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HERITAGE STATEMENT

In respect of

39 Brunswick Hill, Reading, RG1 7YU

On behalf of

Eric Benjamin

AHC REF: PM/9664

Date: February 2019

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1.0 INTRODUCTION

- 1.1 This report has been prepared and written by Patrick Christopher Maguire, Associate Director at Asset Heritage Consulting Ltd. ('AHC'), on behalf of Mr Eric Benjamin to provide an assessment of the built heritage issues affecting the proposed redevelopment of 39 Brunswick Hill, Reading.
- 1.2 An application was submitted to Reading Borough Council for the redevelopment of 39 Brunswick Hill in October 2017 (ref.171719). This was refused planning permission on 15 March 2018.
- 1.3 Officers did not object to the principle of the loss of the existing building on the site but were of the opinion that design of the proposed replacement would, *'respond insensitively to the immediate streetscene and pattern of development'* and for this reason would, *'not respond positively to the local context or maintain or enhance the local character and appearance of this part of Reading, nor sufficiently justify the loss of the existing building (a non-designated Heritage Asset)'*.
- 1.4 A planning appeal was submitted for this scheme in April 2018 (PINS ref.APP/E0345/W/18/3200081). The appeal was dismissed in November 2018 and, in his Appeal Decision, the Inspector agreed with Council officers that the existing building on the site was of sufficient heritage interest to be considered a 'non-designated heritage asset' as defined by the NPPF and its accompanying PPG.
- 1.5 In this regard, he shared the opinion of Council officers that the proposed replacement building would, *'harm the architectural character of the area and appear at odds with its pattern of development'* and would be, *'incomparable to the architectural quality and heritage interest of the existing building on the site, whose loss this proposal would not mitigate'*.
- 1.6 Responding positively to this advice, the applicant has thoroughly revised the design approach to the proposed replacement building, responding more sensitively to the pattern of the surrounding development.

- 1.7 Indeed, it is my considered opinion that this revised scheme represents a substantial improvement on the scheme considered under application 171719 and appeal APP/E0345/W/18/3200081.
- 1.8 Although it is accepted that a degree of heritage 'harm' will result from the loss of the existing building, the applicant and their professional team are now firmly of the opinion that, when considering the 'balanced view' required under paragraph 197 of the NPPF, the revised replacement building will mitigate this loss to a good degree through its sensitive design and this should be considered alongside the resultant public benefits, including the provision of additional housing units.

2.0 THE HERITAGE ISSUES

- 2.1 The purpose of this section of the report is to consider the effects of the application proposals in built heritage terms. A full description of the historical development and current form of the site, alongside an assessment of its heritage significance, is set out in Asset Heritage's April 2018 Heritage Assessment, submitted alongside appeal APP/E0345/W/18/3200081, and does not require restatement here.
- 2.2 That assessment should also be considered alongside the assessments set out in the officers' report for application 171719 and the Inspector's decision for appeal APP/E0345/W/18/3200081.
- 2.3 In those assessments, both officers and the Inspector considered the existing building to meet the necessary criteria to be considered a 'non-designated heritage asset', although it was not found to be of sufficient heritage significance for inclusion on Reading Borough Council's local list.
- 2.4 It should, however, be emphasised that there are no statutory heritage designations affecting this site, which does not contain any listed buildings and is not located in a conservation area. The nearest conservation area is the Downshire Square Conservation Area, the setting of which is considered in the text below.
- 2.5 As noted in the officers' report for application 171719, the heritage issues in this case essentially consist of two broad aspects: the loss of the existing building; and the quality/suitability of the proposed replacement.

The demolition of the existing building

- 2.6 In their consideration of application 171719, Council officers were of the opinion that the existing building did not meet the criteria for inclusion on the Council's local list but that it was of sufficient interest to be considered a 'non-designated heritage asset' as defined by the NPPF and PPG, i.e. a material consideration in the planning process.

- 2.7 In the context of that evaluation, officers were of the firm opinion that, *'providing that the proposal is compliant with other adopted planning policies, there would be no in principle objection to a residential redevelopment of the site, involving the loss of the existing property'* (paragraph 6.8 of the Committee Report for application 171719).
- 2.8 The Inspector agreed with officers that the existing building should be considered as a 'non-designated heritage asset' in the context of the NPPF. He also noted that, *'the total loss of the heritage asset would conflict with policy CS33 of the Reading Borough Local Development Framework Core Strategy adopted 2008 (CS) which protects the historic environment and seeks its enhancement. This weighs against the proposal'* (paragraph 6 of appeal decision APP/E0345/W/18/3200081).
- 2.9 I would respectfully disagree with the Inspector's interpretation of Policy CS33 here; this policy requires that, *'Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located'*.
- 2.10 Putting aside the question of whether, in the absence of any 'balancing exercise', this policy is compliant with the NPPF, it is the position established by the 'Bohm' High Court decision ([2017] EWHC 3217 (Admin)) that, when considering 'harm' or 'adverse impacts' in relation to 'non-designated heritage assets', *'Paragraph 135 [i.e. paragraph 197 under the revised NPPF] calls for weighing "applications" that affect an NDHA, in other words the consideration under that paragraph must be of the application as a whole, not merely the demolition but also the construction of the new building'* (paragraph 34 – my emphasis).
- 2.11 Applying this logic to Policy CS33, when assessing whether there is an 'adverse impact', one must consider the "development" as a whole, not merely the demolition aspect. Indeed, this appears to be the position (in my view, quite correctly) taken by Council officers in their Committee Report for application 171719 (paragraph 6.8 quoted above).
- 2.12 As such, I would disagree with the Inspector that, through the demolition aspect alone, the previous scheme failed to comply with Policy CS33.

- 2.13 Although I accept that this would have no impact on the Inspector's overall judgement in that case (he also found against the proposed replacement design, suggesting that the overall scheme had an 'adverse impact' in heritage terms), it does have implications for the revised scheme.
- 2.14 Considering its assessment by both the Council and the Inspector as a 'non-designated heritage asset', the demolition of the existing building would, if taken in isolation, clearly be 'harmful' in heritage terms, albeit at a low level considering the limited significance of the existing building; however, when considered in the context of relevant local and national policy and guidance, the relevant assessment is, *'of the application as a whole, not merely the demolition but also the construction of the new building'* (paragraph 34 of the 'Bohm' judgement).
- 2.15 In this context, it is worth highlighting that in both the Council officers and the Inspector's recent assessments of the existing building, they identified its limited heritage interest as being related to its architectural quality (e.g. *'its heritage interest has more than sufficient architectural significance to be a material consideration'*, paragraph 5 of the Inspector's decision notice, or *'the building...(is) a relatively young Edwardian building (circa.1906) of a pleasing but relatively common "Queen Anne Revival" style, with limited historical or other architectural interest and only localised townscape value'*, paragraph 6.8 of the officers' report).
- 2.16 As this suggests, the loss of the existing building would represent heritage 'harm' through the loss of its architectural value rather than any historical value or associations. As such, there is clear scope for mitigation of this loss through its replacement with a building of sufficient architectural quality and interest.

The revised redevelopment proposals

- 2.17 Responding positively to the criticism of the proposed replacement building under application 171719 from both officers and the Inspector, the scheme architects, Ascot Design, have thoroughly revised their design approach in the development of the current application scheme.

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- 2.18 In broad terms, the revised scheme represents a more contextualised approach, drawing on the key characteristics of the existing building, which were identified by the Inspector as: *'a distinctive, curved oriel window, a four-centred arch over the entrance, stone dressings around openings, and a background of crisp, red brick in which diapering and bands are picked out in blue headers'*.
- 2.19 Significantly, the scheme also introduces a far-greater degree of articulation than the previous scheme and responds more sympathetically to the scale and character of surrounding development.
- 2.20 Indeed, one of the key benefits of taking a more contextualised approach than the previous scheme is that the less 'formal' or 'classical' design allows greater scope for articulation.
- 2.21 Moreover, although the ridge height of the proposed building is only slightly lower than that of the previous scheme, the use of a sharper roof pitch (this being drawn from the existing building) means that the current scheme reads as two to two-and-a-half storeys (i.e. as the existing building) as opposed to the full three storeys of the previous scheme.
- 2.22 Certainly, this responds directly to the Inspector's criticism of the previous scheme that houses on the street, *'share a generally consistent eaves height, stepping down the hill. The higher eaves of the proposal would step upwards from its neighbour up the hill, rather than downwards'* (paragraph 8 of appeal decision APP/E0345/W/18/3200081).
- 2.23 Notably, by setting the ridge and eaves height of the proposed building slightly lower than those of the existing building, the scheme will effectively 'step down' the street in views northwards when seen along Nos.41 & 35. Indeed, as demonstrated by the "streetscene" elevation submitted with the application, the proposed building will achieve this effect, noted as a characteristic element of the area in the Inspector's decision, more successfully than the existing, taller building.
- 2.24 In general terms, the change in roof form combined with the general increase in articulation and the provision of a narrower street frontage, with side ranges set well

back from this, result in a building that is far less 'bulky' than the previous scheme, especially in views down the hill.

- 2.25 The articulation provided by means of setting the lower, side ranges back from the frontage means that views northwards along Brunswick Hill, including from the 'spur' of the Downshire Square Conservation Area around All Saints' Garden and The Observatory, will take in the traditional design of the southern gable of the front element of the proposed building (with its ridge and eaves heights slightly lower than those of the existing building) seen alongside No.41, with the front element of the southern range just glimpsed beyond this.
- 2.26 A criticism levelled at the previous scheme was that, *'The flank elevations of the proposal are particularly unattractive, featuring large, overly-extended expanses of blank walls. In terms of impact on the streetscene, the illusion of the attempt to break up the wide frontage is likely to be lost with the way the flanks are exposed and the diagonal views, especially when looking up the hill at the northern flank, will be poor'* (officers' report paragraph 6.12).
- 2.27 A similar concern was raised by the Inspector, *'the development would appear uncharacteristically wide from the front, and its northern flank would appear unusually long and lacking in articulation'* (paragraph 7 of decision APP/E0345/W/18/3200081).
- 2.28 However, the proposed building responds directly to this concern, with articulation not confined only to the street frontage. Although the proposed building is slightly wider than the existing building, the 'setting back' of the side ranges away from the street frontage reduces the visual 'impact' of this increased width. This is aided by the removal of the existing garage on the northern side of the plot, maintaining a sizable gap with the adjacent No.35.
- 2.29 This will 'open' diagonal views along the northern side of the building to some degree, but the articulation provided by the northern 'cross-wing' projection will prevent the building from appearing over-deep or 'bland' in these oblique views.

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- 2.30 Notably, and as mentioned above, by setting the ridge height of the northern 'cross-wing' lower than that of the main portion of the building, the proposed building succeeds in 'stepping down' in scale, responding to the step of the hill.
- 2.31 A further criticism of the previous scheme raised by both the Inspector and officers was the lack of a 'front door', with the main entrance to the building 'tucked away' along a side elevation (paragraph 6.14 of the officers' report and paragraph 7 of the appeal decision).
- 2.32 The current proposals wholly address this issue, with the proposed entrance at the front of the building. Indeed, with the proposed oriel above, this bay becomes the architectural focus of the building, with the main entrance properly 'celebrated'.
- 2.33 As will be clear from this analysis, the proposed design responds directly to the detailed criticisms levelled at the previous application, bearing in mind that neither Council officers nor the Inspector indicated that the retention of the existing building need necessarily form part of any application affecting the site.
- 2.34 In general terms, the scheme represents an attractive building which responds positively to the local character, notably through its careful scaling (responding to the slope of Brunswick Hill) and its contextualised design. The design in particular draws on the character of the existing building and its use of materials, incorporating red brick with blue brick and stone dressings (the latter confined to the front elevation as on the existing building).
- 2.35 For these reasons, and those set out in more detail above, it is my firm opinion that the proposals would serve to reinforce local distinctiveness and maintain the character and appearance of the area, albeit that this is not a conservation area.
- 2.36 Moreover, having given consideration to the limited views towards the site from the nearby Downshire Square Conservation Area (bearing in mind that no views towards Brunswick Hill are among the 'key views' identified in Reading Borough Council's 2009 'Downshire Square Conservation Area Appraisal'), I am firmly of the view that the scheme will result in no 'harm' to that designated heritage asset through the effect on its setting.

Paragraph 197 of the NPPF and a 'balanced judgement'

- 2.37 As discussed in detail above, the revised proposals represent a sympathetic scheme which responds positively to the scale and character of development in the surrounding area.
- 2.38 When considering the effects of the application scheme as a whole in heritage terms, it is my considered opinion that quality and sensitivity of the proposed design will serve to mitigate to a good degree the loss of the existing 'non-designated heritage asset' in the context of paragraph 197 of the NPPF.
- 2.39 While the NPPF does not provide any guidance as to what weight should be given to any particular matter in administering the 'balanced judgement' required by paragraph 197, the mitigation provided by the proposed replacement building should be considered alongside the 'public benefits' arising from the proposals. These are set out in detail in the Planning Statement by Davis Planning Ltd. but include the provision of additional housing units.

3.0 CONCLUSION

- 3.1 This report has assessed the effects of the application proposals in built heritage terms, notably in the context of the officers' report for application 171719 and the Inspector's decision for appeal APP/E0345/W/18/3200081.
- 3.2 The application scheme has been thoroughly revised since that application and appeal and the revised scheme responds positively to feedback received from both the Council and the Inspector.
- 3.3 For the reasons set out more thoroughly in the main body of this report, it is my considered opinion that the application scheme represents a substantial improvement on the previous proposals.
- 3.4 While it is accepted that the scheme will result in the loss of a 'non-designated heritage asset', this must be considered in the context of the low heritage interest of the building (i.e. Council officers are of the opinion that it does not meet the criteria for inclusion on the local list) and officers' recent stated opinion that, *'there would be no in principle objection to a residential redevelopment of the site, involving the loss of the existing property'* (paragraph 6.8 of the officers' report for application 171719).
- 3.5 Notably, in the context of the 'balanced judgement' required by paragraph 197 of the NPPF, the replacement building will mitigate this loss of the existing building to a good degree while the 'public benefits' of the scheme (as set out in the Planning Statement prepared by Davis Planning Ltd.) must also be taken into account, including the provision of additional housing units.