

Grade I Listed Building: St Laurence's Church



Figure 4.36: View of St Laurence's Church from Town Hall Square and also the corner of the Market Place (from above)

Summary: Architectural and Historic Interest

4.122 This Grade I listed building and local landmark is the ancient Parish Church within the heart of the historic settlement of Reading. The List Entry⁶¹ describes this building in some detail as follows:

"Church of England. Structure Norman to C15 with excessive restorations of 1867. Flint with Bath stone ashlar quoins and dressings. Taynton stone elements. Principal feature the tile C15 three stage tower closing vista to north of Market Place - crenellated parapet, octagonal chequered clasping buttresses with strings, capped by crenellation (spirelets removed); sundial to south dated 1727, main entrance to west. Tower built 1458. Tiled roofs with centre valley (nave and north aisle).

1+4 bay nave, two very wide chancel bays. Nave south wall has small Norman window at west end and a late C12 round headed doorway with waterleaf capitals; other openings restored Decorated style. Chancel east end has three lancets with blind lancets between. North aisle and chancel aisle probably 1521 (when present arcade built) see flat topped two light cusped windows and three light east window.

Interior: Norman fragments in north aisle door, king-post roof of C15. 1522. Font. Good C18 pulpit. Fine bench ends with tracery panels and poppyheads in chancel. Organ case (very fine) 1741 by Byfield. Pulpit also 1741 - panelled single storey affair on mid C19 stand. A number of brasses and memorials. The best is the memorial to John Blagrave (died 1611, author of "The Mathematical Jewell"). The principal interest of this church is that it was built at the Abbey gate. The circa 1200 work may possibly be in connection with foundation of St John's Hospice ..."

4.123 The Grade I designation denotes a building of 'exceptional' interest; relating to its particularly high importance historically and architecturally in the local and national

⁶¹ Historic England, The National Heritage List for England (website)

story. St Laurence's Church is of significance as a long-standing feature of Reading, and an important element of the town's historic core. It is of architectural interest as a place of worship which multiple phases of construction and rebuilding, as well as high-quality interior features such as the benches and pulpit. These multiple phases record the past and continuing importance of its use as a place of Christian worship. The wider historic urban townscape emphasises its role at the centre of social, cultural and religious life in Reading over several centuries.

- 4.124 St Laurence's Church was founded in the 12th century, and originally the outer gate of Reading Abbey was attached to the southern flank wall. It is constructed of flint with stone quoins and other detailing, and a red tile roof. Parts of its structure, including the quoins and a small window in the nave, are 12th century fabric, whilst much of the building dates from a phase of rebuilding in 1522. Interior features such as the pulpit and organ case date from the mid-18th century, whilst the List Entry makes reference to "*excessive restorations of 1867*". The remnants of building fabric from different phases of the church's development reflect its long history as part of Reading's religious, social and cultural life.
- 4.125 St Laurence's Church is of historic interest as one of the longest-standing buildings in Reading, and has been a prominent visual landmark in views along Friar Street, Market Place and Duke Street for all of its history. The building displays multiple phases of change and development in its physical fabric from the 12th century onwards, and is an important physical record and expression of the long use of this site as a Christian place of worship. The church therefore also derives historic interest from its possible relationship to the 12th century foundation of this institution. It also represents the last intact building related to Reading Abbey and its precinct to the east.

Setting and Contribution of Site

- 4.126 The setting of St Laurence's Church comprises the townscape area of the surrounding Market Place / London Street Conservation Area; the character and appearance of which has been described previously in this report. The church is a local landmark and overlooks the urban spaces of both Town Hall Square to the west and Market Place to the south. Conversely it is a focal point in many views from these spaces and connected streets within the local townscape and conservation area. This underlines its key importance historically as a living record of Reading's religious, social and cultural life. It forms part of an urban townscape diverse in terms of the ages, types, and architectural styles of its buildings. Whilst the individual buildings around the church have been altered and added to over time, the overall layout of the street pattern on Friar Street and Market Place remains legible as historic. There is a key associative relationship between the church and these nearby historic buildings and space, where the church would have been the primary place of worship for past residents of the area, as well as passing merchants to the town.
- 4.127 The Site building (6-8 Market Place) also falls within this conservation area designation, and so is part of the wider high varied townscape setting of this local landmark and listed building. It has been described previously that the Site building is a modern rebuilding of part of the east side of the more ancient Market Place, and it does not share any historical or architectural links to the listed church of particular or positive interest. Overall, the Site is not an element of the wider setting of this listed building that

contributes positively to the understanding or appreciation of its heritage significance, or to any shared local views.

5. Review of Application Proposals and Heritage Impacts

Introduction

- 5.1 The designated heritage assets which have the potential to be affected by the scheme proposals on Site have been properly identified and their heritage significance (and setting) described proportionately as part of this report, in **Sections 2-4**. The relevant heritage legislation, policy and guidance is also set out in full in **Appendix 3**. This includes the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF 2019 and supported by the NPPG, and relevant local policy and guidance for development within the historic environment (Reading Borough Council authority area). Together, these sections and appendices provide the appropriate context for the consideration of the heritage impacts of this now final application scheme.

Application Proposals

- 5.2 The application scheme proposals are shown in the drawings prepared and submitted by the appointed scheme architect T P Bennett and also supported by their Design and Access Statement (DAS), which also includes a number of accurate visualisations of the new scheme from locations across the Market Place and adjoining street as further illustration. This documentation should be read in conjunction with this Heritage Statement. The application proposals would comprise in description:

“Internal and external refurbishment works to existing retained office building, including alterations to building frontage on Market Place and Abbey Square. Erection of side wing and 2 storey extension to increase B1(a) office provision (totalling 10,921 sqm GEA) with associated works, including infilling at ground floor, and servicing arrangements from Abbey Square. Retention of existing ground floor retail units on Market Place”.

- 5.3 Reference should also be had to the overarching Planning Statement for the development scheme prepared by Turley South East; all as part of the full and comprehensive application submission material.
- 5.4 Importantly, this scheme has been subject to a process of pre-application engagement with the local planning authority, also including presentation of earlier iterations of the proposals to the local Design Review Panel (DRP). Feedback and discussion from this process has been used to further inform the final application submission, and the scheme design has also been refined and further detailed accordingly.

Heritage Impact Assessment

- 5.5 The application scheme is reviewed in this section with respect to their likely impact on the heritage significance of the surrounding conservation area and also the setting of nearby listed buildings. The effect of the proposed development on the significance of these heritage assets will be similar in several ways, given the way in which the

designations overlap or share similarities in their setting and / or special architectural and historic interest. Accordingly, efforts have been made to avoid repetition when describing the impacts of proposed change on the existing buildings on Site and their local townscape context. In this way we also recognise that historic, functional and or visual inter-relationships exist between these heritage assets, in particular where the conservation area provides the shared townscape setting of each of the listed buildings that contributes to their significance.

- 5.6 Change brought about by the development proposals are then considered in overall terms in light of relevant heritage legislation, planning policy and guidance for heritage assets. This context includes the relevant statutory duties of the Planning Act 1990, national policy within the NPPF 2019 and supporting NPPG, and local planning policy and guidance for development within the historic environment within the Reading Borough authority area.

Approach to Assessment

- 5.7 Historic England provides best practice advice regarding development within historic areas, within the current national legislative and planning policy framework (**Appendix 3**). This also includes advice on how to assess the impacts of change on the setting of heritage assets. As part of this, Historic England provides a useful list of factors that contribute to achieving good design and local distinctiveness for new development within the historic environment. Considerations for what could make new development successful in its context include the scale, height, massing, alignment, materials and proposed use of new built form. Such guidance has been utilised to frame the assessment of heritage impacts set out in this Section.
- 5.8 Best practice advice by Historic England also encourages a holistic approach that seeks to avoid or minimise harm to the significance of heritage asset(s); and, in tandem, also promotes opportunities for enhancements that could better reveal that significance, i.e. deliver “heritage benefits”. Ultimately, as part of any proper and proportionate planning judgement by the local planning authority, the built heritage impacts of the proposed scheme should be balanced with all the wider material planning considerations, to facilitate the delivery of sustainable development.

Proposed Development

Use

- 5.9 These application proposals would retain and adapt / expand the existing commercial building on Site to deliver additional and also a much higher quality / new concept of business and office floorspace. The existing retail unit at ground floor level would be maintained, as would its contribution to maintaining an active frontage to the Market Place. This Site is located within the town centre and so would complement the existing concentration and mix of other commercial uses in this area. This mix of uses, and also the vibrancy and vitality of the Market Place and town centre, is a positive aspect of the character of the conservation area. Therefore, in terms of use, this new scheme would further contribute to this aspect of the character of the conservation area and also its role as the setting for listed buildings nearby. This is a positive change and a “heritage benefit” that would enhance the significance of the conservation area.

Design in context

5.10 Our analysis (as set out in earlier Sections of this report) has established that the existing modern buildings on Site are a derivative example of the widespread urban commercial architecture of the postwar period, and do not indicate design of high quality, nor distinctive to this place and historic area. The Site does not make a positive contribution to the character or appearance of the surrounding conservation area, but in some ways detracts from the special qualities that define this designated heritage asset. Similarly, it does not contribute positively to the significance of nearby listed buildings as a part of their settings and this shared townscape.

5.11 During the pre-application engagement process comments were received from the Historic Buildings Consultant as a consultee response. With regard to the existing condition of the Site, this accords with our own assessment that the existing buildings do not contribute positively to the significance of the conservation area or that of any nearby listed buildings. The consultee response sets out in part that:

“The Soane Point building, which has a Tesco’s supermarket at ground floor level, is not of any architectural or historic interest and, in fact, detracts from the Market Place Conservation Area. This is partly due to the four storey, drab, brutalist concrete with degraded concrete panels exposed at first to third floor but also the front projection of the right hand section of the building, supported on blue pillars. This right hand section of the building, in particular, dominates the streetscene and the adjacent Listed Building (Nos. 1-2 Market Place) ...”

5.12 It is our assessment that these application proposals for the existing reuse, adaptation and extension of the existing non-descript modern buildings on Site represent an opportunity to deliver new architectural design and materials of a higher quality, together with a more interesting and vibrant mix of commercial uses to the square, with the potential to make a positive contribution to the character and appearance of the local townscape and surrounding conservation area. With this in mind, the supporting Design and Access Statement (DAS) prepared by the scheme architects describe in further detail the architectural brief for the revitalisation of this key town centre site, and how this has responded to the existing broader context, and both the constraints and also the opportunities presented by the Site in design terms.

5.13 One of the characteristic features of the conservation area is the rich diversity of building ages, types, styles and materials within the town centre that together represent and record the evolution of historic Reading through a long process of development and redevelopment; in response to changing uses and society, economic fortunes and building methods and architectural tastes. This is true of the key urban space of the Market Place itself; also including a number of different and distinctive historic buildings and structures alongside 20th century interventions directly addressing / enclosing it.

5.14 To the rear (eastern part) of the Site the townscape character becomes much more strongly influenced by postwar redevelopment and larger scale and more modern buildings on both sides of the service lane that follows the boundary of the conservation area, and also within the adjoining office quarter of Forbury Square and Abbey Square. The boundary of this designated area does not appear to follow the line of a historic route or part shared property boundary but that of the modern service lane, and as

existing is experienced within an area of transition between the historic square proper to the west and the more modern redevelopment of rear plots and the adjoining office quarter to the east; rather than a clear break between that old and that from the postwar period.

- 5.15 Overall, these characteristics of the local townscape and the Site's relationship with this provides an appropriate context for further change and contemporary architectural design. In terms of scale, form, massing, and elevational design and use of materials there is also a need to approach the different parts or sides of the Site in a different manner in response; whilst ensuring the consistency and integrity of the design as a whole.
- 5.16 It is recognised that the published Conservation Area Appraisal (section 6.10) also states with regard to the design of new development that: *"Many 1960s and 1970s developments pay little heed to their context and some have a notably negative effect on the character and appearance of the conservation area. More recent development within the conservation area has shown a marked improvement but design of new development remains a major issue."*

Scale, form and massing

- 5.17 The existing postwar building on Site has established the building line to the Market Place, which is defined by a forward projection beyond that historic of the southern or right hand part of the this elevation to create a colonnade at street level. The main frontage shares a strong parapet line at the height of four storeys, which aligns with that of the neighbouring modern building to the north and also the listed building Nos.13-16 within this urban block. To the south this parapet line currently rises higher then (and also projects forward of) that of the neighbouring listed building at Nos.1-2 Market Place.
- 5.18 Set back from this line the scale of the existing building increases in a series of steps or blocks into the depth of the site; rising up one full storey to the southern part and a further storey represented by a more centrally located plant / service structure. This massing is observed in existing longer views across the square and towards the varied scale, form and character of the frontages and skyline of buildings along the east side of the Market Place. Further within the depth of the Site a longer five storey block extends east to the service lane, creates an open courtyard within, and also steps down to a series of four and three storey blocks to its south side towards Abbey Square.
- 5.19 The new proposals seek to deliver additional floor space within the depth of the Site through the remodelling and rationalisation of the existing varied stepped arrangement of blocks. Importantly, the existing four storey parapet line and broken elevation of the existing building to the historic Market Place would be maintained. Set back beyond this line, the existing five storey element to the southern part would be extended north to create a more consistent line across the full width of the Site. Additional built form is also added to flank the existing central service structure at the effective fifth floor level; creating a further step and set back again from the frontage, albeit now narrower in width as it faces the square. It is deliberately further within the depth of the Site and towards the rear service lane (and conservation area boundary) that new built form would rise to its highest point (seven storeys, not including plant enclosure); as part of a narrower block positioned atop the existing rear office range. This positioning is

intended to minimise the visibility of additional built form within longer views across the square and as part of the wider skyline to the east. The existing lower eastern blocks along the secondary service lane and Abbey Square also at the rear of the Site would also be increased in height between five and six storeys.



Figure 5.1: Proposed Market Place View (T P Bennett Architects)

- 5.20 The principal frontage of the proposed reclad and remodelled building would maintain the existing four storey parapet line along this east side of Market Place, which would respect that of its immediate neighbours (including listed buildings) and also accord with that the generally prevailing (albeit not consistent) line around and enclosing the square provided by other mixed character commercial buildings. The progressive stepping back and also narrowing of the width of further storeys into the depth or rear of the Site ensures that this line remains clearly legible within local views within and across the square. Recognising the overall height and scale of the existing building would increase as a result of these proposals, this approach helps to reduce the visual impact of the uppermost storeys.
- 5.21 The use of materials and also detailed elevational / roof level design is an integral part of how new built form would be observed within local views and this part of the conservation area. This aspect is described in more detail later in this section, but overall has been applied not only to improve the external appearance of the existing modern building but also to differentiate and visually lighten the uppermost storeys as a more recessive backdrop to the square frontage and on the skyline.
- 5.22 Considering the visual effects of the new proposals and additional height and scale on Site more widely, the published Conservation Area Appraisal (appended townscape

appraisal map) helpfully graphically identifies “important views” and “landmark buildings” within and around the Market Place area. Although the scale of built development on Site would increase as a result of this scheme; and so the character and appearance of this part of the conservation area and setting of nearby listed buildings would also change, it is our assessment that the character and quality of key views and landmark features within this historic space would not be adversely affected.

- 5.23 Closest to the Site an important view is identified looking north along the High Street into the square and towards the landmark St Laurence’s Church (with the Town Hall complex behind). The set back of remodelled or additional elements to the upper storeys of the Site building would ensure that there would be little if any effect on the character or built enclosure of this narrower street view and appreciation of the taller tower and silhouette of the listed church against the sky. The other identified view within the Market Place is also orientated towards the church from the narrower northern part of this square close to this listed building. There would be no effect on the characteristics of this view as a result of the application scheme. Overall, although the character and appearance of these key views, and also a wider number of other local and longer distance views across the square, would change to a degree as a result of the proposed development, such change would not undermine the existing understanding or appreciation of the listed buildings of St Laurence’s Church, the Town Hall, the Corn Exchange Arcade Entrance, the Simeon Monument, or the curved frontage of Jacksons Corner (unlisted) into King Street in their role as prominent historic landmark features. The significance of these heritage assets would not be harmed.



Figure 5.2: Proposed Abbey Square View (T P Bennett Architects)

- 5.24 Towards the rear or eastern part of the Site the proposed remodelling of existing blocks and increase in height and scale relates appropriately to the existing scale and character of more modern and large scale buildings along the service lane and also creates a transition to the adjoining office quarter across the conservation area boundary line here. Again the use of materials and also detailed elevational design is an integral part of these proposals, and also demonstrate how not only would the external appearance be improved as experienced from within Abbey Square but also how the use of different cladding materials for each of the differentiated blocks (or parts of these blocks) adds further interest and serves to break down the apparent massing overall.
- 5.25 It is to be noted that in relation to this part of the scheme, the pre-application Historic Building Consultant response set out previously that: *"Whilst some additional height may be possible to the rear of the existing building, along Abbey Square, and the current rear car park area could be developed (D1), ..."*. It was also the view of this consultee, however, that the proposed storey heights across the Site would otherwise exceed what would be deemed to be acceptable within the conservation area.

Elevational design and materials

- 5.26 The use of materials and also detailed elevational design is an integral part of the architecture of the new scheme and also how the remodelled existing building would relate to the character and appearance of its local context within this part of the conservation area. In recognising the importance of the principal or front elevation to the historic Market Place, a key part of proposed changes is to re-clad this element with new materials of a higher quality and distinctiveness that better relate to the local palette.
- 5.27 A regular rhythm of the fenestration to the upper storeys of this elevation would be maintained, albeit given greater interest and relief through the depth of the framing elements and windows units and also combination of new materials. Importantly, the vertical proportions of these framing elements would further assist in balancing the uncharacteristically modern horizontality of the existing building frontage. The predominant facing material to this elevation and also the newly extended set back storey at fourth floor level above would be a grey brick. To the projecting southern part of the frontage a thinner red brick corbel would be introduced to as a new feature and as a further framing element to the fenestration. This is described in the elevational study in the submitted DAS as façade type 2 and type 1, respectively. This subtle differentiation in the use of materials across the frontage serves to add visual interest, in some way reflects the past more subdivided building plots along this side of the ancient Market Place, and also reflect the historic local combination of red and grey brick seen in existing buildings such as the listed Town Hall complex or the unlisted historic department store building at Jacksons Corner nearby. This scheme would also provide further improvements to the materials and elevational design of the part brick and part glazed office entrance frontage at street level.
- 5.28 Overall, these aspects of the new design would improve the external appearance of the existing modern building and how it addresses the key historic urban space of the Market Place within local views within the conservation area and context of listed buildings part enclosing it. The use of quality new materials and detailing to this frontage, which have also been chosen better relate to that of historic buildings within the local area, is a

“heritage benefit” that would enhance and better reveal the significance (character and appearance) of the conservation area.

- 5.29 As has been noted previously, at fifth floor level (and in relation to the uppermost storeys of the building) that the proposed materiality of the remodelled building deliberately changes. These upper storeys are further set back from the Market Place frontage and also step and reduce in width into the depth of the Site, and are therefore approached differently as roof level elements. The use of metal framing and glazing for cladding and also terrace balustrades serves to underline this differentiation of these upper elements from the main frontage to the square, and also would allow them to appear visually lighter as a more recessive backdrop to the frontage and on the skyline.



Figure 5.3: Proposed Market Place View (T P Bennett Architects)

- 5.30 It can be noted that in relation to this part of the scheme, the pre-application Historic Building Consultant response set out previously that: *“Whilst the proposals to re-clad the existing front elevation, along Market Place, would to some extent improve the materiality of the front elevation, this would not address the prominence of the front elevation in the streetscene, which derives partly from its height, mass and materiality, but also the large 3 storey overhang into the street ...”* It is however not within the scope of these proposals to partly or fully demolish the existing building, but to retain that existing (including the broken frontage to the square) and adapt it to provide an enhanced use and overall improvement to its appearance through high quality contemporary design and use of materials.

- 5.31 These proposals also look to improve the elevational treatment of the remodelled and extended blocks to the rear part of the Site as it addresses the service lane and Abbey Square (just outside the conservation area designation). Further façade types 3 and 4 are described in the DAS, which introduce a buff brick to the grey and also a different metal framed curtain wall. Overall the use of higher quality materials to re clad these parts of the building would improve its appearance and also raise the standard of elevational design within this secondary or more backland area to Abbey Square as seen in local views from the east. This is a further benefit of the scheme in townscape terms. In addition, the use of different cladding materials for each of the differentiated blocks (or parts of these blocks) adds further interest and also serves to break down the apparent massing of this building overall.
- 5.32 Overall, the finer detailing and new materials of the external elevations and roof elements of the proposed remodelled building are an improvement to that existing, and demonstrate high quality design and also an informed response to the local context (including the heritage assets of the conservation area and listed buildings). Different façade treatments or types are employed in a considered way, which not only reflects the different roles and conditions of the main frontage to the square, roof level and rear to the service lane, but also responds to the characteristic diversity and richness of materials and architectural styles in evidence across the conservation area. The prevailingly varied local material palette would be respected, whilst adding a further contemporary layer to this townscape that would add further interest to views.

Review of Heritage Legislation, Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.33 It is our assessment that the proposed development on Site would accord with the requirements of the relevant statutory duties of the Act. In overall terms, the new and improved use and design for this adapted and extended modern building would preserve the special interest and setting of each the nearby listed building within and around the Market Place (and along High Street), and would also preserve the character of the surrounding conservation area. Considerable importance and weight has been given to these duties as part the design development process leading to this final application scheme, which is described in this report and also in more detail in the accompanying DAS.
- 5.34 It is acknowledged however that during the pre-application engagement stage the Historic Building Consultant to the local planning authority responded that in their view the proposed storey heights of that earlier iteration of the scheme would exceed that considered to be acceptable within the conservation area and setting of listed buildings, i.e. result in harm to heritage significance. Within this context, the meaning of preservation under the relevant duties of the Act can be taken to be the avoidance of harm. However, our interpretation of case law is that any such presumption is not overriding or irrebuttable, and that there have been and again will be cases for new development where such harm would be outweighed by other material considerations powerful enough to do so. This alternative scenario is returned to again when we discuss the weighing of the overall planning balance in relation to the now further revised

application scheme in the context of national and local planning policy later in this section, and also in the accompanying overarching Planning Statement for this application.

National Policy

NPPF 2019

- 5.35 In accordance with the requirements of paragraphs 189-190 of the NPPF, the significance of the identified designated heritage assets within the Site and its local area have been described in this report in a manner proportionate to each of the assets' importance and also sufficient to understand the potential impact of the application proposals on that significance (**Sections 2-4**).
- 5.36 The full supporting material to this application submission – not only including the description of the scheme design in this report but also the package of drawings, illustrations, visualisations and DAS – demonstrate how due account has taken in developing the approach for the revitalisation of the existing building of the key principles set out in paragraph 192 of the NPPF. This paragraph encourages development proposals to consider the desirability of sustaining and also enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, which is reflected in the beneficial new use and improved elevational design and use of materials for this scheme; supporting the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality, again reflected in the contribution the optimised use of this building would make to the vitality and vibrancy of this town centre conservation area; and, also the desirability of new development making its own positive contribution to local character and distinctiveness, as reflected in the quality of the contemporary architectural approach to remodelling, new materials and detailing, and also response to the local palette and diversity of building types and styles within the townscape.
- 5.37 With regard to the likely affected designated heritage assets, which include the conservation area and also the nearby listed buildings to the east side of the Market Square, paragraph 193 sets out that great weight should be given to their conservation. Helpfully, Annex 2 of the NPPF defines the term “conservation” as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. In our view this is not intended by national policy to be a process that looks to prevent change or arrest development, particularly where new development has been shown to be well-considered and well-designed in light of its use and particular townscape context, has sought to avoid harm through the design process, and also has the potential to deliver a number of wider “public benefits”, including specific “heritage benefits”. It is our assessment that in overall terms the designated heritage assets within the study area of the Site would each be conserved, and their significance either sustained or unaffected.
- 5.38 The NPPF sets out at paragraph 194 that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Again it is our assessment that in overall terms harm would be avoided to heritage significance as a result of this proposed scheme. The further paragraphs of the NPPF in relation to heritage harm (195-196 and 201) also would not therefore apply.

- 5.39 This was not the view of the Historic Building Consultant to the local planning authority however at pre-application stage. With regard to that earlier iteration of the scheme, it was set out in their consultee response that in planning policy terms harm would occur to the significance of the Market Place and London Road Conservation Area (and also assumed to that of the named listed buildings nearby: Nos.1-2 and Nos.13-16 Market Place) principally as a result of the additional height and mass proposed at the higher level of the Site building and as would be seen in views from within the Market Place. Although it is not explicitly stated in the consultee response we have seen that the level of harm would be considered to be “less than substantial” for the purposes of the NPPF, this has been assumed due to the repeated reference to paragraphs 193 and 196 within the review of national policy, and also no reference to paragraphs 194 or 195 that relate to ‘substantial’ harm. It is noted however that reference is made in this response to the previous version of the NPPF dated 2018 rather than the most recent update from February 2019 (with its different paragraph numbering).
- 5.40 Reference should be made at this point to the DAS, which provides further description of the design process and also how the scheme has now been further refined for application submission in the context of such past feedback from officers and also the Design Review Panel (DRP) as part of pre-application discussions. The new application scheme and revised design is that which should be assessed accordingly.
- 5.41 It is our view that should the local planning authority at application stage possibly identify and allege a degree of harm to the significance of one or more of the identified designated heritage assets as a result of this aspect of the now final scheme, such heritage harm could only reasonably be minor in magnitude in the context of the defining character and appearance of the conservation area as a whole, and also this shared townscape setting and views of nearby listed buildings. Such alleged minor harm would fall within the NPPF definition of “less than substantial” and also at the very lower end of this scale or spectrum⁶².
- 5.42 Paragraph 196 of the NPPF concerns proposals which could lead to “less than substantial” harm to heritage significance. This states that under these circumstances any such harm should be weighed against the “public benefits” presented by the application proposals as a whole⁶³. Accordingly, the “public benefits” that would flow from the proposed new use and redevelopment of the existing building on Site are described in the application Planning Statement through its overarching discussion of all the relevant planning considerations. Looking to the wider planning balance in this case, it is one of the key conclusions of the Planning Statement that any alleged minor harm to the significance of designated heritage asset(s) would be decisively outweighed by the public benefits that this scheme would deliver overall, in the terms of the NPPF when read as a whole (and also in light of the overarching statutory duties of the Act).
- 5.43 NPPG defines that public benefits can also include “heritage benefits”, which are changes that would enhance or better reveal the significance of heritage assets. As previously described in this Section with regard to use, the additional and also a much higher quality / new concept of business floorspace on Site would contribute positively to the characteristic mix of uses, vibrancy and vitality of the Market Place and town

⁶² NPPG, Paragraph: 017 Reference ID: 18a-017-20140306

⁶³ NPPG, Paragraph: 020 Reference ID: 18a-020-20140306

centre conservation area; as a “heritage benefit”. In addition, the new elevational design, improved proportions, and use of high quality (and also locally referenced) materials and detailing for the existing remodelled building would improve its external appearance within local views. This is another specific “heritage benefit” that would in this way enhance the character and appearance of the conservation area and also the shared setting of nearby listed buildings.

- 5.44 The identification and delivery of heritage benefits responds to paragraph 200 of the NPPF that encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of other heritage assets to enhance or better reveal their significance.

Development Plan

Local Plan 2019

- 5.45 It is our assessment (as previously described in this Section of the report) that overall the application scheme would be in accordance with the requirements of local Policy EN1, which expect such proposals to protect, and where possible enhance, the significance of heritage assets and their settings. Also to comply with these policy requirements this Heritage Statement report has been prepared to describe the built heritage impacts and also to support this application submission.
- 5.46 Overall these proposals would also accord with the requirements of Policy EN3, which states that the character and architecture of conservation areas should be conserved and enhanced. The high quality new building design and its materials, and also the revitalised use of the Site, would make a positive contribution to local character and distinctiveness. As required, the published Conservation Area Appraisal and its associated guidance has been reviewed as part of our assessment of heritage significance and impacts.
- 5.47 With regard to Policy EN6, this report, and DAS and also other supporting material to this application submission demonstrates how study of the historic environment has informed and shaped the proposed development on Site. The new use and design would make a positive contribution to the historic character and architectural and visual qualities of the local area. As has been previously described, the relevant criteria or factors of this policy have been duly considered through the proposed design; in relation to the scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open spaces of the townscape context (a), and also by reflecting Borough-wide heritage themes such as the combination of local grey and red brickwork.
- 5.48 With regard to the specific allocation of this Site for development within the Local Plan, the relevant development principles have been duly considered through the design process for this application scheme (Policy CR14e). The proposed new and optimised use of the existing remodelled building would contribute positively to the characteristic mix of uses, vibrancy and vitality of the Market Place and surrounding conservation area. The existing building line to the square would be retained, and the new elevational design and use of high quality (and also locally referenced) materials and detailing would improve its external appearance within local views within the conservation area and also this shared townscape setting of nearby listed buildings. Although the overall height and scale of existing building would increase, the well-considered positioning, form and

massing of the upper levels, and also the appropriate use of quality facing materials, would ensure that these proposals would reflect any general prevailing height of the varied buildings that address and enclose the Market Place.

6. Summary and Conclusions

- 6.1 This Heritage Statement has been prepared by Turley Heritage on behalf of the Applicant, to provide relevant and proportionate information to the local planning authority with regard to likely built heritage impacts, and in support of an application for Planning Permission for the proposed development of the new use, revitalisation and remodelling / redesign of the existing modern building on the Site of Nos.6-8 Market Place. This Site is located within the Market Place / London Street Conservation Area and also within the proximity of a number of statutory listed buildings.
- 6.2 The requirement for this report stems from Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which places a duty upon the local planning authority in determining applications for development affecting listed buildings to pay special regard to the desirability of preserving the building or their settings. Under Section 72, the Act also requires that special attention be given to preserving or enhancing the character or appearance of a conservation area with regard to development in that area.
- 6.3 To comply with these statutory duties and also national planning policy, as set out in the NPPF 2019 (paragraphs 189-190), the designated heritage assets that have the potential to be affected by these development proposals have been identified and their significance described proportionately as part of this report (**Sections 2-4**). This is our built heritage baseline upon which to assess the impacts of proposed change.
- 6.4 **Section 5** provides a review of the application scheme design and its likely impact on the significance of the identified designated heritage assets of the conservation area and also nearby listed buildings that comprise part of the townscape of this designated area. This assessment is undertaken in light of our established heritage baseline and also in overall terms in light of the relevant statutory duties, national and local planning policy and guidance for change in the historic environment.
- 6.5 As found today, the existing modern buildings on Site are a derivative example of the widespread urban commercial architecture of the postwar period, and do not indicate design of high quality, nor distinctive to this place and historic area. The Site does not therefore make a positive contribution to the character or appearance of the surrounding conservation area, or to the significance of nearby listed buildings as a part of their shared setting and local views. In this context, it is our assessment that the proposed redevelopment of this building represents an opportunity to deliver new architectural design and materials of a higher quality, together with a more interesting and vibrant mix of commercial uses, that would instead contribute positively to the character of the historic Market Place.
- 6.6 It is our assessment of the scheme that in overall terms the designated heritage assets within the study area of the Site would each be conserved, and their significance either sustained or unaffected. We have also identified that aspects of these new proposals have the potential to deliver “heritage benefits” that would enhance or better reveal the significance of heritage assets. With regard to use, the additional and also a much higher quality / new concept of business floorspace on Site would contribute positively to the characteristic mix of uses, vibrancy and vitality of the Market Place and town centre

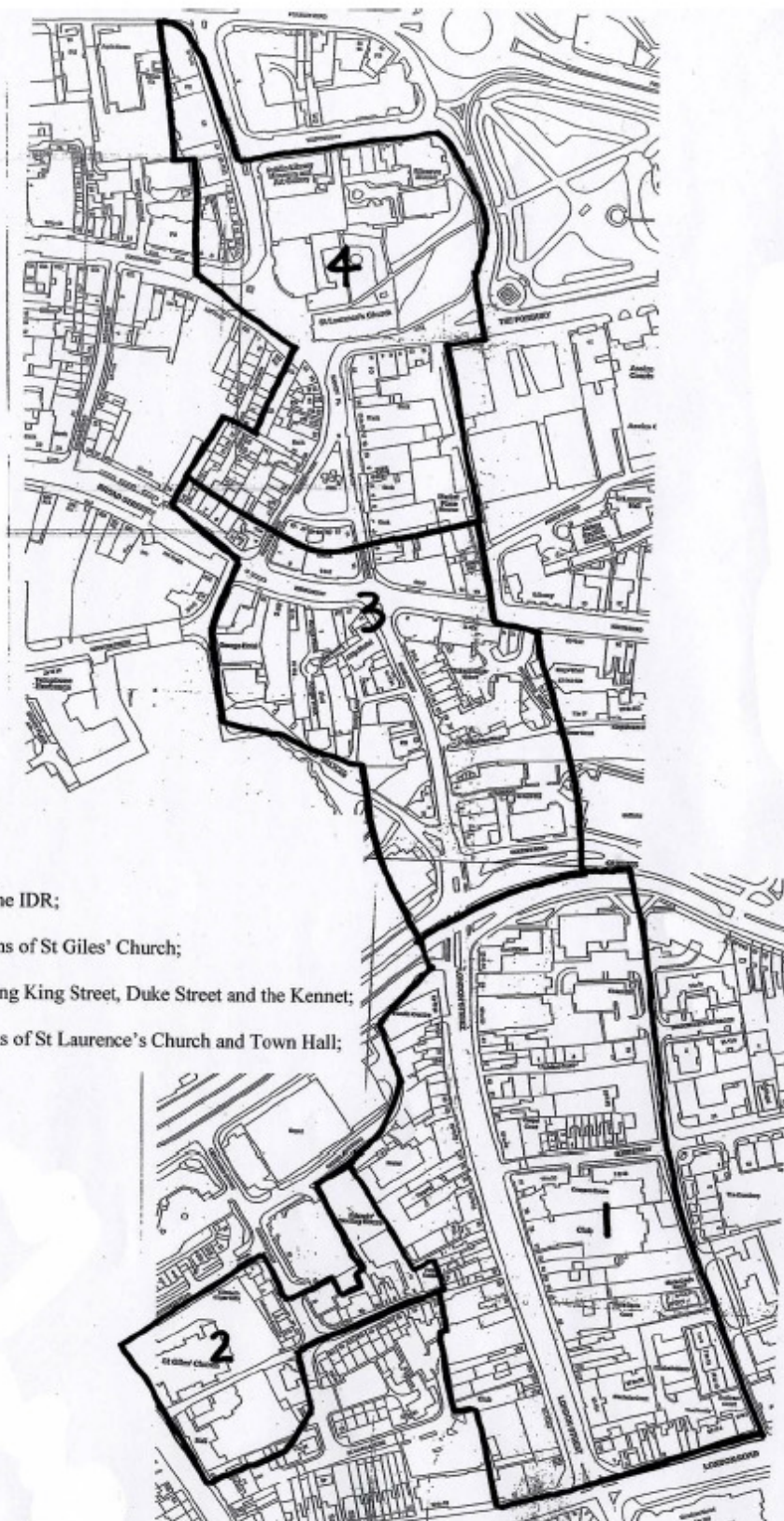
conservation area. In addition, the new elevational design, improved proportions and use of high quality (and also locally referenced) materials and detailing for the existing remodelled building would improve its external appearance within local views.

- 6.7 In conclusion, these application proposals would in overall terms be in accordance with the principles of the relevant statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990 with regard to conservation areas and listed buildings, national policy set out in the NPPF 2019 (paragraphs 189-190, 192-194, 196 and 200-201) and supported by NPPG, and local policy and guidance, including the Reading Borough Local Plan 2019.

Appendix 1: Conservation Area Boundary Map

Market Place / London Street Conservation Area

Including, conservation area townscape appraisal map for character area 1



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;

Appendix 2: List Entries

Nos.1-2 Market Place (Grade II listed building)

<https://historicengland.org.uk/listing/the-list/list-entry/1156257>

Nos.13-16 Market Place (Grade II listed building)

<https://historicengland.org.uk/listing/the-list/list-entry/1113535>

Nos.7 & 8 High Street (Grade II listed buildings)

<https://historicengland.org.uk/listing/the-list/list-entry/1155910>

<https://historicengland.org.uk/listing/the-list/list-entry/1155910>

The Obelisk, Market Place (Grade II* listed building)

<https://historicengland.org.uk/listing/the-list/list-entry/1113534>

Nos.48-52 Market Place & 10 High Street (Grade II listed buildings)

<https://historicengland.org.uk/listing/the-list/list-entry/1156281>

<https://historicengland.org.uk/listing/the-list/list-entry/1113540>

<https://historicengland.org.uk/listing/the-list/list-entry/1113494>

Nos.3-5 King Street (Grade II listed building)

<https://historicengland.org.uk/listing/the-list/list-entry/1113497>

Nos.23-34 Market Place & Corn Exchange Arcade Entrance (Grade II listed buildings)

<https://historicengland.org.uk/listing/the-list/list-entry/1113536>

<https://historicengland.org.uk/listing/the-list/list-entry/1302967>

<https://historicengland.org.uk/listing/the-list/list-entry/1113537>

<https://historicengland.org.uk/listing/the-list/list-entry/1156271>

<https://historicengland.org.uk/listing/the-list/list-entry/1113538>

<https://historicengland.org.uk/listing/the-list/list-entry/1113539>

Church of St Laurence (Grade I listed building)

<https://historicengland.org.uk/listing/the-list/list-entry/1113532>

Appendix 3: Heritage Legislation, Policy and Guidance

Statutory Duties

The Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66 imposes a general duty as respects listed buildings in the exercise of planning functions. Subsection (1) provides

‘In considering whether to grant planning permission 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.’

With regard to applications for planning permission within conservation areas, it is set out in Section 72(1) that

‘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 of preserving or enhancing the character or appearance of that area.’

Recent case law⁶⁴ has confirmed that Parliament’s intention in enacting section 66(1) of the 1990 Act was that decision-makers should give ‘considerable importance and weight’ to the desirability of preserving the setting of listed buildings, where ‘preserve’ means to ‘to do no harm’. This duty must be borne in mind when considering any harm that may accrue and the balancing of such harm against public benefits as required by national planning policy. Case law has confirmed that this weight can also be applied to the statutory tests in respect of conservation areas.⁶⁵ The Secretary of State has confirmed⁶⁶ that ‘considerable importance and weight’ is not synonymous with ‘overriding importance and weight’.

Importantly, the meaning of preservation in this context, and for both listed buildings and conservation areas, as informed by case law, is taken to be the avoidance of harm.

It has been demonstrated that section 72 requires attention to be directed to the effect on the conservation area as a whole rather than on particular parts of it.⁶⁷

⁶⁴ Barnwell Manor Wind Energy Limited and (1) East Northamptonshire District Council (2) English Heritage (3) National Trust (4) The Secretary of State for Communities and Local Governments, Case No: C1/2013/0843, 18th February 2014.

⁶⁵ The Forge Field Society v Sevenoaks District Council [2014] EWHC 1895 (Admin); North Norfolk District Council v Secretary of State for Communities and Local Government [2014] EWHC 279 (Admin).

⁶⁶ Appeal by Crudance Strategic Ltd: Land at Razor’s Farm, Chineham, Basingstoke (ref. APP/H1705/A/13/2205929), 2014.

⁶⁷ South Oxfordshire DC v SSE & J Donaldson [1991] CO/1440/89.

National Policy

National Planning Policy Framework (NPPF) 2019

The National Planning Policy Framework (NPPF) was introduced in March 2012 as the full statement of Government planning policies covering all aspects of the planning process. This document was revised and re-published by the Ministry of Housing, Communities and Local Government in February 2019.

The glossary of the NPPF (Annex 2) defines conservation as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Chapter 16 of the NPPF outlines the Government's guidance regarding conserving and enhancing the historic environment in more detail.

Paragraph 189 requires the significance of the heritage assets, which may be affected by the proposals to be described as part of any submission, ideally as part of a Heritage Statement report. The level of detail should be proportionate to the importance of the assets and sufficient to understand the potential impact of the proposals on their significance.

Paragraph 190 sets out that local planning authorities should also identify and assess the particular significance of heritage assets that may be affected by proposals. They should take this assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 192 states that local planning authorities should take account of the desirability of sustaining and enhancing the significance of all heritage assets and putting them into viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 states that when considering the impact of a proposed development on the significance of a designated heritage asset, such as a conservation area or listed building, 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.

Under paragraph 194 it is also set out that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.

Paragraph 195 outlines that local planning authorities should refuse consent where a proposal will lead to substantial harm or total loss of significance, unless it can be demonstrated that this is necessary to deliver substantial public benefits that outweigh such harm or loss, or a number of other tests can be satisfied.

Paragraph 196 concerns proposals which will lead to less than substantial harm to the significance of a designated heritage asset. Here harm should be weighed against the public benefits, including securing the optimum viable use, where appropriate.

Paragraph 200 encourages local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets, such as listed buildings, to enhance or better reveal their significance. It also states that proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

Paragraph 201 establishes that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the conservation area should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the area as a whole.

The Development Plan

Reading Borough Council Local Plan 2019

The Local Plan for Reading is the document that contains the policies for how Reading will develop up to 2036, which is the end date of the plan. It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided. The Local Plan was adopted in November 2019.

The Local Plan replaces all existing development plans in Reading, including the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015).

Policy EN1 (Protection and enhancement of the historic environment) sets out that:

“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."

Policy EN3 (enhancement of conservation areas) states that:

"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."

Policy EN4 (locally important heritage assets) states 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.

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. 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. 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."

Policy EN6 (new development in an historic context) sets out 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:

- 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.”*

With regard to Central Reading and its area-specific policies, the historic environment is identified as part of the context to its planned future growth. Area Policy CR2 (Design in Central Reading) sets out more broadly that:

“Applications for development within Central Reading should demonstrate the following attributes:

- a. Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;*
- b. Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscaped areas, and public art, that provide suitable*

functions and interest, sense of place and safe and convenient linkages to adjoining areas;

c. Development should consider and, where possible, include ways of providing green infrastructure designed into the development, for instance through roof gardens, green walls and green roofs, to enhance the otherwise very urban environment;

d. The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;

e. Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety; and

f. Development should be designed with consideration of adjacent development sites, and should not prevent or cause unreasonable burdens on the future development of those sites.”

The application Site (6-8 Market Place) is part of a larger allocated site that falls within the category of “Other Sites for Development in Central Reading” (Policy CR14). Development principles for this site are set out as:

“CR14e 3-10 MARKET PLACE, ABBEY HALL AND ABBEY SQUARE

Development for retail and related uses on ground floor with residential and/or offices on upper floors, designed to enhance contribution of site to Conservation Area. Possible pedestrian link between Market Place and Forbury Square/Abbey Square. Rear servicing and preservation of historic building line.

Development should:

Enhance the Conservation Area and the setting of adjacent listed buildings;

Reflect the prevailing height of Market Place;

Take account of the high potential for archaeological significance;

Address noise impacts on residential use; and

Address air quality impacts on residential use.

Site size: 0.29 ha 46-70 dwellings plus ground floor town centre uses”

Supplementary Planning Documents / Guidance

The following supplementary planning documents or guidance to the Local Plan are also relevant to the consideration of this scheme and its impacts on heritage significance:

Reading Borough Council: Market Place / London Street Conservation Area Appraisal 2007

Reading Borough Council: City Centre Framework 2008

Other Guidance and Material Considerations

National Planning Practice Guidance (NPPG)

National Planning Practice Guidance was first issued by the Government in 2014 as a living web resource, including a category on conserving and enhancing the historic environment. This is intended to provide more detailed guidance and information with regard to the implementation of national policy set out in the NPPF, and has been updated most recently in 2019 to reflect policy and case law changes.

Department of Culture, Media and Sport Circular: Principles of Selection for Listing Buildings 2018

The Principles of Selection for listing buildings sets out the general criteria for assessing the special interest of a building in paragraph 16, as below:

“Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;

Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.”

When making a listing decision, paragraph 17 sets out that the Secretary of State may also take into account:

“Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.”

General principles for selection are also set out in this advice, in paragraphs 18-23. These include: Age and rarity; Buildings less than 30 years old; Aesthetic merits; Selectivity; and National interest, although State of repair will not usually be a relevant consideration.

In addition to the criteria and general principles set out in the guidance, a number of Selection Guides for different building types have been published by Historic England, first in 2011 and then later updated. These Selection Guides provide further information regarding each building type, and demonstrate what features are considered significant and likely to make a building of special architectural or historic interest when assessing each building type.

Equivalent Selection Guides for registered parks and gardens of historic interest have also been published by Historic England regarding each landscape type.

Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment 2015

This document provides advice on the implementation of historic environment policy in the Framework and the related guidance given in the PPG. For the purposes of this report, the advice includes: assessing the significance of heritage assets; using appropriate expertise; and also historic environment records.

It provides a suggested staged approach to decision-making where there may be a potential impact on the historic environment:

- “1. Understand the significance of the affected assets;*
- 2. Understand the impact of the proposal on that significance;*
- 3. Avoid, minimise and mitigate impact in a way that meets the objectives of the Framework;*
- 4. Look for opportunities to better reveal or enhance significance;*
- 5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;*
- 6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.”*

With particular regard to design and local distinctiveness, advice sets out that both the NPPF (section 7) and NPPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place*
- *The relationship of the proposal to its specific site*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the*

landscape, the grain of the surroundings, which includes, for example the street pattern and plot size

- *The size and density of the proposal related to that of the existing and neighbouring uses*
- *Landmarks and other built or landscape features which are key to a sense of place*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces*
- *The topography*
- *Views into, through and from the site and its surroundings*
- *Landscape design*
- *The current and historic uses in the area and the urban grain*
- *The quality of the materials*

Historic England: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets 2017 (2nd Edition)

GPA Note 3 provides information to assist in implementing historic environment policy with regard to the managing change within the setting of heritage assets, and also now views analysis. This also provides a toolkit for assessing the implications of development proposals affecting setting and views. A series of stages are recommended for assessment, these are:

- *Step 1: identifying the heritage assets affected and their settings*
- *Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)*
- *Step 3: assessing the effect of the proposed development*
- *Step 4: maximising enhancement and minimising harm*
- *Step 5: making and documenting the decision and monitoring outcomes.*

Historic England: Advice Note 1: Conservation Area Designation, Appraisal and Management 2019 (2nd Edition)

This Historic England Advice Note supports the NPPF and NPPG, and is intended to set out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management. It seeks to offer advice to all those involved in managing conservation areas so that the potential of historic areas worthy of protection is fully realised, the need for community and owner consultation examined, and the benefits of management plans to manage change, and achieve regeneration and enhancement, fully exploited. Advice on appraisal of conservation areas is also given, as assistance in demonstrating special interest and articulating character, guiding investment, and in developing a management plan.

Historic England: Advice Note 2: Making Changes to Heritage Assets 2016

This advice note provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone. This covers different types of heritage assets, including buildings and other structures; standing remains including earthworks; buried remains and marine sites; as well as larger heritage assets including conservation areas, registered landscapes, and World Heritage Sites.

Historic England: Advice Note 12: Statements of Heritage Significance 2019

This Historic England Advice Note provides general advice with regard to preparing statements of heritage significance and also the analysing of significance for the full range of heritage assets. This is designed primarily for applicants proposing changes to heritage assets, and accords with the Framework as revised.

English Heritage (now Historic England): Conservation Principles: Policies and Guidance 2008

This guidance document sets out Historic England's approach to making decisions and offering guidance about all aspects of England's historic environment. The contribution of elements of a heritage asset or within its setting to its significance may be assessed in terms of its "heritage values":

"Evidential Value: the potential of a place to yield evidence about past human activity.

Historical Value: the ways in which past people, events and aspects of life can be connected through a place to the present.

Aesthetic Value: the ways in which people draw sensory and intellectual stimulation from a place.

Communal Value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.' (Paras. 30-60)"

A draft has been released for public consultation and subsequent revision of this document in 2018.

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