

Existing private car park, East Street, Reading

Townscape, Heritage And Visual Impact Assessment: Section 73 Application

December 2018

Consultancy for the
Historic Built Environment

KMIHeritage

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1 Introduction

- 1.1 This report has been prepared in order to an application for planning permission in respect of proposals for land at the northern end of East Street, Reading. The report has been prepared on behalf of Studios Construction (Reading) Ltd.

Background

- 1.2 An application for planning permission (ref 170019) for the proposed application was refused by Reading Borough Council on 7th June 2017. The application was for:

Erection of a 4 storey building to provide 103 student accommodation units (Sui Generis), landscaping, access and ancillary works, following removal of a 49 space car park.

- 1.3 The proposals had been the subject of pre-application discussions, prior to the submission of the planning application on 5th January 2017, and had been revised during the determination period.
- 1.4 An appeal (ref. APP/E0345/W/17/3190317) against the refusal of planning permission for the development of the site was allowed on 10 August 2018, and planning permission granted with conditions.
- 1.5 This is referred to herein as ‘the extant permission’.
- 1.6 The following is now proposed:

Minor material amendments to APP/E0345/W/17/3190317 (as amended by 181629) for: 5 additional student accommodation units, associated external alterations and changes to internal layout.

- 1.7 This is referred to herein as ‘the proposed application’.

Purpose

- 1.8 The purpose of the report is to assess the proposed application for the East Street site against national and local policies and guidance relating to the historic built environment and for architectural and urban design.
- 1.9 The proposed application is for a building that is similar in nearly all respects to the scheme that was allowed on appeal. The proposed changes are to add five additional rooms at ground level in lieu of amenity space and the management office as well as a reduction in the size of the basement. The elevations will have minor changes given the fenestration requirements of these extra rooms.
- 1.10 This report should be read in conjunction with the drawings and Design & Access Statement prepared by GDL Architecture, and other application material.

Role

- 1.11 KMHeritage was not involved in the preparation of the refused application. KMHeritage was appointed in October 2017 to assess and independently review the refused planning application and to comment upon the Council's consideration of the scheme. Its favourable assessment of the refused planning application was used in support of the successful planning appeal.

Methodology

- 1.12 A considerable amount of work was undertaken as part of the original application process to identify and assess heritage assets and townscape character, and the levels of significance found in both. In our independent assessment of the successful appeal scheme we did not repeat that work with a separate exercise in identification and analysis. That work was undertaken by Orion Heritage and included in a Heritage Assessment, which was submitted to the Council as part of the application process. This is a thorough and comprehensive report,

whose information and assessment remains valid at the time of writing of this report.

Nomenclature

- 1.13 The land in question is referred to as ‘the site’ throughout this report’.
- 1.14 In 2015 English Heritage changed its name to ‘Historic England’ and a new charity, officially called the English Heritage Trust, took the name of English Heritage and responsibility for managing the National Heritage Collection of more than 400 state-owned historic sites and monuments across England. In this report reference is made both to ‘English Heritage’ and ‘Historic England’.

Organisation

- 1.15 This introduction is followed by an assessment of the site and its surroundings. Section 3 is assessment of the design of the proposed application and Section 4 is a separate consideration of the effect of the proposed application on heritage assets. Section 5 outlines the national and local policy and guidance that is relevant to this matter. Section 6 assesses the proposed application against policy and guidance. Section 7 is a summary and conclusion.

Author

- 1.16 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation.

- 1.17 Further research, analysis and drafting for this report was undertaken by Anne Roache M.A. Anne is an experienced researcher of over 25 years experience having worked for leading commercial organisations in the fields of property, planning and law. Alongside a specialisation in the archaeology, architectural and social history of London; Anne is also a qualified Field Ecologist, experienced in carrying out a range of ecological surveys.

2 The site and its surroundings

Introduction

- 2.1 The site is located at the northern end of East Street, within Sub-area 1 (London Street) of the Market Place/London Street Conservation Area.
- 2.2 The proposed application is illustrated in the drawings and Addendum Design & Access Statement. The Design & Access Statement includes a description of the site and its surroundings; this work is found at Sections 1.2, 1.3 and 1.4.

The relevant heritage assets

- 2.3 The Heritage Assessment prepared by Orion Heritage (January 2017) in support of the successful appeal scheme contained an assessment of heritage assets. Paragraph 3.7 of the Heritage Assessment identified seven heritage assets that require detailed consideration in assessing the effect of the proposed application on heritage and townscape significance. We agree with this selection, which is as follows:
- The Market Place/London Street Conservation Area
 - 33 London Street (The Great Expectations Hotel), Grade II
 - 35 London Street (Grade II)
 - 37 and 39 London Street (Grade II)
 - 24 41 London Street (Grade II)
 - Queen's Crescent (Grade II)
 - 25 Church of St Giles (Grade II)
- 2.4 We have also considered the non-designated heritage assets in the vicinity of the site – the Buildings of

Townscape Merit identified in the conservation area appraisal:

- 43, 45 and 47 London Street
- 1-4 London Court

2.5 The 'townscape appraisal map' in the conservation area appraisal (see Figure 1) shows the boundary of the conservation area and the location of statutorily listed buildings and Buildings of Townscape Merit.



Figure 1: the part of the Market Place/London Street Conservation Area in the vicinity of the site (shown with a dotted red line) (© Reading Borough Council). Red indicates listed buildings, green indicates Buildings of Townscape Merit, blue arrows indicate 'important views'. Blue shading indicates the development site.

The nature of the site and its surroundings

- 2.6 The site is located on the eastern boundary of the conservation area and the clear focus of this part of the sub-area is the historic route of London Street. The conservation area appraisal¹ makes no reference at all to the site. In listing ‘features that make a positive contribution to the historic character and appearance of the conservation area’ the item that may refer to the site is ‘Side alleys and streets which afford glimpses and views to east and west’ though these are not identified in the text or in the ‘townscape appraisal map’ at the end of the document. The site is also not mentioned when ‘features that have a negative impact on the historic character and appearance of the conservation area’ are listed in the conservation area appraisal. Indeed, the conservation area appraisal makes no reference at all to East Street, other than to say ‘the west side of East Street, is predominantly modern in character and appearance’.

Heritage and townscape significance

Concepts and terminology

- 2.7 The listed buildings and conservation area are ‘designated heritage assets’, as defined by the National Planning Policy Framework (NPPF). Locally listed buildings (the Buildings of Townscape Merit) can be considered as ‘non-designated heritage assets’.
- 2.8 Significance’ is defined in the NPPF as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.’ The English Heritage publication

¹ The conservation area appraisal is undated, though it would appear, in reference to policy and guidance, to pre-date the adoption of the current Core Strategy (2008, amended 2015) and the Sites and Detailed Policies document (2012, amended 2015), as well as the National Planning Policy Framework (2012).

‘Planning for the Historic Environment Practice Guide’ defines significance as ‘the sum of its architectural, historic, artistic or archaeological interest’.

- 2.9 ‘Conservation Principles, Policies and Guidance for the sustainable management of the historic environment’ (English Heritage, April 2008) describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value.
- 2.10 The conservation area and listed buildings have evident special architectural and historic interest. Any proposals for the site must have regard for the preservation of that special interest, and the local significance of the Buildings of Townscape Merit.

Assessment

- 2.11 The following general commentary is concerned with the site and its surroundings to the extent that they may be affected by the proposed application.
- 2.12 Further and more detailed commentary is provided later in this report when the proposed application is discussed in Section 5.

‘Evidential value’

- 2.13 The listed and unlisted buildings of merit in the vicinity of the site, and their relationship to one another and the conservation areas, collectively illustrate the development of this part of Reading. They tell how Reading evolved during the 19th and 20th centuries and in particular about the transformation of the area from the mid-late 19th century onwards. The recent history of the site provides evidence of the substantial changes brought about by redevelopment and transport initiatives (such as Queen’s Road) in the late 20th century and the early 21st century. The area and its buildings are a record of social and economic change and lifestyles in various periods, and illustrate the effect these things had on the historic building stock and urban grain.

- 2.14 In terms of Historic England's 'Conservation Principles' the site and its surroundings provide us with 'evidence about past human activity' and, by means of the fabric, design and appearance of the site and surrounding built form, communicates information about its past. Alteration, demolition and redevelopment has not entirely removed the ability of the site and other historic buildings in the vicinity to do this, and the site and the conservation area retains sufficient historic character and appearance to convey historical ethos. However, the specific area south of Queens Road and east of London Street has been considerably denuded of its historical character.

'Historic interest' or 'Historical value'

- 2.15 London Street clearly has historical significance, given the nature of its role in Reading's southern development and in terms of the origins, historical uses and associations of its listed buildings and Buildings of Townscape Merit. There is practically nothing of any historic interest or historical value to the east of London Street within the conservation area, and this includes the modern rear parts of the listed buildings facing the application site.

'Architectural interest', 'artistic interest' or 'aesthetic value'

- 2.16 Again, London Street and its older buildings possess aesthetic value in a variety of ways, but this very evidently does not extend to the more recent, low quality rear parts of each of the listed buildings. The aesthetic quality of the existing site and its immediate context is, by any measure, very poor and detracts from the character and appearance of the conservation area and the setting of the listed buildings

Conclusion

- 2.17 In our view, the part of the conservation area in which the site located is unrepresentative of what is significant in the overall conservation area or Sub-area 1, and which is described in the conservation area appraisal. The conservation area appraisal is correct: the character and

appearance of East Street, whether within or outside a conservation area, is almost entirely that of the last thirty to forty years². In contrast to linearity, continuous street enclosure and distinctive historic character of London Street, East Street is characterised by recent object buildings designed to be contemporary but contextual. East Street is a modern street with no historic character or particular significance beyond its route.

- 2.18 In our opinion, the nature and appearance of East Street now detracts from the conservation area in two key ways. Firstly, unintended views of the rear parts of the buildings forming the edge of London Street have been created by recent development that has not respected the language of ‘side alleys and streets’ mentioned in the conservation area appraisal, and where too much open space has been created – such as in London Court. Historically East Street possessed a finer grain and a more consistent street enclosure, and it connected to Queen’s Road. In particular, the modern closure of East Street at its northern end has resulted in an unfortunate ‘hammerhead’ street layout that has no historical basis. The open space of the site is an anomaly in urban terms.
- 2.19 Secondly, East Street contains the surface car park site that is the subject of the proposed application. Its appearance and condition clearly detract from the conservation area. It, and the higher level surface car park to the west, adjacent to the listed buildings on London Street, are precisely the kind of unattractive modern feature that are inherently at odds with the historic character and appearance of conservation areas. The site is ugly and should be occupied by built form rather than being open. The exposed view of the rear parts of the listed buildings at 33 to 47 London Street and the Buildings of Townscape Merit at 1-4 London Court is, in our opinion, ahistorical, artificial and harmful. It detracts not just from the

² The only exception to this appears to be the inter-war former employment exchange at the junction with South Street, now in use as the South Street Arts Centre - which is not within a conservation area or locally listed.

conservation area, but from the setting of the other heritage assets in question.

- 2.20 While it is unlikely that the overall character of East Street is likely to change to a degree that would make it more consistent with that of the rest of the conservation area, new development on the site of the proposed application would enhance the conservation area and the setting of listed buildings, as well as that of Buildings of Townscape Merit.

3 The legislative and policy context

Introduction

- 3.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.
- 3.2 Section 6 demonstrates how the proposed application complies with statute, policy and guidance. Not all the guidance set out in this section is analysed in this manner in Section 6: some of the guidance set out below has served as a means of analysing or assessing the existing site and its surroundings in this report, and in reaching conclusions about the effect of the proposed application. Section 6 is concerned with how legislation and the adopted local plan are satisfied by the proposed application.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.3 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66(1) of the Act requires decision makers to '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' when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework

- 3.4 The Government published the revised version of the National Planning Policy Framework (NPPF) on 24 July 2018.

- 3.5 Chapter 12. of the National Planning Policy Framework deals with design: Achieving well-designed places. It begins:

‘The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process’ (paragraph 124).

- 3.6 Paragraph 127 advises that ‘planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Proposals affecting heritage assets

- 3.7 Chapter 16 of the National Planning Policy Framework: ‘Conserving and enhancing the historic environment’ deals with Heritage Assets describing them as ‘an irreplaceable resource’ that ‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’.³
- 3.8 Paragraph 189 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that:

‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’

- 3.9 In terms of the local authority, paragraph 190 requires that they ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between

³ The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

the heritage asset's conservation and any aspect of the proposal.'

3.10 Paragraph 192 says that:

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

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

3.11 Paragraph 193 advises local planning authorities that 'When considering the impact of a proposed application on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

3.12 Paragraph 195 says:

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

- the nature of the heritage asset prevents all reasonable uses of the site; and*

- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

- 3.13 Paragraph 196 says that ‘where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use’ (paragraph 196).
- 3.14 In taking into account the effect of an application on the significance of a non-designated heritage asset the local authority should employ a ‘a balanced judgement’ in regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 197).
- 3.15 The NPPF introduces the requirement that ‘Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred (paragraph 198).
- 3.16 Where a heritage asset is to be lost, the developer will be required to ‘record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible’ (paragraph 199).⁴
- 3.17 In terms of enhancing the setting of heritage assets the NPPF states that ‘local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of

⁴ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.

heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. (paragraph 200).

- 3.18 It goes on however that ‘Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site 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 Conservation Area or World Heritage Site as a whole’ (paragraph 201).
- 3.19 Finally, paragraph 202 requires that the onus will be on local planning authorities to ‘assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies’.

Planning Practice Guidance

- 3.20 In 2014 the government published new streamlined planning practice guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled ‘Conserving and Enhancing the Historic Environment’. It is subdivided into sections giving specific advice in the following areas:
- Historic Environment Policy and Legislation
 - Heritage in Local Plans
 - Decision-taking: Historic Environment
 - Designated Heritage Assets
 - Non-Designated Assets

- Heritage Consent Processes and
- Consultation Requirements

Historic England's Good Practice Advice in Planning Notes

- 3.21 The NPPF incorporates many of the essential concepts in Planning Policy Statement 5 'Planning for the Historic Environment'. PPS5 was accompanied by a 'Planning for the Historic Environment Practice Guide', published by English Heritage 'to help practitioners implement the policy, including the legislative requirements that underpin it'. In the light of the introduction of the NPPF, Good Practice Advice notes 1, 2 and 3 supersede the PPS 5 Practice Guide, which was withdrawn on 27 March 2015. These notes are:
- Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
 - Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets

Reading's Local Plan

- 3.22 Local policy regarding the determination of planning applications is contained in a series of documents including the Core Strategy (2008, amended 2015) and the Sites and Detailed Policies document (2012, amended 2015).
- 3.23 Policy CS7 deals with 'Design and the Public Realm', and states:

All development must be of high design quality that maintains and enhances the character and appearance of

the area of Reading in which it is located. The various components of development form, including:

- *Layout: urban structure and urban grain;*
- *Landscape;*
- *Density and mix;*
- *Scale: height and massing; and*
- *Architectural detail and materials*

will be assessed to ensure that the development proposed makes a positive contribution to the following urban design objectives:

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

Developments will also be assessed to ensure that they:

- *Respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough and providing value to the public realm;*

- *Create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion;*
- *Address the needs of all in society and are accessible, usable and easy to understand by them; and*
- *Are visually attractive as a result of good high quality built forms and spaces, the inclusion of public art and appropriate materials and landscaping.*

Applications for major and minor developments should be accompanied by a design and access statement that deal with all the above matters.

3.24 Policy CS33 deals with ‘Protection and Enhancement of the Historic Environment’, and says:

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

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens*

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.

3.25 Policy DM4 deals with ‘Safeguarding Amenity’ and states:

Development will not cause a significant detrimental impact to the living environment of existing or new residential properties, in terms of:

- *Privacy and overlooking;*
- *Access to sunlight and daylight;*
- *Visual dominance and overbearing effects of a development;*
- *Noise and disturbance;*
- *Artificial lighting;*
- *Vibration;*
- *Dust and fumes;*
- *Smell; or*
- *Crime and safety.*

The position of habitable rooms, windows and outdoor living spaces will be particularly important. A back-to-back distance of 20 metres between dwellings is usually appropriate, although the circumstances on individual sites may enable dwellings to be closer without a detrimental effect on privacy.

As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable.

Where an otherwise acceptable development could change its character to a use that would have a greater impact on amenity without needing planning permission, conditions will be applied to restrict such changes.

Historic England guidance on the setting of heritage assets

- 3.26 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets provides guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. The document provides 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG)'.
- 3.27 The guidance echoes the definition of 'setting' in the NPPF as 'the surroundings in which [the asset] is experienced' and continues: 'its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.
- 3.28 The guidance provides, at Paragraph 12, a step-by-step methodology for identifying setting, its contribution to the significance of a heritage asset, and the assessment of the effect of proposed application on that significance:
- Step 1: identify which heritage assets and their settings are affected;
 - Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
 - Step 3: assess the effects of the proposed application, whether beneficial or harmful, on that significance;
 - Step 4: explore the way to maximise enhancement and avoid or minimise harm;

- Step 5: make and document the decision and monitor outcomes.
- 3.29 The document then sets out how the step-by-step methodology is used and considers each step in more detail.

4 The design of the proposed application and its townscape effect

Introduction

- 4.1 The proposed application is illustrated in the drawings and Design & Access Statement prepared by GDL Architecture.
- 4.2 This section of our report deals with architectural and townscape matters, while the next section focuses specifically upon the effect of the development on heritage significance. However, these two areas overlap, so some repetition is inevitable.

Background

- 4.3 An appeal (ref. APP/E0345/W/17/3190317) against the refusal of planning permission ref 170019 for the development of the site was allowed on 10 August 2018, and planning permission granted with conditions. A new scheme, similar to that allowed on appeal, is now proposed.
- 4.4 The proposed application is for a building that is similar in nearly all respects to the scheme that was allowed on appeal. The proposed changes are to add five additional rooms at ground level in lieu of amenity space and the management office as well as a reduction in the size of the basement. The elevations will have minor changes given the fenestration requirements of these extra rooms.
- 4.5 The following assessment is therefore similar to that in respect of the scheme permitted at appeal.

Form and massing

- 4.6 The site is L-shaped, and the proposed application occupies the site to maximise its efficiency and avoid inappropriate leftover open space. The building will create a meaningful corner – where the entrance to the building is located – that will help enclose the

‘hammerhead’ street arrangement at the northern end of East Street. The chamfered corner form, containing the building entrance, helps give the amorphous space south of New Century Place greater focus.

- 4.7 The facades of the proposed application facing East Street have been divided into a series of projecting and recessed bays that help to break down the overall mass of the proposal. The building has a satisfying vertical hierarchy – a lighter coloured base at ground level, the three storey ‘middle’, and differentiated top storey. This creates a unity and integration in the design, helped by the vertical alignment of fenestration between base and top.

Scale

- 4.8 The proposed application would be – as shown very clearly in the submission material and in particular in the photomontages – similar to or lower in scale than other existing development. The Design & Access Statement illustrates this and shows that the proposed application is sufficiently subservient in scale. The building is set into the south-to-north slope of the site. It would be consistent in scale not just with the overall scale of East Street but also with the more significant streetscape of London Street. Finally, the top floor is differentiated from the main elevation and this helps to reduce the perceived scale of the building further.

Materials, detailing and architectural approach

- 4.9 The design is evidently of its time while using red brick as a material that is found in the immediate environs. Red brick is a material characteristic of the conservation area and is found not just in newer development adjacent to the site, but in older buildings on South Street and London Street.
- 4.10 The proposed application is, in our opinion, of a higher architectural quality than other recent development on East Street. Most of these developments have adopted an uneasy pastiche style – using, for instance, pitched roofs

and ‘traditional’ windows to try and create a version of a historic environment. The proposed application, in contrast, avoids this confusion, and is unmistakably contemporary while – as noted above – recreating a correct street edge with a building that respects local scale.

- 4.11 The facades of the proposed application facing East Street have been divided into a series of projecting and recessed bays that help to break down the overall mass of the proposal.

Landscaping

- 4.12 In our opinion, the landscape design component of the overall design helps to soften the appearance of the proposed building and mitigate the scale of the scheme. There is clearly a substantial amount of landscaping proposed – the Addendum Design & Access Statement shows a 3 metre soft landscaping zone facing East Street, a similarly scaled zone of soft landscaping on the north western side of the development and a significant area of mixed hard and soft landscaping to the rear of the building.

Views

- 4.13 Narrow gaps exist between 33 London Street and the modern building at the junction of London Street and Queens Road; between 39 and 41 London Street and at the entrance to London Court. It is clear from the application material that little or nothing of the proposed application would be visible in the first or third of these gaps. It is likely that the upper parts of the proposed application will be seen through the gap between 39 and 41 London Street, visible above and behind the raised car park that sits between the site and the rear parts of buildings facing London Street – once the viewer has stopped at the entrance to look or penetrated to the space of the alley way and is walking up its length. The view from London Street is a fleeting one, and, by virtue of the

rising slope of the alley way, the view from the western side of London Street is largely one of the alley way surface.

- 4.14 That the proposed application might be fleetingly visible is entirely appropriate. The view through these gaps did not have historically, and does not now rely for its townscape value upon, a lack of visual termination. It is fitting that the gap between 39 and 41 London Street is terminated by a building, as this was historically the case. The present lack of termination in the view through this gap is artificial, and the product of demolition to create the surface car park that is the site.

Conclusion

- 4.15 The general design approach of the proposed application is consistent with the modern character and appearance of East Street. The scale of the proposed application is respectful and the height of the building causes it to sit comfortably within the East Street streetscape. The proposal helps to reinstate missing urban form where it should exist, recreates a street edge where it is lacking, and helps to create a meaningful sense of enclosure for the 'hammerhead' at the northern end of East Street.
- 4.16 The proposed application is essentially the same as the scheme permitted on appeal. The minor amendments proposed make no significant difference in heritage and townscape terms. The design is essentially as permitted at appeal. The heritage and townscape effects of the proposed application are the same as those of the permitted scheme.
- 4.17 The proposed application remains of an appropriate scale and design, and it represents a very substantial improvement in the appearance and quality of the built environment in and around the site.

5 The heritage effects of the proposed application

Introduction

- 5.1 This section describes the effect of the proposed application on the heritage significance identified earlier in this report.

The conservation area

- 5.2 As stated earlier, the site detracts from the conservation area by virtue of its inappropriate and unhistorical openness and its poor visual quality. What is of special architectural or historic interest in the conservation area is not found on its boundary on East Street. That special architectural or historic interest, in this part of the conservation area, lies to the west and south, and focussed on London Street. There is very limited intervisibility between the site and London Street, and where such visibility occurs it is fleeting. In addition, in the single meaningful opening in the eastern street wall of London Street - between 39 and 41 London Street - the land rises between the pavement of London Street and the surface car park that presently terminates the view.
- 5.3 The scale, form and massing, and architectural treatment of the scheme respect the setting of those nearest parts of the conservation area that have special interest – the building occupies its site so as to recreate a lost street edge, its scale is equal to or less than adjacent older buildings (listed and unlisted) to the west and south, and its overall form and mass is broken down by the articulation of the elevations in a series of bays. The footprint of the building is such as to distance the building from structures of heritage significance to the west and south, and – as we discuss further below – the less significant rear parts of buildings facing London Street act as visual buffers between the scheme and the part of

the conservation area of heritage significance in the vicinity of the site.

- 5.4 In our opinion, therefore, the proposed application would preserve and enhance the Market Place/London Street Conservation Area.

Listed buildings

- 5.5 In our view an important consideration is the basic distinction between the main parts of the listed buildings adjacent to London Street facing into that street and the parts adjacent to the site. Put simply, the listed buildings may have heritage significance throughout, for various reasons, but the core special architectural or historic interest of the listed buildings must be considered as being found in those parts on London Street. This is also very evident in the modern alteration and extension that has occurred to the rear of the listed buildings and the Buildings of Townscape Merit.
- 5.6 The proposed application will not affect what special architectural or historic interest exists within the listed buildings, and so we focus on their external special interest.

33 London Street (The Great Expectations Hotel), Grade II

- 5.7 The rear parts of this listed building facing the site are very evidently of lesser significance than the principal part facing London Street. That part of the listed building is an impressive example of early Victorian (in architectural terms it is perhaps better described as late Georgian) neo-classicism, made with stone and with fine detailing. It is a striking and expressive piece of architecture. In contrast, the rear part of the site of 33 London Street is occupied by an oblong brick building with a slated pitched roof. That this part may have been added in 1866 to accommodate the former Methodist chapel (subsequently converted to become a cinema) gives it a certain level of historical interest but its architectural interest is indisputably low. It is a plain and utilitarian structure that was not given

anything other than the most basic architectural treatment, probably because of its location in the centre of the block. The structure has been altered by the installation of modern windows and the two windows on the small projecting part nearest the site of the proposed application have concrete lintols.

- 5.8 The proposed application would remain 11-12 metres away from the rearmost part of the listed building (the small projection with the modern window openings), a generous gap that is more than adequate to appreciate the size and layout of the rear of the listed building. In addition, the northern elevation of the proposed application would sit approximately 6-7 metres south of the northern elevation of the rear part of 33 London Street, thus partially maintaining the long view from East Street of the rear of 33 London Street. The proposed application would clearly preserve the special interest of the listed building and, in replacing the car park site with a well-designed new building, would enhance its setting.

35 London Street (Grade II)

- 5.9 This is a building that, like its neighbour to the north, presents an impressive face to London Street despite the poor quality of its modern ground floor shop front. Again, the contrast between the elaborate architecture of its main façade with the situation to its rear is marked. The listed building is effectively no deeper than the other buildings facing London Street. The low 1-2 storey pitched roof extension to its rear is of no architectural quality. The main rear wall of the listed building is, as is entirely normal, plain and unremarkable. While it is possible to see the rear of the building from East Street, this view was never of a principal façade.
- 5.10 The proposed application is slightly further from the rear part of the 1-2 storey rear extension to 35 London Street than from 33 London Street, but over 40 metres from the main rear elevation of 35 London Street. Again, the scheme would clearly preserve the special interest of this

listed building and, in replacing the car park site with a well-designed new building, would enhance its presently low-quality setting.

37 and 39 London Street (Grade II)

- 5.11 These are characterful 18th century houses, though marred by the modern shop front that inappropriately cuts across 35-39 London Street. Like No. 35, the actual depth of the main listed buildings is shallow, and does not extend to the immediate vicinity of the site. At the rear part of the site of No. 37 is a small, blocky modern building of no architectural quality whatsoever.
- 5.12 It is questionable whether the cottages in the alleyway between 39 and 41 London Street should be considered as part of the listed building at 39 London Street, as they are so clearly separate structures (regardless of physical connection), differ in quality and have been considerably altered. Immediately to their east, facing the site, is a single storey pitched roof shed-like building in red brick. It possesses no special architectural or historic interest at all. The cottages and the shed do possess historical interest as more modest buildings set on a 'yard' off London Street and they illustrate the nature and evolution of the conservation area, but this quality is diminished somewhat by the damaged and exposed nature of the alleyway at its eastern end.
- 5.13 As with No. 35, the proposed application will remain at a significant distance from the main rear elevation of 37 and 39 London Street, and it will enhance their special architectural or historic interest by improving their setting over the present condition. Even if considered to be listed, the buildings on the northern side of the alleyway between 39 and 41 London Street have minimal architectural interest and what historical interest they have is clearly preserved by the proposed application. In views along the alleyway, only the uppermost part of the proposed application will be seen above the car park nearest London Street, and the distance from the main

rear wall of 39 London Street to the visible rear façade of the proposed application will be in the order of 60 metres.

41 London Street (Grade II)

- 5.14 As with Nos 33 and 35 London Street, this building has a highly articulated elevation to London Street and much plainer rear parts. A blank rear wall faces eastwards towards the site. The ground floor facing along the alley has been altered. Of the listed buildings in the group at 33-41 London Street, this is the only building that can be appreciated in the round. This doesn't alter the evident hierarchy in special interest, which is located primarily in the parts facing London Street. The immediate setting to its rear is of poor quality – as is the open space of the car park between it and the site. The proposed application will be approximately 55 metres from the rear façade of 41 London Street, and will enhance the setting of the listed building.

Queen's Crescent (Grade II)

- 5.15 The Design & Access Statement makes it clear that the proposed application would not appear above the ridgeline of Queen's Crescent. There is no effect from the development. The proposed application therefore preserves the special architectural and historic interest of the listed terrace.

Church of St Giles (Grade II)

- 5.16 We agree with Orion Heritage's assessment (in their 2017 report) regarding the loss of the view of the spire of St Giles that is caused by the scheme. The view that can be obtained from East Street is largely a function of the inappropriate openness of the site. The view cannot, with reference to Historic England's guidance on the setting of heritage assets (see the next section of this report) be meaningfully said to make the site or this part of East Street a component of the setting of the listed church. The loss of the view does not, in our opinion, harm the special

interest of the church and that special interest is therefore preserved.

Buildings of Townscape Merit

- 5.17 The same distinction must be made regarding the front and rear parts of 43, 45 and 47 London Street, as well as 1-4 London Court that we make above in respect of the listed buildings at 33-41 London Street. The rear parts of each of these Buildings of Townscape Merit are evidently of lesser significance than their fronts. 43, 45 and 47 London Street have a far less direct relationship with the site than the relatively insignificant rear parts of 33-41 London Street. 1-4 London Court presents a largely blank brick wall facing the site, and a very undistinguished, white-rendered block sits behind 41 and 43 London Street. The proposed application will have a negligible effect of these buildings.

Conclusion

- 5.18 It is very questionable whether the rear parts of Nos 35-39 London Street should be considered as listed, given the evident lack of special architectural or historic interest to be found in those parts. The cottages to the rear of 39 London Street have sufficient local interest to merit inclusion in the conservation area and the brick block to the rear of 33 London Street obviously forms part of the historical interest of that building. Regardless of the inclusive legal definition of the extent of listing, a proper analysis of special interest in these listed buildings cannot sensibly allocate equal significance across the whole of their sites.
- 5.19 In broad terms the judgement regarding the effect of the proposed application on the external special interest of the listed buildings at 33-41 London Street should be of the effect of the scheme on their main parts facing London Street. The proposed application would, without doubt, preserve their special architectural or historic interest.

- 5.20 For the reasons given above we agree with Orion Heritage regarding the minimal effect of the proposed application on Queens' Crescent and St Giles Church, and the scheme will therefore preserve the special interest of both these listed structures.
- 5.21 The same is true of the special interest of the conservation area. The proposed application is well-designed and will indisputably improve this part of the conservation area over its present condition. It therefore preserves and enhances the conservation area.
- 5.22 Finally, and to repeat the important point made in the previous section: the proposed application is essentially the same as the scheme permitted on appeal. The minor amendments proposed make no significant difference in heritage and townscape terms. The design is essentially as permitted at appeal. The heritage and townscape effects of the proposed application are the same as those of the permitted scheme. The proposed application remains of an appropriate scale and design, and it preserves and enhances the conservation area and the setting of listed and unlisted buildings.

6 Compliance with legislation, policy and guidance

- 6.1 This report has provided an independent, detailed description and analysis of the significance of townscape and heritage significance of the East Street site and its heritage context, as required by Paragraph 189 of the National Planning Policy Framework. In addition, the report also describes (in Sections 4 and 5) how the proposed application will affect heritage and townscape significance. The effect is positive, and for that reason, the scheme complies with policy and guidance. This section should be read with Sections 4 and 5.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.2 The conclusion of our assessment, as noted above, is that the proposed application at the East Street site will preserve the setting of listed buildings and preserve and enhance the character and appearance of the Market Place/London Road Conservation Area. The proposed application thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.3 It is important to note that the legal requirement regarding satisfying Section 72(1) of the Act was established by *South Lakeland District Council v Secretary of State for the Environment and another* [1992] 1 ALL ER 573 and is met if the proposed application leaves conservation areas unharmed. We believe that it would be difficult to characterise the proposed application as doing anything less than leaving the conservation areas in question unharmed.

The level of ‘harm’ caused by the proposed application to heritage assets

- 6.4 As outlined in Section 5, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm...or total loss of significance’ or ‘less than substantial’. Both levels of harm must be caused to a *designated* heritage asset – in this case, the listed buildings, conservation areas, the registered landscape and the World Heritage Site.
- 6.5 The only potential for ‘substantial’ harm would be if the proposed application for the site caused the loss of something *central* to the special interest of these heritage assets. The proposal evidently does not give rise to this level of harm. We do not believe that any ‘less than substantial harm’ is caused by the scheme.
- 6.6 In any event, the public and heritage benefits of the proposed application more than outweigh any very low - and non-material - level of ‘less than substantial harm’ that *might* be asserted as being caused by the proposed application.

The balance of ‘harm’ versus benefit

- 6.7 In any event, the scheme provides a heritage benefit in the form of enhancement over the present situation that is explained earlier in this report and the Design & Access Statement. The various points made earlier concerning the proposed application constitute tangible heritage benefits. The special architectural and historic interest of the nearby listed buildings is preserved and the special architectural or historic interest conservation area is preserved and enhanced as a result of the proposed application.

The National Planning Policy Framework

- 6.8 This report has provided a detailed description and analysis of the significance of the site and its context, as

required by Paragraph 189 of the National Planning Policy Framework.

- 6.9 The proposal satisfies Paragraph 192, sustaining and enhancing the heritage significance of the conservation area and its listed and unlisted buildings, putting the site in a viable use consistent with the conservation and enhancement of that significance. The scheme also makes a sustainable and positive contribution to the community and economic vitality of this part of Reading.
- 6.10 The proposed application complies with Paragraph 193 and 194 of the NPPF in that it conserves the heritage assets in question. We do not believe that the scheme involves any 'less than substantial harm to the significance of a designated heritage asset', but any such 'less than substantial harm' that *may* be ascribed to the scheme is greatly outweighed by the public and heritage benefits generated by the scheme in terms of helping to sustain the site in its 'optimum viable use' over the long term, satisfying paragraph 196.
- 6.11 The proposed application certainly 'enhances and reveals the significance of the heritage asset/the setting of heritage/preserve those elements of the setting that make a positive contribution to the asset' as required by paragraph 200.

Local Policy: Reading's Local Plan

- 6.12 In our view, the proposed application readily complies with Reading's Local Plan policies referred to by the Council in refusing planning permission for the proposed application. Our reasoning is set out in Sections 4 and 5.
- 6.13 We believe that – for the reasons we give – each of the criteria contained in Policy CS7 are met. The scheme will have a clear identity, will recreate the street edge and help to provide a sense of enclosure in East Street where it is lacking, thus assisting in the improvement of the public realm, and will similarly create a more meaningful and less amorphous space between it and the rear of London

Street. The drawings and Design & Access Statement make fully clear that the proposed landscaping has been carefully considered and is appropriate. The scheme will be legible in architectural and townscape terms. The layout and construction of the building will not preclude adaptation over time, the proposed use is relevant to housing needs of Reading as a town, and will assist in creating a healthy and sustainable mix of uses in this part of the conservation area and Reading. In our opinion, the layout, landscaping, density, mix, scale, height, massing and architectural approach have all been well considered and the result is a high quality and appropriate design.

- 6.14 Our detailed reasons as to why the proposed application will comply with Policy CS33 regarding the protection of the historic environment are contained in the previous section of this report.

7 Summary and conclusion

- 7.1 An appeal (ref. APP/E0345/W/17/3190317) against the refusal of planning permission ref 170019 for the development of the site was allowed on 10 August 2018, and planning permission granted with conditions. A new scheme, similar to that allowed on appeal, is now proposed.
- 7.2 The proposed application is for a building that is similar in nearly all respects to the scheme that was allowed on appeal. The proposed changes are to add five additional rooms at ground level in lieu of amenity space and the management office as well as a reduction in the size of the basement. The elevations will have minor changes given the fenestration requirements of these extra rooms.
- 7.3 The site is located at the northern end of East Street, within Sub-area 1 (London Street) of the Market Place/London Street Conservation Area. The conservation area appraisal makes no reference at all to East Street, other than to say 'the west side of East Street, is predominantly modern in character and appearance'.
- 7.4 In our view the part of the conservation area in which the site located is unrepresentative of what is significant in the overall conservation area or Sub-area 1, and which is described in the conservation area appraisal. The character and appearance of East Street, whether within or outside a conservation area, is almost entirely that of the last thirty to forty years. In contrast to linearity, continuous street enclosure and distinctive historic character of London Street, East Street is characterised by recent object buildings designed to be contemporary but contextual. East Street is a modern street with no historic character or particular significance beyond its route.
- 7.5 The nature and appearance of East Street now detracts from the conservation area in two key ways. East Street contains the surface car park site that is the subject of the proposed application. Its appearance and condition

clearly detract from the conservation area. It, and the higher level surface car park to the west, adjacent to the listed buildings on London Street, are precisely the kind of unattractive modern feature that are inherently at odds with the historic character and appearance of conservation areas. The site is ugly and should be occupied by built form rather than being open. The open space of the site is an anomaly in urban terms. The exposed view of the rear parts of the listed buildings at 33 to 47 London Street and the Buildings of Townscape Merit at 1-4 London Court is, in our opinion, ahistorical, artificial and harmful. It detracts not just from the conservation area, but from the setting of the other heritage assets in question.

- 7.6 The general design approach of the proposed application is consistent with the modern character and appearance of East Street. The scale of the proposed application is respectful and the height of the building causes it to sit comfortably within the East Street streetscape. The proposal helps to reinstate missing urban form where it should exist, recreates a street edge where it is lacking, and helps to create a meaningful sense of enclosure for the 'hammerhead' at the northern end of East Street.
- 7.7 It is very questionable whether the rear parts of Nos 35-39 London Street should be considered as listed, given the evident lack of special architectural or historic interest to be found in those parts. The cottages to the rear of 39 London Street have sufficient local interest to merit inclusion in the conservation area and the brick block to the rear of 33 London Street obviously forms part of the historical interest of that building. Regardless of the inclusive legal definition of the extent of listing, a proper analysis of special interest in these listed buildings cannot sensibly allocate equal significance across the whole of their sites.
- 7.8 In broad terms the judgement regarding the effect of the proposed application on the external special interest of the listed buildings at 33-41 London Street should be of

the effect of the scheme on their main parts facing London Street. In that respect the effect is entirely positive. The proposed application would, without doubt, preserve their special architectural or historic interest.

- 7.9 For the reasons given above we agree with Orion Heritage (in its January 2017 report) regarding the minimal effect of the proposed application on Queens' Crescent and St Giles Church, and the scheme will therefore preserve the special interest of both these listed structures.
- 7.10 The same is true of the special interest of the conservation area. The proposed application is well-designed and will indisputably improve this part of the conservation area over its present condition. It therefore preserves and enhances the conservation area.
- 7.11 The conclusion of our assessment is that the proposed application at the East Street site will preserve the setting of listed buildings and preserve and enhance the character and appearance of the Market Place/London Street Conservation Area. The proposed application thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 7.12 We also believe that the proposed application is consistent with the urban design and heritage policies of the National Planning Policy Framework and Reading's Local Plan.
- 7.13 Finally, and very importantly, the proposed application is essentially the same as the scheme permitted on appeal. The minor amendments proposed make no significant difference in heritage and townscape terms. The design is essentially as permitted at appeal. The heritage and townscape effects of the proposed application are the same as those of the permitted scheme. The proposed application remains of an appropriate scale and design, and it preserves and enhances the conservation area and the setting of listed and unlisted buildings. The proposed application is, like the successful appeal scheme, of an appropriate scale and design, and it preserves and

enhances the conservation area and the setting of listed and unlisted buildings.

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