space in the centre of town.
- Other important landmark buildings including the Grade II* listed St Mary's Church in Castle Street.
- The architectural and historic interest of the area's other buildings, with examples dating from the sixteenth century to the present day, but the majority of which show a coherence of scale within their various architectural styles.
- The presence of some of the oldest surviving buildings in Reading, including 3 existing public houses ("The Allied Arms", "The Horn" and "The Sun") dating from the 16th and 17th centuries, and the former "Shades" public house at 15 Gun Street dating from the 17th century. "The Sun" is also reputed to be on the site of the former Reading Gaol.
- Important Grade II* listed buildings at 15 and 17 Castle Street (both 16th century), 19 Castle Street (early 18th century), 63 Castle Street (circa 1750) and the Church of St Mary, Castle Street (1798).
- 35-37 St Mary's Butts ("County Delicacies") and 57 St Mary's Butts ("The Allied Arms"), which also date from the 16th century.
- The Queen Victoria Jubilee Fountain in St Mary's Butts, a local landmark.
- The Grade II* listed Holy Brook Culvert to the rear of numbers 1- 31(odd) Castle Street, plus the remainder of the Holy Brook which links the rear of the properties on the south side of the conservation area.
- A high percentage of listed buildings, listed individually and for their group value, dating from before 1875.

4.12 The character of the conservation area is primarily made up from two to three storey buildings, constructed up against the pavement edge. The street pattern retains elements of its medieval origins (providing historic legibility and interest) and this assists in the understanding of this being the original core and market place of the town *"before the advent of Reading Abbey "drew" the centre of gravity of the town and its market place to the western end of Friar Street."*

4.13 In order to reflect the varying character of the conservation area, the CAA divides it into character areas with the application site being closest to 'Area 1 St Mary's Church and Churchyard'. The CAA describes this character area as:

"St Mary's Church lies at the heart of the Conservation Area, and is situated within its largest public open space. It is the most pedestrian-friendly part of the Area. The area is defined by walls round three sides and part of the fourth (north) side, with buildings facing it at the eastern end of the north side. The Grade 1 listed church, the open, people-friendly character of the churchyard around it, and the pedestrian routes through and around the space, are a marked contrast to the close-knit buildings beyond heavily used roadways outside the churchyard.

The churchyard was not always open to view as it is now, because from the sixteenth to the mid nineteenth centuries there were originally almshouses on its southern and western boundaries. Their removal clearly benefited the now open character and appearance of this part of the Conservation Area."

- 4.14** Features of Character Area 1 which make a positive contribution to the historic character and appearance of the conservation area primarily relate to the church and churchyard which dominate the core of the historical centre of Reading, the generally well maintained character of the area, good pedestrian links through the area and the potential to shop and sit in the churchyard.
- 4.15** The CAA also identifies negative features which impact on the historic character and appearance of this part of the conservation area. These negative aspects include noise and fumes from a constant stream of vehicular traffic and the *"unattractive, if well-used pedestrian links to and from the west of the site across a heavily trafficked St Mary's Butts."*
- 4.16** The setting of the conservation area is markedly different from the conservation area itself. To the east, south and west built form is primarily modern whereas to the north a more historic setting survives with the backs of building fronting on to Broad Street.
- 4.17** This as noted in the CAA which summarised this stating:
- "The Conservation Area therefore represents an historic oasis surrounded on three sides by post 1970s and later developments, and only to the north by the more historic Broad Street, which however backs on to the Conservation Area, often in the form of rear service yards and parking spaces which are accessed from St Mary's Butts adjacent to St Mary's Church."*

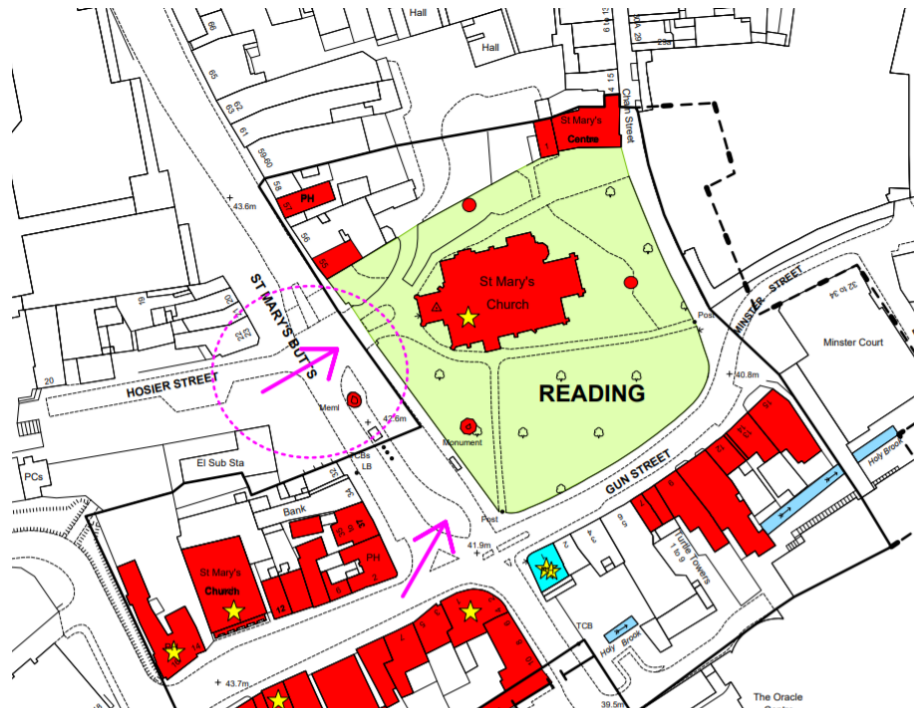


Figure 16: Conservation Area townscape map © RBC showing Significant Open Space/Green Area (green), Listed Buildings (red) and Significant Views (pink)

4.18 The area to the north of the conservation area, while more historically legible than other areas, does not make any contribution to the significance or appreciation of the conservation area. The character and appearance of this part of the conservation area's setting is significantly deteriorated and run down due to its back of house use and while buildings may be historic the most readily appreciable components typically relate to modern rear extensions to the earlier buildings which are best experienced from Broad Street. In this sense the application site could be considered to detract from the conservation area. There are no key views out from the conservation area to the north but there are good views from this area towards the church and churchyard. This was also noted in the CAA where it stated:

"The Conservation Area is therefore very much an historic enclave surrounded by much more modern developments which do not provide significant views out of the area, but which generally benefit from good views in to it. It is situated at the centre of some very active parts of the town, which people walk across and often rest in, and (apart from the grassed area outside the Civic Offices) provides the only public green area at the western end of the town centre."



Figures 17 and 18: Views from the churchyard and conservation area north towards the site and rear of properties along Broad Street

Congregational Church and 89 and 89a Broad Street (grade II)

4.19 The Congregational Church and 89 and 89a Broad Street (UID: 1321954) was first listed December 1978. In full the list description reads:

"Included for its interior. Exterior from Broad Street (Nos 89 and 89A) is the annexe of 1892. 2 and 4 storeys. Red brick. 3 unequal bays with 3 windows, tower and 2 windows. Stone dressings, quoins and strings. Large archway under tower with moulded soffit and rustication, bolection upper part. Shaped pediment over with cartouche inscribed "Broad Street Independant Chapel" and dated on frieze below "1662, 1892, 1800". Modern ground floor shops flank tower. Tower capped by octagonal turret. The chapel itself is set well back in a courtyard at rear of annexe. Probably the 1800 rebuild with alterations - hipped slate roof 2 storey brick block with 3 arched windows. Interior a good example of a galleried non-conformist chapel in a prosperous market town although not as good as St Mary's Castle Street (qv). Roughly square with encircling galleries and an organ over the dais. Panelled galleries, late Victorian pews, angled under galleries, domed ceiling with modillion cornice. Central window of North Gallery has copy of Burne-Jone's "Light of the World".

4.20 Since the time of listing it is clear that the building has undergone considerable change with the chapel now in retail use as part of Waterstones which occupies the majority of the structure (save a single unit on the Broad Street elevation). The large galleried chapel survives internally but is now used as part of the publicly accessible areas of the shop.



Figures 19 and 20: 1802 Broad Street elevation and interior within the former chapel

4.21 As noted above, the list description specifically notes that the building was “included for its interior”. This part of the structure, particularly the galleried non-conformist chapel, is of clear architectural and historic interest derived from the quality and character of the chapel itself and historic associations with non-conformism in a prosperous market town. Changes to convert the former chapel into commercial use have affected the quality and character of its internal spaces, for example resulting in the loss of the Victorian pews mentioned in the list description.

4.22 While the building’s significance primarily relates to its earlier c.1800 interior, the exterior of the building fronting onto Broad Street remains of some architectural interest as a good quality and decorative frontage of 1892. This part of the building is of some historic interest due to its qualities as a late 19th century commercial frontage which retains the majority of its original fabric and character and which remains in commercial use.

4.23 The setting of the grade II listed former chapel is characteristic of its town centre location. Buildings along Broad Street date from a wide variety of periods and encompass a wide variety of styles and scales. While taller buildings are present on

Broad Street built form either side of the building remains generally at or lower than the building's eaves meaning that the prominent central tower remains dominant in close range views.



Figure 21: View of the grade II listed building along Broad Street (left) and view of the rear of the building (right)

- 4.24** To the rear of the grade II listed building the context is very different. It is not possible to appreciate the significance of understand the history of the former chapel due to the large scale rear additions and modern built form present and the back of house character to the surrounding land does not provide a high quality outlook for the building.
- 4.25** While forming part of the late 19th century surroundings of the former chapel, the existing buildings on the application site could not be considered capable of enhancing or better revealing the significance of the grade II listed building. As such, the existing buildings on the site are a neutral component of the setting and significance of the grade II listed building.

Church House and building west (both grade II)

- 4.26** To the south east of the application site are the grade II listed Church House (UID: 1156954, first listed March 1957) and 'Building west of Church House' (UID: 1321887, first listed December 1978). These two buildings have been grouped together for the purposes of this assessment given their shared siting and the

similarities of their date, form and character. The list descriptions for these assets respectively read:

"Early-mid C18. 2 storeys and attic. Altered. South front red brick, moulded painted string over 1st floor windows. plain parapet with stone coping. Old tile hipped roof, chimneys stunted. 3 dormers with moulded cornices, casements. 5 windows on 1st floor, 3 on ground floor, glazing bar sashes. Modern double (4 panel) door with rectangular fanlight of radiating and curved glazing pattern. Wooden doorcase, panelled reveals, panelled pilasters and elaborately carved scroll brackets with supports of cupids and inverted accanthus, crowned by modern segmental open pedimented hood with panelled soffit. Narrow window each side of doorcase. A good modern adaptation. The entrance originally was from the west (altered 1931). Original glazing bars and internal cornice retained in 1st floor north-west room to back. Original modillion cornice survives on pebbledash west front. Interior: staircase with wide oak moulded rail, circa 1740s with ramps and dado and wide turned balusters; continued to basement; 2 pedimented doors to stairs, one segmental, the other triangular. Ground floor front room has fine eared chimneypiece with pulvinated frieze. The room above has marble fireplace with Adam-style surround with swagged frieze having cupids and a lion. In the attic, partition wall retains part of a re-used moulded jetty."

"Late C18 altered and linked to Church House. Red brick with occasional grey headers. Moulded wooden eaves cornice. Old tiled roof. Tall central chimney removed. 2 ranges of windows, sashes 1st floor, to left a square modern oriel, panel over door; 4 light casements on ground floor with segmental over arches. Tile hung gable tip to south (facing churchyard) with moulded wood gutter and 1 range of windows."

4.27

The significance of these buildings primarily relates to a combination of their architectural and historic values. These values strongly relate to the buildings' surviving 18th century fabric and character. With regards to Church House this includes external features including the Classically detailed south frontage, the original modillion cornice to the west elevation (originally the front) and internally surviving detailing including a good quality staircase of c.1740. The building to the west of Church House is more modest in its scale and form and possesses a more vernacular character. The buildings are of historic interest demonstrating the 18th

century development of this part of Reading and due to their close proximity and relationship with the grade I listed church.

- 4.28** Church House may also be of some archaeological potential given that the list description suggests part of a re-used moulded jetty can be found within the attic. This could be suggestive of the building either having an earlier core or origins though investigative works would be required to clarify this.



Figures 22 and 23: View of Church House and the separately listed 'Building to the west of Church House' (left) and a view of these buildings from the west towards the larger scale modern built form of John Lewis beyond

- 4.29** The setting of both buildings is very different from when they were constructed in the 18th century. While the church and its churchyard remains a consistent and positive element of the setting of these assets the surrounding areas have seen considerable change. The church's former vicarage (located north of these buildings and seen on historic maps shown in Section 3) has been demolished, the two formerly separate buildings have been linked and surrounding built form (to the rear of Broad Street and to the east of Chain Street) now dominates the surroundings of these assets (**Figures 22 and 23**).

- 4.30** It is only the modern rear parts of the application site which can be experienced in conjunction with these two listed buildings due to the lack of intervisibility between this part of Reading and the Broad Street frontages. As such, the existing buildings on the application site could not be considered capable of enhancing or better revealing the significance of the grade II listed buildings. They therefore form a neutral component of the setting and significance of these assets.

86-87a Broad Street (Non-designated Heritage Assets)

4.31 Nos.86-87a do not appear on Reading's List of Locally Important Buildings but, as part of pre-application advice, the Council have asserted that they consider the buildings on the site to be non-designated heritage assets.

4.32 Non-designated heritage assets are defined by paragraph 039 of the PPG¹² as:

"Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets."

4.33 The same paragraph goes onto note that:

"A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets."

4.34 As such, it is clear that non-designated heritage assets are not common and that, even where a building could lay claim to a little heritage significance, that does not mean that it should be considered a non-designated heritage asset. In this case the heavily altered and extended character of the buildings suggests that, in accordance with the definition provided by the PPG, these buildings should not be considered heritage assets.

4.35 The buildings clearly do not meet the criteria required for inclusion on Reading's own Local List (as evidenced by them not being included upon it). The criteria for inclusion on the Local List is presented at Appendix 2 of the Local Plan notes that for buildings dating between 1840 and 1913 buildings need to be *"of clearly-defined significance in the local context and where elements that contribute to its/their heritage significance remain substantially complete"*. The Appendix goes on to note the following criteria:

- Historic Interest: Factors including historic association and social and industrial importance.

¹² Paragraph 039 of the Practice Guide. Reference ID: 18a-039-20190723

- Architectural Interest: Factors including sense of place, innovation and virtuosity and group value.

4.36 Nonetheless, RBC have asserted that the buildings are non-designated heritage assets and, for the purposes of this report, they are treated as such.



Figures 24 and 25: Broad Street elevations of nos. 86-87

4.37 With regards to the frontage buildings, the design, materials and form of the buildings as a red brick terrace with limited architectural detailing represents standard town centre construction from the late 19th century. While making use of a locally appropriate red brick and those areas being generally attractive and contributing to a broad sense of place along the road, there is nothing particularly unusual or advanced about the buildings. It is relevant to note that even the Conservation Officer described the buildings as “*typical of their period*” (follow up pre-application advice, page 11).

4.38 The buildings are not of any technological or artistic innovation for their period (during a time when the Arts and Crafts Movement and Art Nouveau were at the forefront of fashion) and they are not of landmark or focal quality. In addition, as identified in the preceding section, very little 19th century fabric now survives due to the various alterations – this is essentially two storeys of brickwork with a slate roof and chimneys above given that original shopfronts and rear have been entirely altered and eroded.

4.39 To the rear sits a separate (though interconnected) structure which appears to be late 19th century in date and constructed for industrial purposes, perhaps as an outbuilding or workshop to the Broad Street fronting structures. While potentially of

some historic interest due to their former use, these structures are of no particular architectural interest.

- 4.40** The Broad Street buildings do serve as a reminder of the late 19th century development of Broad Street (and some historic interest derives from this), but the same could be said about other similarly dated built form located along this road. There are no known historic associations or factors of social or industrial importance which would elevate the historic interest of these buildings.



Figures 26 and 27: Close up of one of the buildings in the terrace (left) and view of the rear of the buildings (right)

- 4.41** Overall, the buildings on the site could lay claim to some heritage value, however, this is clearly of a limited level of local interest and there is no question that the value has been eroded by later additions and alterations which have considerably affected the authenticity and integrity of the buildings and the their potential heritage value. The interest of the buildings primarily relates to a low level of architectural value (limited to the first and second floor and surviving chimneys) and a similarly low level of historic interest (related to how the buildings help, amongst others, represent the late 19th century development of Broad Street).
- 4.42** As part of the follow up pre-application advice Conservation Officer comments requested clarity on the interiors of the buildings with regards to their heritage value. However, the interiors of non-designated heritage assets are not subject to

planning control (i.e. not protected in the same way as the interiors of listed buildings are) meaning that alterations to the interior could be undertaken at any time without the requirement for permission from the Local Planning Authority. This matter was established as part of recent case law (Travis Perkins (Properties) Ltd V Westminster City Council & Ors¹³). Aside from this, the interiors of the building are recorded as part of the submitted Level 2 Building Record.

¹³ [2017] EWHC 2738 (Admin).

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including (where applicable) effects on the setting of those assets. Where relevant with regards to setting, it equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in **Appendix 2**.

Impact Assessment

Façade Retention of 86-87 Broad Street and Northern Block

5.2 As identified in the preceding section, the existing buildings on the site, 86-87 Broad Street and rear additions, are of some limited local heritage value which can be summarised as a low level of architectural value (limited to the first and second floor and surviving chimneys of the Broad Street frontage) and a similarly low level of historic interest (related to how the buildings help, amongst others, represent the late 19th century development of Broad Street).

5.3 As noted in the Introduction, previous pre-application proposals sought total demolition of these buildings. In response to concern raised by RBC, the current proposals seek to undertake a scheme of façade retention of the first and second floors of the Broad Street frontage. In addition to reconstruction of a new building behind the retained façade, proposals seek to:

- Reintroduce historically influenced shopfronts to the ground floor;
- Introduce residential accommodation within the roof structure alongside the retained chimneys which flank the site; and
- Replace existing windows with new timber double glazed units to match the existing windows.

5.4 While the proposals would result in the loss of some historic fabric associated with the non-designated heritage assets (i.e. all built form behind the retained façade),

the proposals retain the most significant element of these buildings, namely the first and second floor of the Broad Street frontage and two of the three surviving chimneys. As a result of this, while the majority of the buildings would be removed, the key architectural elements of the buildings and their historic interest (related to how the buildings help, amongst others, represent the late 19th century development of Broad Street) would be preserved by the proposed development. Based on professional experience, the wholly limited heritage interest of those parts of the buildings to be removed does not weigh significantly in favour of their retention.

- 5.5** The application is also supported by a Level 2 Building Record of the existing buildings on the site. While this does not provide justification for the level of demolition proposed it does mitigate against the loss by retaining a clear record of those elements now proposed to be removed.
- 5.6** While façade retention was not proposed as part of earlier pre-application proposals, it was discussed with RBC officers at the time and it is understood that such a scheme would alleviate their concerns regarding total demolition.
- 5.7** Following façade retention, as noted above, proposals to the Broad Street frontage entail a variety of components including provision of accommodation within the roof structure, introduction of new shopfronts to the ground floor and the replacement of existing windows.
- 5.8** In order to maximise the provision of residential accommodation on the site, the proposals seek to replace the existing roof structure of the Broad Street frontage with a mansard to provide additional accommodation. This is proposed to be achieved in a traditional manner with a slate clad mansard and series of six dormer windows, aligned with and reduced in scale in comparison with, the fenestration of the retained façade below. The introduction of additional accommodation to the Broad Street frontage in this manner is entirely appropriate for the character, appearance and significance of the historic buildings.
- 5.9** Proposals also seek to retain the two flanking red brick chimneys on the site to further preserve the traditional character of the roofscape. One chimney present within the roof scape (off centre to the right hand side) would be removed. While this would result in the loss of some historic fabric, this minor change would not

affect the significance of the non-designated heritage asset given that the overall traditional character of the building and roofscape would be preserved.

- 5.10** At ground floor, proposals include the introduction of replacement shopfronts. As noted elsewhere in this report, the existing shopfronts present to the Broad Street frontage of the site are poor quality and modern additions which detract from the historic character of the buildings. Proposals seek to introduce a series of three new coherently designed shopfronts to the retained frontage. The two left hand side shopfronts would provide access into the commercial ground floor unit/s while the right hand side shopfront would serve the residential accommodation on the site.
- 5.11** The shopfronts themselves have been influenced by historic shopfront design featuring fascia panels, large picture windows with vertical and horizontal bars, stone piers separating the shopfronts, projecting signage and fabric awnings. These historical influences ensure that the shopfronts relate to the above retained historic façade positively while also representing high quality modern shopfront design and materials including decorative metal screens and panelling (including a chequerboard pattern designed to reflect the design of the grade I listed Church of St Mary).
- 5.12** The final change to the Broad Street frontage includes the replacement of the existing deteriorated windows with new high quality timber double glazed units which would be designed to match the existing windows. The introduction of new timber windows works would preserve the architectural qualities of the façade while enhancing the thermal and acoustic performance of the building.
- 5.13** Overall, based on the above assessment, the physical alterations to the non-designated heritage assets on the site would preserve their primary heritage values due to the retention of key elements of the buildings, the enhancements secured and the building recording undertaken.
- 5.14** There are no statutory provisions (i.e. though legislation such as the Planning (Listed Building and Conservation Areas) Act 1990) for non-designated heritage assets. As such, the primary consideration is Paragraph 203 of the NPPF. The policy tests set out for non-designated heritage assets are clearly more limited than those relating to designated heritage assets. All that is required by paragraph 203 in respect of non-

designated heritage assets is that the effect of an application on the significance of that assets should be taken into account¹⁴. In full, this policy notes that:

*"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 affect directly or indirectly 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."*¹⁵

- 5.15** In this case, for the reasons identified above, there would be no identifiable harm under paragraph 203 of the NPPF and, in accordance with the requirements of this policy, the effect of an application on the significance of the site's non-designated heritage assets has been taken into account. However, should the Council perceive there to be some harm resulting from the façade retention, this could only be a low level of limited harm, and given the low level of significance of these assets, would be convincingly outweighed by the benefits of the development (which include improvements to shopfronts, enhancements to setting of listed church and conservation area to the rear, and other public benefits including the delivery of new homes, addressed elsewhere in the submission).
- 5.16** As noted in the preceding section, the existing buildings on the site do not contribute to or better reveal the significance of the identified listed buildings and conservation area. As such, the demolition of these buildings behind the retained Broad Street facade would not result in any harm to the significance or setting of these assets.
- 5.17** The Broad Street frontage of the site is only appreciable within the setting and context of one of the identified heritage assets, the Congregational Church and 89 & 89a Broad Street (grade II). As noted in the preceding section, while this building is noted as being included on the list for its interior, the 1982 Broad Street frontage of the building is also of architectural and historic interest. The façade retention and other works proposed to the site's Broad Street frontage would not result in any effect on, or change to the appreciation of, the galleried non-conformist chapel of the building (only appreciated internally). There would be a minor visual change

¹⁴ Paragraphs 44-46 of *Travis Perkins (Properties) Ltd V Westminster City Council & Ors* [2017] EWHC 2738 (Admin)

¹⁵ It is relevant to note that when dealing with non-designated heritage assets reference to 'less than substantial' and 'substantial' harm would not be correct. Paragraph 203 makes no mention of either substantial or less than substantial harm, instead, that terminology is reserved for designated heritage assets.

within the setting of the building along Broad Street due to the changes to the site's shopfronts and the introduction of an additional floor of accommodation within the roof structure.

- 5.18** These changes are wholly minor in the context of the streetscene and setting of the Congregational Church and 89 & 89a Broad Street. The minor increase in height proposed on the site relates well to the already varied scale of built form along the street (which contributes to the rich and varied townscape of Broad Street) and the minor height increase would not dominate the listed building, the decorative roof of which far exceeds the ridgeline of the development. As such, the proposed development would not result in any appreciable change to the character of this asset's setting and the minor visual change along Broad Street would not result in an overly prominent element of the already varied setting of the listed building. Significantly, key views of the grade II listed building (direct views south towards the building where its decorative frontage can be best appreciated) would undergo only wholly limited change in the periphery. The proposed development would not obscure the listed building in any views (either static or transient) and there would be no change to the important and decorative skyline and silhouette of the building.
- 5.19** Overall, the proposed works to the northern block of the site would therefore have no effect on the significance or setting of the grade II listed Congregational Church and 89 & 89a Broad Street.

Southern Block Replacement Built form

- 5.20** The proposed replacement built form to create the southern block can be summarised as a comprehensive redevelopment of the rear part of the site which seeks to provide high quality accommodation which is sympathetic to the significance and setting of surrounding heritage assets.
- 5.21** The southern block has been designed with muted tones in response to the significant heritage assets located to the south and makes use of dark grey brick, hit and miss patterns and patinated bronze reveals to windows. As noted in the preceding section, it is the site's southern block which has a greater potential to result in change within the setting of heritage assets. Here the development would be appreciable within the context of:

- Church of St Mary (grade I);

- St Mary Butts/Castle Street Conservation Area;
- Church House and the building to the west (both grade II); and
- The rear of the grade II listed Congregational Church.

5.22 As identified in the preceding section, this part of the assets' settings (in particular the church and conservation area) does not contribute to or reveal their significance. Due to its present condition this part of the assets settings draws attention away from them to such an extent that, with regards to the grade I listed church, this part of the setting could be considered to detract from the listed building's significance. Redevelopment of the rear of the site offers a clear opportunity for enhancement with the setting of these assets.

5.23 It is acknowledged that built form proposed on the rear block is of a larger scale and massing than existing built form. However, this is not considered to be out of keeping with the massing of built form in the wider area (for example the John Lewis building). In addition, the massing has been carefully considered and steps back into the site, away from the assets, allowing a transition between the tallest element of the scheme (5 storeys) and lower development present.

5.24 The architecture of the proposed development also carefully responds to and respects the sensitive heritage context by providing a more muted character with high quality but simplistic detailing.

5.25 Importantly, the proposed development, while resulting in a change within the setting of the assets, would not be visible to a detrimental degree in any key views associated with the listed buildings and conservation area:

- **Church of St Mary:** Key views of the church are from the west towards its prominent chequerboard tower and from the south where the church can be seen sat within its well grassed and treed churchyard, surrounded by tombs (some of which are designated) and the Jubilee Cross (grade II). There would be no change to these key views as a result of the proposed development given the distances involved and intervening built form.
- **St Mary Butts/Castle Street Conservation Area:** Key views within, into and out of the conservation area are identified within the adopted conservation area appraisal (an extract of which is provided at Figure 16 of this report). Due to the orientation of these views and intervening built form

the proposed development would feature in any of these key views and, as such, these important views would not undergo any change.

- **Church House and building to the west:** Key views of these two assets are from the south where their front elevations can be best appreciated. The proposed development would feature in the periphery and background of these views. However, due to its siting and the architecture of the development, the replacement built form would not obstruct or impinge upon these views and the back of house character of the site would be enhanced in comparison to the existing situation.
- **Congregational Church and 89 & 89a Broad Street:** Key views of this asset are from Broad Street (or internally viewing the galleried chapel) and these will not undergo any change as a result of the rear block. It is not possible to appreciate the significance or understand the history of the former chapel to the rear due to the large scale rear additions and modern built form.

5.26 By virtue of the reasons identified above, the proposed development of the rear block would not dominate or encroach upon the identified assets and would not result in any competition with or distraction from them with all key views remaining unaltered. While there would be a change to the built surroundings of these assets as a result of the development of the rear block, this change if found to be a wholly positive one due to the considerable visual improvement to the current back of house area which would result in an aesthetic enhancement within the settings of these assets. There would be a marked improvement to the general character of this part of the setting of the assets, in particular the grade I listed church.

Summary and Policy Compliance

5.27 This Heritage Statement has satisfied the requirements of paragraph 194 of the NPPF insofar as it provides a proportionate assessment of the significance of heritage assets affected by proposals. It then goes on to assess the impact of proposals on that significance.

5.28 As identified, the application site falls within the setting of a number of designated heritage assets, namely:

- The Church of St Mary (grade I);
- St Mary Butts/Castle Street Conservation Area;
- The Congregational Church and 89 & 89a Broad Street; and
- Church House and the building to the west (both grade II).

5.29 With regards to these assets, while resulting in a change within the setting of the assets, the proposed development will not cause harm to their significance or an appreciation thereof. In addition, the works to the rear of the site would amount to a considerable visual improvement to the current back of house area which would result in an aesthetic enhancement within the settings of these assets. As such, it is found that the proposed development would fall outside the remit of paragraphs 200-202 of the NPPF insofar as the development would not result in any harm to, or loss, of significance. In this sense the proposed development is found to accord with the requirements of local planning policies EN1, EN3 and EN6. There would be preservation for the purposes of the decision makers duty under Section 66 of the Planning (Listed Building and Conservation Area) Act 1990.

5.30 With regards to the non-designated heritage assets on the site, as identified above, proposals seek to retain the most significant element of these buildings, namely the first and second floor of the Broad Street frontage and surviving chimneys. As a result of this, while much of the buildings would be removed, the key architectural elements of the buildings and their historic interest (related to how the buildings help, amongst others, represent the late 19th century development of Broad Street) would be preserved by the proposed development. There are also beneficial works to these structures through the improvement of ground floor shopfronts. As such, the proposed development would not result in any noticeable effect on the significance of the non-designated heritage assets meaning that there would be no identifiable harm under paragraph 203 of the NPPF and, in accordance with the requirements of this policy, the effect of an application on the significance of the site's non-designated heritage assets has been taken into account.

5.31 The proposed development is also found to accord with the requirements of local policy EN4 with regards to the non-designated heritage asset insofar as the proposals, while resulting in façade retention, would conserve the primary architectural and historic values of these structures and result in aesthetic enhancements to these assets with the development having been informed by its

context and setting. In addition, the non-designated heritage assets on the site have been fully recorded as part of a Level 2 Building Record submitted as part of this application. Overall, in accordance with the findings of the Planning Statement (WSP, 2021), the benefits secured by the proposed development are found to outweigh any perceived harm.

6. Conclusions

6.1 This Heritage Statement has been prepared in accordance with paragraph 189 of the NPPF and is submitted alongside an application relating to the redevelopment of 86-87 Broad Street, Reading. RBC have asserted that the buildings on the application site are non-designated heritage assets and the application site is located within the setting of a number of designated heritage assets, namely:

- Congregational Church and numbers 89 and 89a Broad Street (grade II)
- St Mary's Butts/Castle Street Conservation Area
- The Church of St Mary (grade I)
- Church House (grade II)
- Building to the west of Church House (grade II)

6.2 Other heritage assets in the vicinity of the site or located more widely have been scoped out of the assessment as the proposed development is not capable of affecting their heritage significance or setting.

6.3 The proposals, which entail a scheme of façade retention to the Broad Street frontage of the site, have been developed from an understanding of the significance of the heritage assets in the vicinity of the application site, with a particular focus on opportunities to retain the historic character of Broad Street while providing high quality interesting architecture on the site and an enhancement to the character of the rear of the site.

6.4 As identified in the preceding section, the proposed development would result in the removal of historic fabric behind the façade of the non-designated heritage assets. However, the scheme would preserve the key heritage elements of the assets (namely the architectural interest of the first and second floor of the frontage and historic interest associated with how these assets demonstrate the area's 19th century development). The scheme also secures aesthetic enhancements to these assets through the provision of replacement shopfronts and a full building record has been undertaken which mitigates the loss of fabric. As such, when considering the proposals to the non-designated heritage assets holistically, there would be no identifiable harm under paragraph 203 of the NPPF.

6.5

While resulting in a change within the setting of the identified designated heritage assets, the proposed development will not cause harm to their significance or an appreciation thereof. In addition, the works to the rear of the site would amount to a considerable visual improvement to the current back of house area which would result in an aesthetic enhancement within the settings of these assets. As such, it is found that the proposed development would fall outside the remit of paragraphs 194 to 196 of the NPPF insofar as the development would not result in any harm to, or loss, of significance. There would be preservation for the purposes of the decision makers duty under Section 66 of the Planning (Listed Building and Conservation Area) Act 1990.

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 195 and 196, and guidance on NPPG).¹⁶

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

¹⁶ 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

GPA3 Assessment: Historic England's guidance on setting

In assessing the effect of the proposed development on the setting and significance of designated heritage assets (namely the conservation area and a number of listed buildings), it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

Relevant Considerations	Church of St Mary (grade I)	St Mary Butts/Castle Street Conservation Area	Church House and building to the west (grade II)	Congregational Church and 89 & 89a Broad Street (grade II)
<i>Proximity of the development to the asset</i>	The Church of St Mary is located c.65m south of the application site	The boundary of the conservation area is located c.48m south of the application site	The Church House and building to the west of it (both grade II listed) are located c.45m south east of the application site	The application site is located in close proximity to this listed building, next door but one on Broad Street as an adjoining neighbour to the rear of the site.
<i>Proximity in relation to topography and watercourses</i>	The topography of the area is broadly flat and there are no water courses of relevance with regards to the setting or significance of the identified heritage assets			
<i>Position of development in relation to key views</i>	Key views of the church are from the west towards its prominent chequerboard tower and from the south	Key views within, into and out of the conservation area are identified within the appraisal. The	Key views of these two assets are from the south where their front elevations can be best appreciated.	Key views of the exterior of this building are from Broad Street looking south directly at its front

	where the church can be seen sat within its well grassed and treed churchyard, surrounded by tombs (some of which are designated) and the Jubilee Cross (grade II). There would be no change to these key views as a result of the proposed development given the distances involved	application site (and the proposed development) do no feature in any of these key views. The important views would therefore be preserved as a result of the proposed development	The proposed development would feature in the periphery and background of these views. The development would not obstruct or impinge upon these views and the back of house character of the site in these views would be enhanced in comparison to the existing situation	elevation. It is here that the architectural and historic interest of the 1892 frontage can be appreciated. Other key views are wholly internal taking in the galleried non-conformist chapel. Internal views of the chapel area would not be affected by the proposed development. Direct views of the building from Broad Street may undergo some change in the periphery but views of the listed building, either from directly in front of it or transient views along the street, would not be obscured by the proposed development.
<i>Prominence, dominance and conspicuousness</i>	While the rear of the site would include larger built form than existing, the proposed development would not be dominant within the setting of the listed building	While the rear of the site would include larger built form than existing, the proposed development would not be dominant within the setting of the conservation area	While the rear of the site would include larger built form than existing, the proposed development would not be dominant within the setting of these listed buildings	The proposed development would not be dominant within the setting of the listed building

<i>Competition with or distraction from the asset</i>	The proposed development would not compete with or distract from the church. The prominence of the church due to its age, scale and architectural, archaeological and historic interest would remain unaltered	For the reasons identified elsewhere, the proposed development would not compete with or distract from the conservation area	For the reasons identified elsewhere, the proposed development would not compete with or distract from the church.	For the reasons identified elsewhere in this table, the proposed development would not compete with or distract attention away from the grade II listed building which, on Broad Street, would remain prominent by virtue of its highly decorative frontage and roofscape
<i>Dimensions, scale, massing, proportions</i>	The proposed development entails a wholly minor increase in scale to the northern block (the Broad Street frontage which is retained behind the existing façade). The rear block comprises five storeys and while representing an increase over the existing massing on the site has been carefully considered so to relate well to the overall scale of built form in the wider area			
<i>Materials and design</i>	The proposed development can be considered to comprise two blocks linked by a narrow glazed corridor. The northern block includes the retained façade with improved shopfronts and accommodation within the rebuilt mansard roof. The rear block has been designed with more muted tones in response to the significant heritage assets located to the south and makes use of dark grey brick, hit and miss patterns and patinated bronze reveals to windows			
<i>Diurnal or seasonal change</i>	Matters of diurnal or seasonal change have been considered alongside the wider assessment of impacts			
<i>Change to built surroundings and spaces</i>	There would be a change to the built surroundings of this asset (as a result of the rear block of the development) but this change wholly positive due	There would be a change to the built surroundings of this asset (as a result of the rear block of the development) but this change wholly positive due	There would be a change to the built surroundings of this asset (as a result of the rear block of the development) but this change wholly positive due	There would be a change to the built surroundings of this asset. To Broad Street this would be a neutral change and to the rear of the site the change would be wholly positive due to

	to the enhanced architecture proposed	to the enhanced architecture proposed	to the enhanced architecture proposed	the enhanced architecture proposed
<i>Change to skyline, silhouette</i>	There would be no change to the skyline and silhouette of the church in any views as a result of the proposed development	There would be no change to any important elements of skyline within the conservation area	There would be no change to the skyline and silhouette of these buildings in any views as a result of the proposed development	There would be no change to the important and decorative skyline or silhouette of the building as a result of the development
<i>Change to general character</i>	The replacement of built form to the rear of the site would result in a marked improvement to the general character of this part of the setting of the listed church	The replacement of built form to the rear of the site would result in a marked improvement to the general character of this part of the setting of the conservation area	The replacement of built form to the rear of the site would result in a marked improvement to the general character of this part of the setting of these listed buildings	There would be no change to the general character of the surroundings of this assets which would remain to be appreciated within a town centre location which includes built form of a variety of scales and styles

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, 2019

National Planning Practice Guidance, 2019

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