

41A LONDON STREET,
READING RG1 4PS

HERITAGE STATEMENT

PREPARED BY PEGASUS GROUP
ON BEHALF OF EXP SONNET DEVELOPMENT LTD

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DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**



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ON BEHALF OF: EXP SONNET DEVELOPMENT LTD.

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1. Introduction

- 1.1 Pegasus Group have been commissioned by EXP Sonnet Development Ltd. to prepare a Heritage Statement to assess the proposed change of use and associated alterations at 41 London Street, Reading RG1 4PS as shown on the Site Location Plan provided at Plate 1.
- 1.2 The application site comprises the Grade II Listed No. 41 London Street, which currently is in office use. Internally, over the course of the 20th century, the building has been heavily altered to accommodate the changes in use, including removing internal partitions, fireplaces and changing the shopfront.
- 1.3 The application seeks both Planning Permission and Listed Building Consent for the change of use of the building to residential and the associated alterations to facilitate that use. As the building is Listed Grade II and falls within the Market Place/London Street Conservation Area, the proposals have the potential to impact upon the significance of those designated heritage assets.
- 1.4 This Heritage Statement provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 189 of the Government's

National Planning Policy Framework (the NPPF¹) which requires:

*"an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."*²

- 1.5 In order to inform an assessment of the acceptability of the scheme in relation to impacts to the historic environment, following paragraphs 193 to 197 of the NPPF, any harm to the historic environment resulting from the proposed development is also described, including impacts to significance through changes to setting.
- 1.6 As required by paragraph 189 of the NPPF, the detail and assessment in this Report is considered to be "*proportionate to the asset's importance*"³.

¹ Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, February 2019).

² MHCLG, *NPPF*, paragraph 189.

³ MHCLG, *NPPF*, paragraph 189.

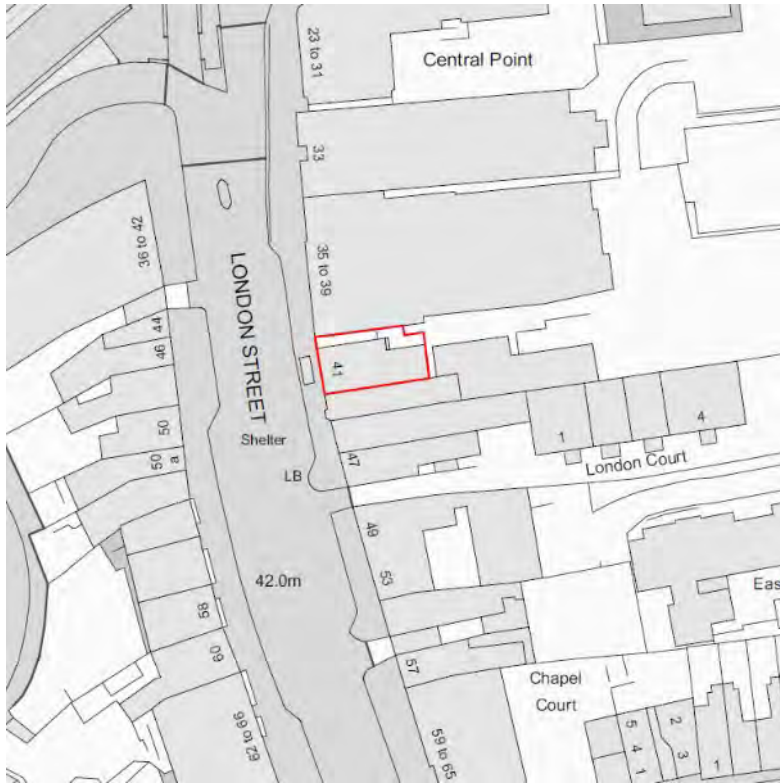


Plate 1: Site location plan.

2. Site Description and Planning History

- 2.1 The site includes the Grade II Listed 41 London Street, which is a three-storey brick built building dating from the mid-19th century. The front elevation has double doors at ground floor level with two arched windows and the levels above have three arched, sash windows each (Plate 2). The fenestration and soffit have stone mouldings and architraves. The roof is slate.
- 2.2 The rear of the building has a more utilitarian appearance and is entirely brick with majority sash windows (Plate 3). Each of the windows and the single doorway have brick arches above. The surviving chimney is visible, although this has been heavily altered internally and no longer functions as a chimney.



Plate 2: Front elevation.



Plate 3: Rear elevation.

Site Development

- 2.3 London Street was the medieval southern approach to Reading and partly retains the historic, narrow plots that were established at this time. However, much of the built form on the street has been periodically replaced.
- 2.4 Prior to the construction of the current building on the site, there was a two storey plus roof building with dormer windows and two ground floor entrances. Evidence remains on the site of the earlier built form within the passage between No. 41 and 39. The passage and the previous building on the site can be seen in an image from 1845 (Plate 4).



Plate 4: London Street, 1845.

- 2.5 By 1876, the existing building can be seen on the site, although it had a shopfront at ground floor level (Plate 5).



Plate 5: 1876 Photo.

- 2.6 The 1879 Ordnance Survey Map shows the site with the passage to the north accessing built form to the rear of the main, street-fronting buildings (Plate 6). More ancillary built form is depicted in grey on the map.



Plate 6: 1879 Ordnance Survey extract.

- 2.7 The 1931 Ordnance Survey Map did not show any significant changes within the site or immediate surrounds, apart from some further replacement of existing built form along London Street, notably to the north of the Methodist Chapel (Plate 7).



Plate 7: 1931 Ordnance Survey extract.

- 2.8 By the middle of the 20th century, the built form to the rear of the site was shown as having been altered although occupying a similar footprint to that seen previously (Plate 8).



Plate 8: 1951 Ordnance Survey extract.

- 2.9 A photo from 1969 shows the shopfront of the building still present (Plate 9). As the List Entry description does not mention a shopfront, it is likely the shopfront was replaced at some point between 1969 and 1978.



Plate 9: London Street, 1969.

- 2.10 The 1988 Ordnance Survey Map shows the significant alterations to the road layout, including the replacement of Queens Road and Mill Lane with the dual carriageway (Plate 10). This resulted in the demolition of buildings to the north of the site. The adjacent No. 39 was consolidated with Nos. 35 and 37 and a larger extension was erected, subsuming the previous extension to No. 39.



Plate 10: 1988 Ordnance Survey extract.

Planning History

- 2.11 Whilst the historic mapping described above indicates the development of the wider area, a review of the recent planning history records held online by Reading Borough Council has revealed that there are a number of planning applications which relate to the site; however, it is important to note the following:
- 2.12 **010831** | Change of use to suit office use with minor internal

alterations to layout | 29th June 2001

2.13 **010634** | Change of use to suit office accommodation. Replacement of windows and internal alterations and external repairs. | 24th May 2001

2.14 The above applications demonstrate that the building has seen internal changes to accommodate its change of use. The interior has modern finishes, including suspended ceilings, modern carpets over floorboards and modern partitions. As a result of the changes over the course of the 20th century, the interior lacks indications of the historic plan form. The plans in Appendix 1 show where there is either the potential for historic fabric, or elements representing the historic plan form/building envelope, modern fabric or a mix of the two. These were informed by a site visit.

APPENDIX 1: MORPHOLOGICAL PLANS

3. Proposed Development

3.1 The application seeks both Planning Permission and Listed Building Consent for the change of use of the building to residential and the associated alterations to facilitate that use.

3.2 The proposals are detailed on the following plans which form the application package and which this assessment considers:

- **Site Location Plan (P21-0300-SLP)**
- **Block Plan (P21-0300-BP)**
- **Elevations (P21-0300-ELEV1)**
- **Further Elevations (P21-0300-ELEV2)**
- **Existing Plans (P21-0300-EP)**
- **Existing Sections (P21-0300-ES1)**
- **Demolition Elevations (P21-0300-DEMELV)**
- **Demolition Plans (P21-0300-DEMP)**
- **Proposed Elevations (P21-0300-PE01)**
- **Further Proposed Elevations (P21-0300-PE02)**
- **Proposed Sections (P21-0300-PS)**
- **Design and Access Statement (P21-0300-DAS)**

3.3 Section 7 of this Report presents an analysis of the harm or benefits of the proposed development on the identified heritage assets discussed at Section 6.

4. Methodology

- 4.1 The aims of this Heritage Statement are to assess the significance of the Listed Building and, and to identify any harm or benefit to it which may result from the implementation of the development proposals, along with the level of any harm caused if relevant. Any potential impacts to the character and appearance of the Conservation Area will also be considered.

Sources

- 4.2 The following key sources have been consulted as part of this assessment:

- **The National Heritage List for England for information on designated heritage assets;**
- **Archival sources, including historic maps, held at various online sources; and**
- **Aerial photographs and satellite imagery.**

Assessment of significance

- 4.3 In the NPPF, heritage significance is defined as:

⁴ MHCLG, *NPPF*, p. 71.

⁵ Historic England, *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (2nd edition, Swindon, July 2015).

⁶ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”⁴

- 4.4 Historic England’s *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2*⁵ (hereafter GPA 2) gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.

- 4.5 In order to do this, GPA 2 also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage’s *Conservation Principles*.⁶ These essentially cover the heritage ‘interests’ given in the glossary of the NPPF⁷ and the online Planning Practice Guidance on the Historic Environment⁸ (hereafter ‘PPG’) which are **archaeological**,

heritage values are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

⁷ MHCLG, *NPPF*, p. 71.

⁸ Ministry of Housing Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019),

architectural and artistic and historic.

4.6 The PPG provides further information on the interests it identifies:

- **Archaeological interest:** “As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.”
- **Architectural and artistic interest:** “These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.”
- **Historic interest:** “An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.”⁹

4.7 Significance results from a combination of any, some or all of the interests described above.

4.8 The most-recently issued guidance on assessing heritage

<https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

⁹ MHCLG, PPG, paragraph 006, reference ID: 18a-006-20190723.

significance, Historic England’s *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12,¹⁰ advises using the terminology of the NPPF and PPG, and thus it is that terminology which is used in this Report.

4.9 Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Levels of significance

4.10 Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

4.11 In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 194 of the NPPF, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and

¹⁰ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 63 of the NPPF;

- **Designated heritage assets of less than the highest significance**, as identified in paragraph 194 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas); and
- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as “buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”.¹¹

4.12 Additionally, it is of course possible that sites, buildings or areas have **no heritage significance**.

Assessment of harm

4.13 Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

4.14 In order to relate to key policy, the following levels of harm may

¹¹ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

¹² *Bedford Borough Council v Secretary of State for Communities and Local Government* [2013] EWHC 2847 (Admin), para. 25.

potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”;¹² and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

4.15 With regards to these two categories, the PPG states:

“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”¹³

4.16 Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle of the spectrum and upper end of the less than substantial harm scale.

4.17 It is also possible that development proposals will cause **no harm or preserve** the significance of heritage assets. A High Court Judgement of 2014 is relevant to this. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, ‘preserving’ means doing ‘no harm’.¹⁴

4.18 Preservation does not mean no change; it specifically means no

¹³ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

¹⁴ *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin).

harm. GPA 2 states that “*Change to heritage assets is inevitable but it is only harmful when significance is damaged*”.¹⁵ Thus, change is accepted in Historic England’s guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

4.19 As part of this, setting may be a key consideration. For an evaluation of any harm to significance through changes to setting, this assessment follows the methodology given in GPA 3, described above. Again, fundamental to the methodology set out in this document is stating “what matters and why”. Of particular relevance is the checklist given on page 13 of GPA 3.

4.20 It should be noted that this key document also states that:

“Setting is not itself a heritage asset, nor a heritage designation...”¹⁶

4.21 Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage values that contribute to this significance, through changes to setting.

Benefits

4.22 Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

¹⁵ Historic England, GPA 2, p. 9.

4.23 As detailed further in Section 6, the NPPF (at Paragraphs 195 and 196) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.

4.24 Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 195 and 196.

4.25 The PPG provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*

¹⁶ Historic England, GPA 3, p. 4.

- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation."*

4.26 Any 'heritage benefits' arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the Decision Maker.

5. Planning Policy Framework

5.1 This section of the Report sets out the legislation and planning policy considerations and guidance contained within both national and local planning guidance which specifically relate to the site, with a focus on those policies relating to the protection of the historic environment.

Legislation

5.2 Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*,¹⁷ which provides statutory protection for Listed Buildings and Conservation Areas.

5.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”¹⁸

¹⁷ UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*.

¹⁸ *Planning (Listed Buildings and Conservation Areas) Act 1990*, Section 66(1).

5.4 In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”¹⁹

5.5 A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 draft of the NPPF, the requirements of which are now given in paragraph 196 of the revised NPPF, see below), this is in keeping with the requirements of the 1990 Act.²⁰

5.6 With regards to development within Conservation Areas, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability

¹⁹ *Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others* [2014] EWCA Civ 137. para. 24.

²⁰ *Jones v Mordue* [2015] EWCA Civ 1243.

of preserving or enhancing the character or appearance of that area.”

- 5.7 Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.
- 5.8 In addition to the statutory obligations set out within the Planning (Listed Buildings and Conservations Area) Act 1990, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.²¹

National Planning Policy Guidance

The National Planning Policy Framework (February 2019)

- 5.9 National policy and guidance is set out in the Government's National Planning Policy Framework (NPPF) published in February 2019. This replaced and updated the previous NPPF 2018 which in turn had amended and superseded the 2012 version. The NPPF needs to be read as a whole and is intended to promote the concept of delivering sustainable development.
- 5.10 The NPPF sets out the Government's economic, environmental and social planning policies for England. Taken together, these

policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The NPPF continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

- 5.11 The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the NPPF. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.
- 5.12 The purpose of the planning system is to contribute to the achievement of sustainable development and the NPPF sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental

²¹ UK Public General Acts, *Planning and Compulsory Purchase Act 2004*, Section 38(6).

objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the NPPF. The presumption is set out in full at paragraph 11 of the NPPF and reads as follows:

“Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- a. approving development proposals that accord with an up-to-date development plan without delay; or*
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”²²*

5.13 However, it is important to note that footnote 6 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in

²² MHCLG, NPPF, para. 11.

*footnote 63); and areas at risk of flooding or coastal change."*²³ (our emphasis)

5.14 The NPPF continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

5.15 Heritage Assets are defined in the NPPF as:

*"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."*²⁴

5.16 The NPPF goes on to define a Designated Heritage Asset as a:

*"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."*²⁵ (our emphasis)

5.17 As set out above, significance is also defined as:

"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value

*described within each site's Statement of Outstanding Universal Value forms part of its significance."*²⁶

5.18 Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 190 that:

*"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."*²⁷

5.19 Paragraph 192 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

²³ MHCLG, NPPF, para. 11, fn. 6.

²⁴ MHCLG, NPPF, p. 67.

²⁵ MHCLG, NPPF, p. 66.

²⁶ MHCLG, NPPF, p. 71.

²⁷ MHCLG, NPPF, para. 190.

- c. *the desirability of new development making a positive contribution to local character and distinctiveness.*"²⁸

5.20 With regard to the impact of proposals on the significance of a heritage asset, paragraphs 193 and 194 are relevant and read as follows:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*²⁹

"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b. *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*³⁰

5.21 Section b) of paragraph 194, which describes assets of the

²⁸ MHCLG, *NPPF*, para. 192.

²⁹ MHCLG, *NPPF*, para. 193.

highest significance, also includes footnote 63 of the *NPPF*, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

5.22 In the context of the above, it should be noted that paragraph 195 reads as follows:

"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. *the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. *the harm or loss is outweighed by the benefit of bringing the site back into use."*³¹

5.23 Paragraph 196 goes on to state:

³⁰ MHCLG, *NPPF*, para. 194.

³¹ MHCLG, *NPPF*, para. 195.

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”³²

5.24 Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

5.25 As set out later in this Report, it can be demonstrated that the proposals would serve to preserve the overall heritage significance of the identified heritage assets. Thus, Planning Permission should be granted as per the requirements of paragraph 38 which state that:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decisions-makers at every level should

seek to approve applications for sustainable development where possible.”³³

National Planning Practice Guidance

5.26 The then Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

5.27 This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

5.28 The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”³⁴

5.29 In terms of assessment of substantial harm, the PPG confirms

³² MHCLG, NPPF, para. 196.

³³ MHCLG, NPPF, para. 38.

³⁴ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm." ³⁵ (our emphasis)

Local Planning Policy

- 5.30 Planning applications within Reading are currently considered against the policy and guidance set out within the Reading Borough Local Plan 2019.

³⁵ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

- 5.31 With regards to the Historic Environment, the following policies of the Local Plan are specifically relevant to the application site:

"EN1: Protection and Enhancement of the Historic Environment

Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

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. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.

Applications which affect Listed Buildings will not have an adverse impact on those elements which

contribute to their special architectural or historic interest including, where appropriate, their settings.

Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement. The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision."

"EN3: Enhancement of Conservation Areas

The special interest, character and architecture of Conservation Areas will be conserved and enhanced. Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas. These may include:

- *Reducing visual clutter caused by negative factors, such as poles and overhead wires, satellite dishes or unnecessary street furniture;*
- *Restoring original building features;*
- *Removing inappropriate additions or alterations to buildings;*
- *Protecting and encouraging the maintenance of green spaces and important trees, particularly where they are intrinsic to the history and character of the area;*
- *Improving signage and street furniture;*
- *Restoring or re-establishing appropriate paving, railings or walls;*
- *Sympathetic landscaping and planting;*
- *Improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area;*
- *Signage that reveals and promotes the Conservation Area and its boundaries;*
- *Interpretation panels to inform the public of the area's historical significance.*

Where a Conservation Area Appraisal and Management Plan has been adopted for a particular Conservation Area, this will be a material consideration in determining applications for development."

"EN6: New Development in a Historic Context

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:

a. 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);

b. Sensitivity to historic context;

c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);

d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance."

6. The Historic Environment

- 6.1 This Section describes the elements of the historic environment which are relevant to this application, namely the Grade II Listed 41 London Street and the Market Place/London Street Conservation Area. These assets will be described, followed by an assessment of their overall heritage significance.

Statement of Significance

- 6.2 It is widely accepted (paragraph 201 of the NPPF) that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of an asset which may potentially be affected by development proposals. Significance can be derived from many elements, including the historic fabric of a building, the layout of space or land use associated with a building or area.

Grade II Listed 41 London Street

- 6.3 The building was added to the National List on 14th December 1978. The List entry describes the building as follows:

"LONDON STREET 1. 5128 (East Side) No 41 SU 7173 SE 3/524 II GV 2. Mid C19. 3 storeys quasi-Italianate. Red brick with Bath ashlar moulded impost bands, moulded cill bands with cill blocks and bracketed cornice. Slate roof with coped verges. 3 ranges of round headed windows with grey and Bath stone alternating voussoirs, raised keys; hood moulds with foliage stops. Cross glazed sash

windows. 6 panel door with radiating fanlight to right. A heavy timber frame on side elevation to this house visible in through passage to right of No 39."

- 6.4 The full List Entry can be found in Appendix 2.

APPENDIX 2: LIST ENTRY DESCRIPTION

- 6.5 The Grade II Listing of the building highlights the historic and architectural significance of the property, as does its inclusion within the boundaries of the Market Place/London Street Conservation Area.
- 6.6 The artistic and architectural interest of the building is embodied in its remaining historic physical fabric, including the external brickwork and fenestration which haven't been replaced as well as the limited surviving internal elements like chimney breasts and the staircase. Whilst the features themselves are not particularly rare, they are of high quality and represent the ongoing development and redevelopment of London Street, and are indicative of their Victorian origins and the local vernacular utilising brickwork and Bath stone. Furthermore, the survival of earlier timber framing within the passageway illustrates the previous built form on the site.
- 6.7 The historic interest of the building is embodied in it being a replacement terraced building on the site constructed in an overtly Victorian style, making the building indicative of its time.

Whilst the retail use at ground floor level and residential above has been superseded by the current office use, few elements of the building which indicate its former use, such as chimney breasts, have been retained.

6.8 Therefore, the building has both artistic and architectural and historic interests as a mid 19th century urban terraced building. Whilst alterations have taken place internally to accommodate the change in use over the years, the high quality of the external envelope can still be appreciated. The heritage significance of the Listed Building is thus principally embodied in its historic fabric, which has architectural and artistic and historic interest as a Victorian, urban, terraced building.

6.9 The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance comprise:

- **The relationship with the adjacent No. 39, with which it shares the passageway, and No. 43;**
- **The historic narrow yard and more ancillary built form to the rear representing the historic appearance of this backland areas; and**
- **The wideness of London Road.**

Market Place/London Street Conservation Area

6.10 The Market Place/London Street Conservation Area was

designated in 1972 and extended in 1982. The map of the Conservation Area can be found in Appendix 3.

APPENDIX 3: MARKET PLACE/LONDON STREET CONSERVATION AREA MAP

6.11 The map identifies Listed Buildings, important views and green spaces and Buildings of Townscape Merit. A Conservation Area Appraisal was adopted by Reading Borough Council in 2007. It summarises the special interest of the Conservation Areas as follows:

- *Linear conservation area beside the planned medieval southern approach road, over the River Kennet, to a market place and church outside one of Reading Abbey's gateways;*
- *The Hospitium of St John the Baptist, founded in 1189 (Scheduled Monument);*
- *Two of Reading's three medieval churches: St Laurence's and St Giles', both with well treed churchyards;*
- *Isolated examples of timber-framed 16th and 17th century buildings e.g. nos 26/27 Market Place, nos 49/53 London Street and nos 3/5 London Road;*
- *Good examples of prestigious Georgian town houses in London Street;*
- *The fine collection of 19th century municipal buildings in Blagrove Street including Waterhouse's distinctive Town Hall and Victoria Hall, Concert Hall and Museum, Library and Art Gallery;*

- *Groups of historic building around Market Place;*
- *Special historic and architectural focus around St Laurence's Church and the Town Hall complex;*
- *Many examples of building with bricks (red, blue and buff) from Reading's extensive local brickworks;*
- *Fine examples of 19th century banks and commercial buildings notably Barclays Bank, King Street and NatWest Bank, Market Place;*
- *Three green open spaces namely the churchyards of St Laurence's and St Giles' and the burial ground of the Friends Meeting House;*
- *Public open space (part-pedestrianised) composed of Market Place and Town Hall Square i.e. the area around the statue of Queen Victoria;*
- *Jacksons Corner, a once busy crossroads and locally known landmark;*
- *Trees in the public realm particularly street trees in London Street, Market Place and Town Hall Square;*
- *Tranquil atmosphere of Church Street;*
- *The presence of the River Kennet and a short visible length of Holy Brook;*
- *Lengths of natural stone kerb and historic paving in the courtyard of The George Hotel, Thorn Lane and alleys off London Street;*

- *Two examples of 19th century monuments: Sir John Soane's Simeon Monument and the Queen Victoria statue;*

6.12 It can thus be concluded that the significance of the Conservation Area lies in the medieval street pattern and surviving historic buildings that exhibit the close-knit urban grain of historic Reading. This also includes larger landmark buildings such as churches and municipal buildings and parks and greenery. The prevailing material is brick, which emphasises the vernacular and predominance of brick as a building material in this area over the course of a couple centuries.

6.13 As the Conservation Area covers a large area with a variety of styles and characteristics, it has been divided into several character areas. The application site falls within Area 1: *London Street*. The Appraisal states that features that make a positive contribution to the character and appearance include:

- *"The unusual width of the street, which rises gently from the River Kennet with a slight eastward curve, creates a visually interesting townscape;*
- *The high concentration of historic buildings on either side, many of which are listed;*
- *The mix of architectural styles and periods with an overall majority of late 18th/19th century buildings;*
- *High quality townscape and well-proportioned relationship between tall building and wide street;*

- *The predominance of brick with occasional use of stone and stucco;*
- *The strong vertical rhythm created by regular bays of aligned windows and doors;*
- *Key buildings: No. 33 London Street, originally the Scientific Institution, 1843, by W.Brown, and Nos 73-79 London Street, described by the architectural historian Nikolaus Pevsner as the “best” of the Georgian houses;*
- *Side alleys and streets which afford glimpses and views to east and west;*
- *Wide pavements;*
- *Ten young street trees which help to soften the otherwise urban environment;*
- *Prevalence of white-painted vertical sliding sash windows; and*
- *The variety of historic architectural detail including pedimented doorcases, iron balconies and railings, timber shopfronts.”*

6.14 The Appraisal also identifies features that contribute negatively to the character and appearance of the Conservation Area and are described as follows:

- *“Noise and fumes from a constant stream of traffic;*
- *London Street is severed from town centre by the Inner Distribution Road;*

- *Modern development at north and south extremities of London Street, adjacent to road junctions, spoils the overall historic appearance of the area;*
- *Modern alterations to the carriageway and pavement e.g. concrete paving do not always respect the quality of the street’s historic buildings;*
- *Lack of enclosure at northern end;*
- *Vacant commercial and retail space;*
- *Loss of original windows and front doors to modern replacements;*
- *Loss of original slate roofs and other architectural features such as gates and railings;*
- *Plethora of signs and other street furniture, some of which may be redundant; and*
- *Garish shopfronts that do not respect the host building e.g. no. 45 London Street.*

6.15 According to the map within the Appraisal, the application site forms part of important views up and down London Street, although it is not the focal point of the views and instead adds to the interest and variety of the historic built form within the views. Nonetheless, the building contributes positively to the views (Plate 11 and Plate 12).

6.16 Based on the above, and by virtue of the site's designation as a Listed Building, it is considered to make a positive contribution

to the character and appearance of the Conservation Area. However, there are some elements of the elevations that have been altered previously that diminish the contribution slightly, notably the alterations to the windows on the rear of the building at ground floor level.



Plate 11: The east side of London Street and the site when viewed from the north.



Plate 12: The east side of London Street and the site when viewed from further south.

7. Assessment of Harm or Benefits

- 7.1 This Section addresses the heritage planning issues that warrant consideration in the determination of the application for Planning Permission and Listed Building Consent, in line with the proposals set out in Section 3 of this Report.
- 7.2 The Planning and Compulsory Purchase Act (2004) requires that planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policy guidance set out within the NPPF is considered to be a material consideration which attracts significant weight in the decision-making process.
- 7.3 The statutory requirement set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, at Section 66 confirms that considerable weight should be given to the preservation of the historic and architectural interest of Listed Buildings and their settings. In addition, the NPPF states that the impact of development proposals should be considered against the particular significance of heritage assets such as Listed Buildings, and therefore this needs to be the primary consideration when determining the proposed application. It is also important to consider where the proposals cause harm. If

they do, then one must consider whether any such harm represents 'substantial harm' or 'less than substantial harm' to the Grade II Listed 41 London Street and the Market Place/London Street Conservation Area in the context of paragraphs 195 and 196 of the NPPF.

- 7.4 The PPG clarifies that within each category of harm ('less than substantial' or 'substantial'), the extent of the harm may vary and should be clearly articulated.³⁶
- 7.5 The guidance set out within the PPG states that substantial harm is a high test, and that it may not arise in many cases. The PPG makes it clear that it is the degree of harm to the significance of the asset rather than the scale of development which is to be assessed.³⁷ In addition, it has been clarified in both a High Court Judgement of 2013³⁸ that substantial harm would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*.
- 7.6 As set out in Section 6, the heritage assets which have the potential to be sensitive to the proposed development comprise the Grade II Listed 41 London Street and the Market

³⁶ MHCLG, Planning Practice Guidance, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019)

³⁷ Ibid

³⁸ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council

Place/London Street Conservation Area. The application seeks both Planning Permission and Listed Building Consent for the change of use of the building to residential and the associated alterations to facilitate that use.

- 7.7 Throughout the building, it is proposed to remove the existing modern partitions associated with its office use, as well as the suspending ceilings and floor finishes (Plate 13-Plate 16). As these are all modern in origins and of low quality, this strip-out will have a positive impact on the significance of the Listed Building.



Plate 13: Existing second floor finishes.



Plate 14: Existing first floor finishes.



Plate 15: Existing ground floor entrance from the hall.

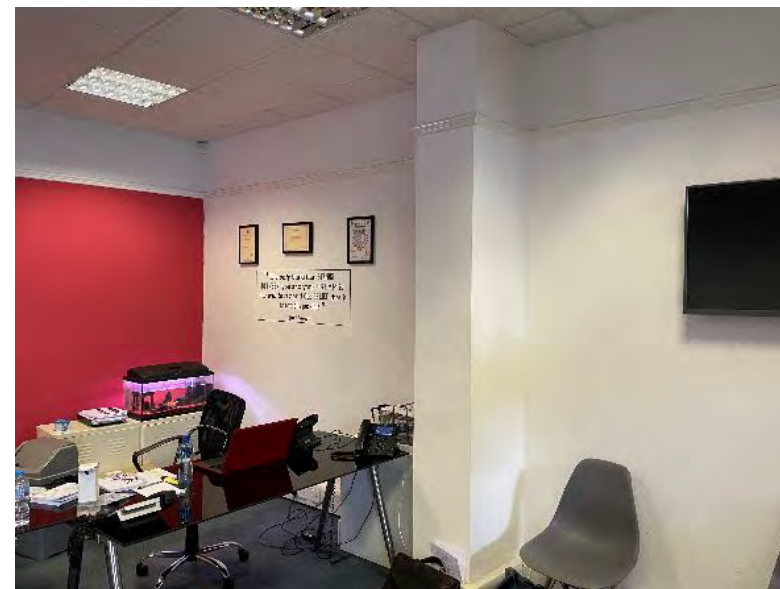


Plate 16: Existing ground floor finishes.

- 7.8 Furthermore, there will be no significant changes to the front elevation, apart from the removal of redundant cabling. The removal of this later paraphernalia will remove any potential for distraction from the historic features of the frontage, notably the Bath stone decoration complementing the red brickwork. This will have a positive impact in both Listed Building and Conservation Area terms.
- 7.9 At ground floor level, it is proposed to demolish the existing modern partitions associated with the office use, including the entry hall and plant room and w/c to the rear. It is also proposed to demolish the floor in the rear part of the main building in order to raise it, creating more head height in the basement.

Upon investigation, this floor is modern and supported by concrete joists, as seen in Plate 17. Therefore, this would result in no loss of historic fabric. Similarly, a small portion of floor will be demolished under the existing staircase in order to create stairs to the basement which is only accessible via a hatch. Again, the floor in this area is of modern origins so no historic fabric will be altered. The existing historic staircase will remain unaltered.

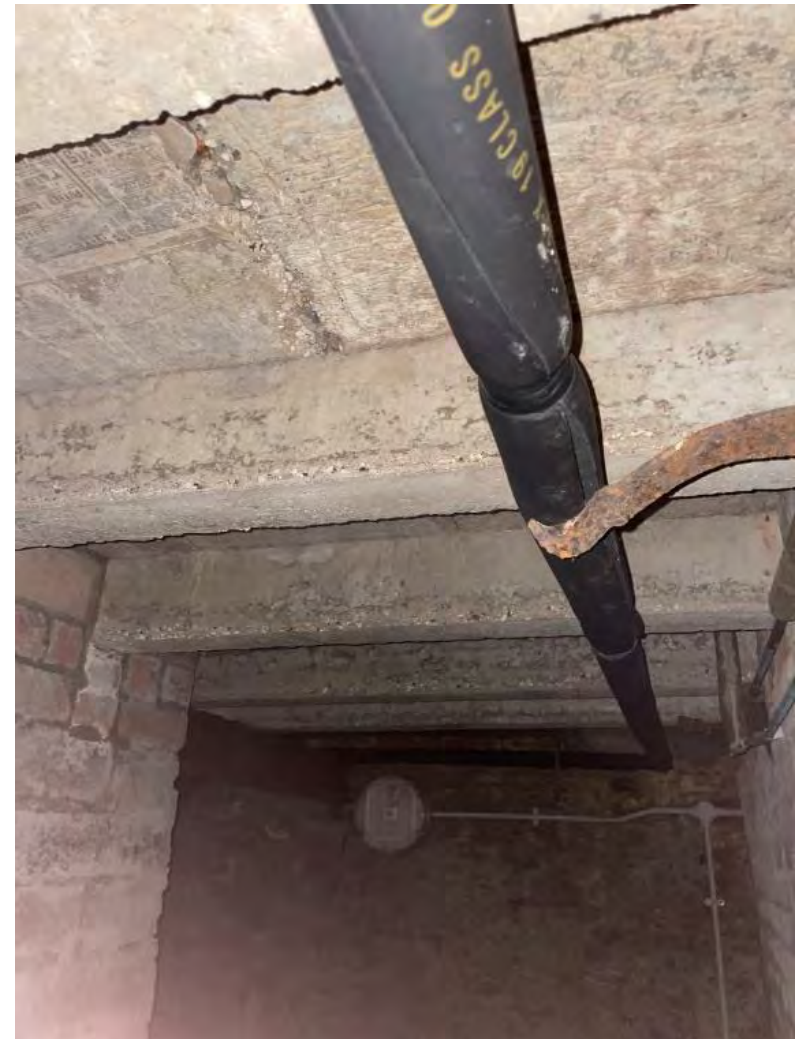


Plate 17: Modern basement ceiling/ground floor.

- 7.10 Within the ground floor, a one-bedroom flat will be created. This will include the creation of a hall from the main entrance with

the dining and living room occupying the front of the building. The bedroom and bathroom will be positioned towards the rear of the main building. The staircase will be blocked off from the unit. Whilst it is unclear if this is a historic opening from the ground floor shop unit to the staircase, there are no historic features or mouldings remaining (Plate 18).



Plate 18: Existing doorway from the front of the ground floor to the staircase.

7.11 The unit will have an additional staircase added to access the

basement level where another bedroom and shower room will be created. Images of the basement suggest that there has been considerable alteration at the level to incorporate the new ground floor above as well as blocking up existing features such as the former coal shoot. In the place of the coal shoot, it is proposed to incorporate a window within a lightwell to provide natural light to the bedroom. Thus, the proposed window and lightwell will reinstate an understanding of the presence of the basement level from the exterior whilst also limiting alteration to historic fabric (as the coal shoot has been infilled with modern brickwork and concrete lintel)(Plate 19).



Plate 19: Blocked up coal shoot at basement level.

- 7.12 Above the proposed lightwell, a taller window will be reinstated at ground floor level which will be in keeping with the

proportions of the windows above and more reflective of the importance of the ground floor level (Plate 20 and Plate 21). This will have a positive impact on both the Listed Building and the Conservation Area.



Plate 20: Modern window with infill brickwork. Historic sill remains.



Plate 21: The context of the window.

- 7.13 At the rear of the ground floor, the existing rear door will access the proposed HMO unit that will occupy part of the basement

and ground floor levels and all of the first and second floor levels. The door leaf itself will be replaced with a 6-panelled door, more in keeping with the style of the host building and more reflective of its purpose as the principal entrance to a new residential unit. The incorporation of a higher quality door in this position will have a positive impact.

7.14 As noted above, a staircase will be incorporated from ground floor to basement under the existing staircase. At basement level, a cycle store and laundry store and shower room will be incorporated. The existing chimney breast within the basement will be retained behind appropriate damp-proofing measures. The subdivision of the basement and the creation of individual rooms will have no impact upon the significance of the Listed Building given its ancillary nature and. In fact, the incorporation of rooms at this level, which is used as a store and not often accessed, will better reveal its significance as an ancillary area to the rest of the building.

7.15 Within the proposed bedroom 1 at ground floor level, the existing smaller window to the w/c will be removed and a larger window will be reinstated, as evident in the brickwork (Plate 22). A later modern window, evident by its proportions and the materiality of the lintel, will be removed (Plate 23). Both of these alterations will have a positive impact on both the Listed Building and the Conservation Area. Overall, the proposals at ground floor and basement levels will preserve the building.



Plate 22: Modern window and infill brickwork with the historic arch still visible.



Plate 23: Modern window to be removed.

- 7.16 The existing staircase will be retained and used as the principal vertical circulation for the HMO unit. At first floor level, it is again

proposed to demolish the existing modern partitions associated with the office use. New partitions are proposed to be inserted to create bedrooms, shower rooms and the kitchen and dining room at this level. The partitions have been positioned to not completely obscure any features of interest, notably the surviving chimney breasts and feature windows to London Street. Whilst a proposed partition subdivides what is currently a single large space towards the front of the building, the hierarchy of the levels will still be read and understood (Plate 24 and Plate 25). For example, the communal area of the unit is positioned at first floor level, which reflects that this level inherently has more importance than the second floor level. The kitchen/dining has also been positioned to the front of the level, occupying the 'principal space.' Whilst the partition may be appreciable from street level, this won't affect the way in which the building is read from the exterior. Therefore, the proposals at first floor level will preserve the significance of the Listed Building.



Plate 24: Single room at first floor level with the chimney breast visible.



Plate 25: The other chimney breast at first floor level and the modern partitions to either side.

- 7.17 Similarly, at second floor level, further partitions are proposed to create the ensembles, shower rooms and bedrooms. This will have a similar layout to the first floor below, thus not obscuring the chimney breasts or feature windows. The only fabric proposed to be removed is modern fabric, as shown in the morphological plans in Appendix 1. Therefore, the proposals at this level will also preserve the significance of the building .
- 7.18 Throughout the building, new finishes will also be applied and these will be of a high quality and more reflective of the quality of the host building. Whilst the existing suspended ceilings will be replaced with new ones, these will have a more consistent

height and permanent appearance, as opposed to the current ceiling tiles, and are also proposed to house the services, as existing. Glimpses into the void above the suspended ceiling have shown that there are no mouldings or features of note behind the ceiling but only modern plasterboard or structural beams (Plate 26).



Plate 26: Modern ceiling fabric and structure behind the suspended ceiling.

- 7.19 The proposals have been informed by investigations into the existing fabric and it is clear that historic fabric and features are limited to party walls and the building envelope. Overall, the proposals will provide a long-term use more akin to what would have been seen in the upper levels historically, i.e residential.

7.20 Therefore, with reference to the levels of harm in the NPPF, the proposals will result in 'no harm' to the significance of the Listed Building and Conservation Area. The statutory requirement set out in Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 will be fulfilled. The proposals will also satisfy the requirements of relevant local policies.

8. Conclusions

- 8.1 The site comprises the Grade II Listed 41 London Street, which has previously been altered to accommodate its change of use over the years, particularly with regard to the removal of the historic plan form and incorporation of modern partitions and finishes.
- 8.2 The application seeks both Planning Permission and Listed Building Consent for the change of use of the building to residential and the associated alterations to facilitate that use.
- 8.3 The heritage significance of the Listed Building is principally embodied in its historic fabric, which has architectural and artistic and historic interest as a Victorian, urban, terraced building.
- 8.4 The building is considered to make a positive contribution to the character and appearance of the Conservation Area, although this is slightly diminished by the insensitive alterations to windows on the rear of the building.
- 8.5 Ultimately, the ability to appreciate the significance of the Listed Building, which is embodied in the historic fabric and remaining historic features, such as the chimney breasts and staircase, will remain intact though the proposals, despite the changes to the plan form. The proposals will also remove low quality features and finishes and re-establish a use on the site that was more akin to what would have been seen historically.
- 8.6 Furthermore, the external alterations will have a positive impact on the character and appearance of the Conservation Area through the reinstatement of fenestration in historic positions and proportions and the removal of later, poorly designed windows.
- 8.7 Thus, with reference to the levels of harm in the NPPF, the proposals will result in 'no harm' to the significance of the Listed Building and Conservation Area. The statutory requirement set out in Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 will be fulfilled. The proposals will also satisfy relevant local policies.

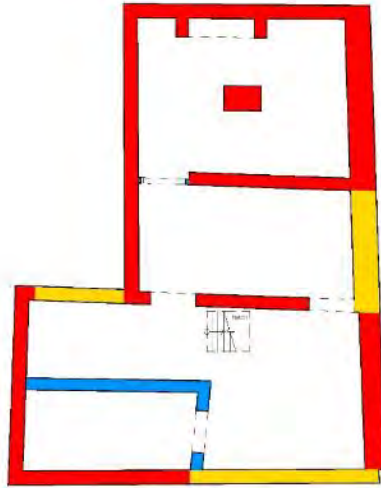
Appendix 1: Morphological Plans

KEY:

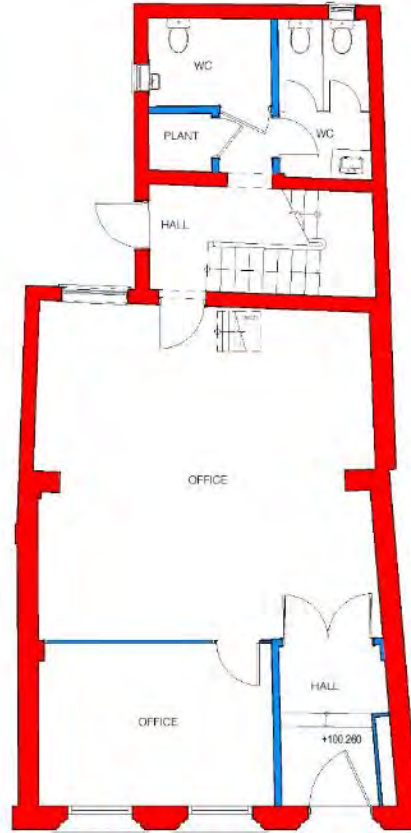
Red – Early/Original Fabric

Yellow – Mix of early fabric and historic fabric

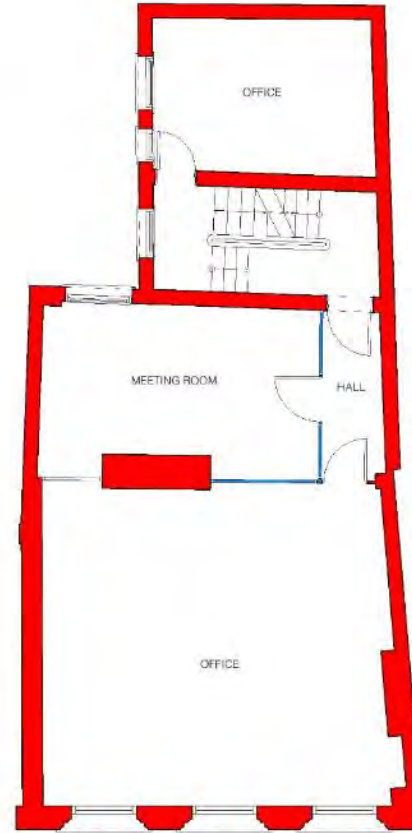
Blue – Modern fabric



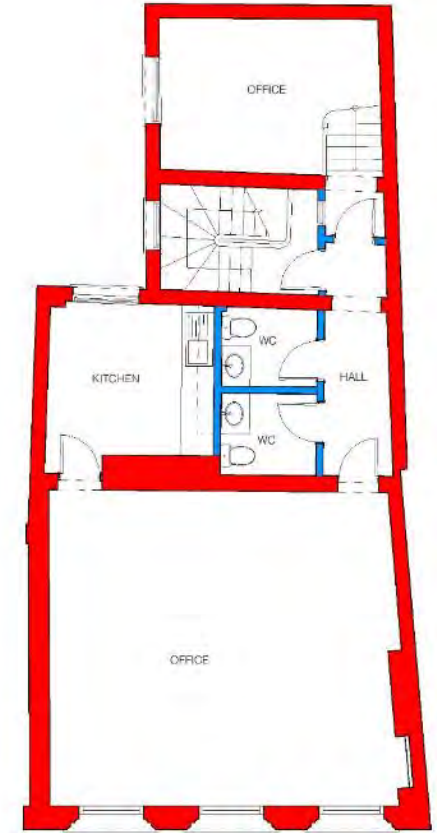
① PLAN Basement - Existing
1:50



② PLAN Ground Floor - Existing
1:50



③ PLAN Level 1 - Existing
1:50



④ PLAN Level 2 - Existing
1:50

Appendix 2: List Entry Description

Heritage Category: Listed Building

Grade: II

List Entry Number: 1113517

Date first listed: 14-Dec-1978

Statutory Address: 41, LONDON STREET

District: Reading (Unitary Authority)

National Grid Reference: SU 71799 73138

Details:

LONDON STREET 1. 5128 (East Side) No 41 SU 7173 SE 3/524 II GV 2. Mid C19. 3 storeys quasi-Italianate. Red brick with Bath ashlar moulded impost bands, moulded cill bands with cill blocks and bracketed cornice. Slate roof with coped verges. 3 ranges of round headed windows with grey and Bath stone alternating voussoirs, raised keys; hood moulds with foliage stops. Cross glazed sash windows. 6 panel door with radiating fanlight to right. A heavy timber frame on side elevation to this house visible in throughpassage to right of No 39.

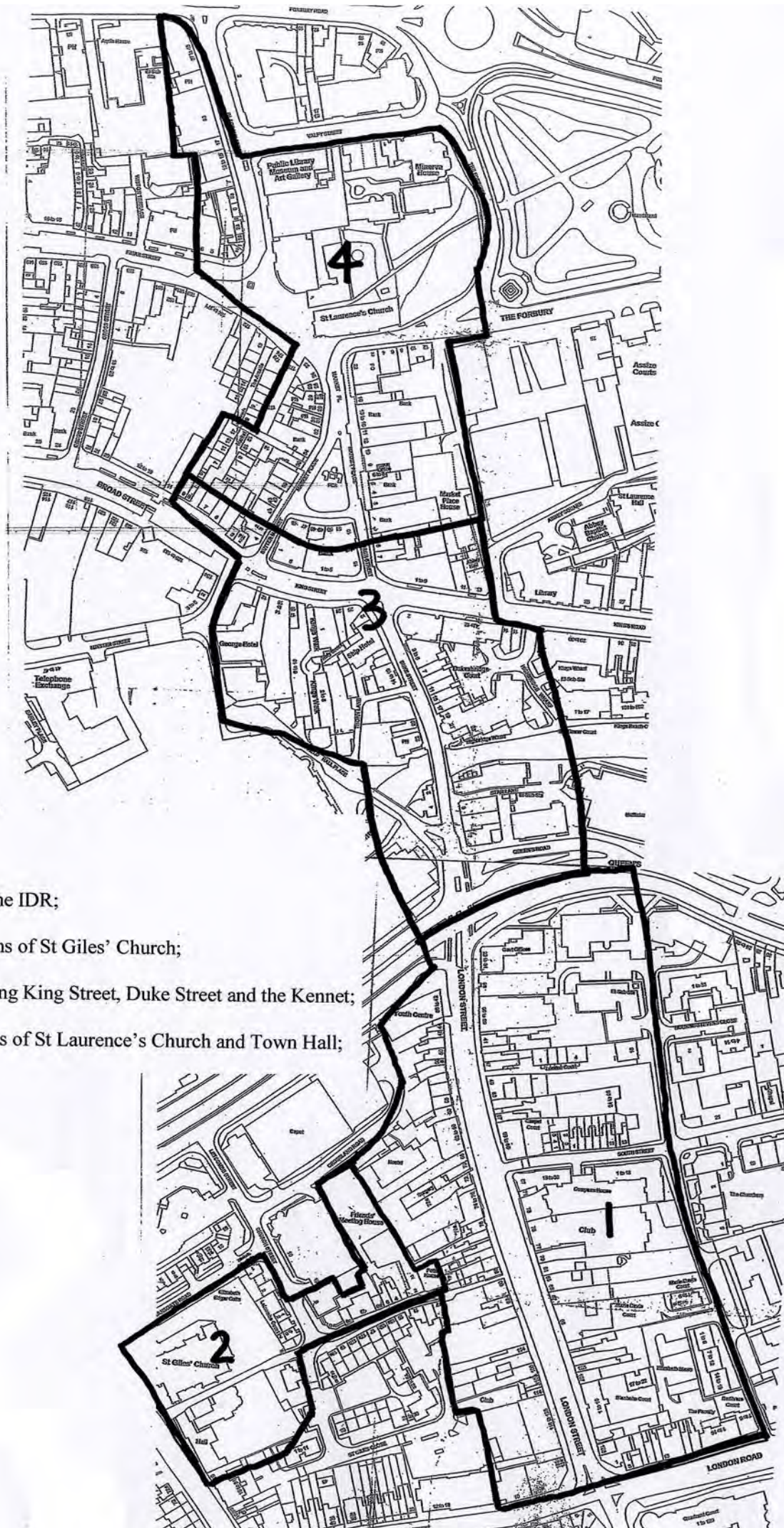
Listing NGR: SU7179973138

Legacy System number: 39029

Legacy System: LBS



Appendix 3: Market Place / London Street Conservation Area Map



CHARACTER AREAS

- 1: London Street, south of the IDR;
- 2: Church Street and environs of St Giles' Church;
- 3: Jackson's Corner including King Street, Duke Street and the Kennet;
- 4: Market Place and environs of St Laurence's Church and Town Hall;

Market Place/London Street Conservation Area

Key to townscape appraisal map

-  Conservation area boundary
-  Listed Buildings
-  Buildings of Townscape Merit
-  Important views
-  Significant trees
-  Landmark buildings
-  Significant open space
-  'Green' areas
-  Focal point
-  Water

Market Place/London Street Conservation Area
North of River Kennet

The map illustrates the layout of the conservation area, showing streets such as Valpy Street, Friar Street, Broad Street, King Street, and Queen's Road. Key landmarks include the Public Library Museum and Art Gallery, Minerva House, Laurence's Church, Market Place House, and the George Hotel. Green areas represent parks and gardens, while blue areas represent the River Kennet and water features. Blue arrows indicate the flow of traffic or pedestrian movement. The map is titled "Market Place/London Street Conservation Area North of River Kennet" and is published by The Oracle Centre.

Market Place/London Street Conservation Area
South of River Kennet

The map illustrates the layout of the conservation area, highlighting the River Kennet and the surrounding urban environment. Key features include:

- Streets:** London Street, Queen's Road, Crown Street, and the River Kennet.
- Buildings:** St. Giles' Church, Youth Centre, Cinema, and various residential and commercial buildings.
- Landmarks:** The River Kennet, a large car park, and a cinema.
- Color-Coding:** Red buildings indicate historic structures, while green buildings indicate modern or commercial structures.



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE

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