

East Lodge, Coley Avenue, Reading

Heritage Note: Proposed Outbuilding

REF: P17-0874 (HA)

DATE: 31 / 07 / 2017

Introduction

1. The following Heritage Note has been prepared by Pegasus Group on behalf of Mr Rambogin and Ms Congdon in relation to the proposed new outbuilding within the curtilage of the Grade II Listed East Lodge, Coley Avenue, Reading.
2. East Lodge dates to the early 19th century, and along with West Lodge, forms a pair of lodge houses historically associated with Coley Park House, located to the southwest. The Lodges are now located within a modern residential suburb, principally developed in the mid-late 19th century. Coley Park House (Grade II Listed) remains; however, it is now in use as a medical facility, in separate ownership to the Lodges.
3. The location of the proposed outbuilding is to the southwest of East Lodge, within the gardens associated with the property. This area currently includes a small shed; however, it is largely covered by lawn and a mature hedgerow boundary.
4. Proposals are for the construction of a new single storey outbuilding, constructed of timber cladding and large glass panels. To facilitate the construction of the new outbuilding, the existing small shed will be demolished and part of the existing hedgerow boundary removed. A new timber fence will be erected in the vicinity of the proposed outbuilding, similar in style to the existing and set behind the existing metal railings which are to be retained. The proposed outbuilding will not be physically attached to East Lodge, and will be located c.11m from the dwelling.
5. Neither the area of the proposed outbuilding, the Lodge houses nor Coley Park House are located within a Conservation Area.

Methodology

6. The following assessment has been informed by *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment*¹ (henceforth referred to as *GPA 2: Managing Significance*), *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage*

¹ Historic England, 2015, *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment*

*Assets*² (henceforth referred to as *GPA 3: The Setting of Heritage Assets*) and English Heritage's Conservation Principles.³

7. Full details as to the methodology utilised are appended to this Note (Appendix 1).

Planning Policy Context

8. The statutory requirement set out within the Planning (Listed Buildings and Conservations Areas) Act 1990, at Section 66(1) confirms that considerable weight should be given to the preservation of the historic and architectural interest of Listed Buildings and their settings. In addition, both the NPPF and Local Planning Policy states that development proposals should preserve or enhance the significance of heritage assets such as Listed Buildings and Conservation Areas, and therefore this needs to be the primary consideration when determining the proposed application.
9. Full details as to relevant planning policy is appended to this Note (Appendix 2).

East Lodge – Statement of Significance

10. The Grade II Listed East Lodge, alongside West Lodge, was added to the National Listed on 14th December 1978 with the following description:

"Early C19. Architect 13 A Alexander. 1½ storeys rendered. Matching lodges with hipped slate roofs. Facing fronts with plinths and string over ground floor. Projecting Doric portico (stone) and 6 panel door each. Flanking blind arched recesses. Central small arched window above with radiating glazing, gable over. Moulded wooden cornice continued up gable verges. On north front, string becomes impost mould to an arched glazing bar sash window in arched recess, cornice continued. Further set back extension. The Lodges are linked by cast-iron railings with low arrow head dog-rails. Panelled standards to gates, side gate by West Lodge."

11. A full copy of the Listing Description is appended to this Note (Appendix 3).
12. As set out within the Listing Description, East Lodge is largely classical in its architectural style, reflecting the architectural detail of the principal house to which they were historically connected (Coley Park House).
13. The principal elevation of the building is to the northwest, where it includes an ornate Doric portico facing, and mirroring, the principal elevation of the West Lodge. These two elevations face the former approach to Coley Park House (see below), which extended towards the Lodges and main house from the northeast.

² Historic England, 2015, *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*

³ English Heritage, 2008, *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

14. To the east and south of East Lodge are the associated enclosed garden areas, with the boundaries defined by mature vegetation and timber fencing. Such areas are of a modern, domestic character. Concerning such areas, there is little intelligibility of the garden areas from the wider surrounds of the asset, nor is visibility of the Lodges in conjunction with their rear garden areas considered to contribute to their overall experience and heritage significance.
15. In relation to the rear garden areas , a notably sized single storey outbuilding is located to the rear (northwest) of West Lodge. This structure is largely screened by the enclosed nature of the garden area associated with West Lodge, and does not impact upon the experience or appreciation of either West Lodge or the combined heritage significance of the pair.
16. The front garden areas (to the north-east) of both East and West Lodge are considered to make a greater contribution to the experience and heritage significance of the assets, forming a suitable green buffer which emphasises the group value of the pair and provides an understanding as to their historic function and development independent of the modern residential surrounds.
17. Based upon a review of historic cartographic sources, the current boundary of the plot associated with East Lodge was established in during the 1960s / 1970s, primarily as a result of the construction of the residential dwellings and associated garages to the southeast. Prior to this date, and historically, the associated garden area was much smaller and only included land to the immediate south-east and south-west of the asset. The area further to southwest which is now occupied by the modern shed, and the location of the proposed outbuilding, does therefore not appear to have formed part of the garden areas originally associated with East Lodge.
18. Originally the two Lodges would have been designed to be identical in their form and appearance. The overall composition of East Lodge remains largely unaltered; however, West Lodge has been extended to the north-west via the construction of a modern conservatory (Planning Refs: 111632 and 111633). This has resulted in a distortion in the identical plan form of the two Lodges, although as a result of the positioning and scale of the conservatory it is not visible from the main approach to the Lodges from the north-west nor does it impact upon their combined appreciation.



Plate 1: East Lodge as seen from the northeast.



Plate 2: South and east elevations of East Lodge as seen within the garden areas to the southeast.

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Plate 3: View of the rear garden areas of East Lodge as seen from the land between the two Lodges to the northwest.



Plate 4: Location of the proposed outbuilding as seen from the north.

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19. East Lodge is positioned on the south-eastern side of Coley Avenue, with West Lodge positioned to the northwest. The two Lodges are linked by a set of railings; however, they are now in separate ownership. Coley Avenue roughly follows the alignment of the former main approach to Coley Park House from the north-east, although it is now extremely modern in character forming part of the surrounding modern residential area.
20. The residential suburb within which the Lodges are located was established on the former parkland and estate land of Coley Park House during the mid-late 20th century, and now defines the character of this area. There is minimal intelligibility of the former designed parkland in this location beyond the presence of the Lodges (and to a degree the alignment of Coley Avenue). Such residential development has thus resulted in the removal of the contribution that such areas make to the overall heritage significance of the Lodges and Coley Park House.
21. Coley Park House is located c.250m to the southwest of the Lodges. Intervening land would historically have formed part of the designed parkland of House; however, this has now been substantially changed by previous and ongoing modern development and is no longer intelligible. Any visibility which may have once existed between the Lodges and the House has now been removed, as has their historic associative and functional connections. Within the current context, there is negligible intelligibility of the former relationship.
22. The Lodges are now seen set amongst surrounding modern development, and are seen in conjunction with such modern built form (see Plates 1 3). There are no views obtainable which show the Lodges without modern built form being visible.



Plate 5: Aerial photograph of East Lodge and its surrounds. Note that the area in purple is currently being redeveloped.



Plate 6: View northeast from the area of the proposed outbuildings towards current construction area.



Plate 7: View of West Lodge as seen from the current construction area to the south east.

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Plate 8: View west across the current construction works to the west of the Lodges.

23. The heritage significance of East Lodge is primarily derived from the evidential and historic value of the physical fabric of the building, and the contribution that this makes to the overall architectural and historic interest of the asset as one half of a pair of early 19th century lodge houses.
24. The setting of the asset also contributes to its heritage significance. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its overall heritage significance comprise:
 - The interrelationship between both East and West Lodge, and the former main approach to Coley Park House;
 - The combined experience of the two Lodges, and the appreciation of their architectural detail and grouping as a main entrance to the former Coley Park House parkland; and
 - The negligible intelligibility of the Lodges and their former connection with Coley Park House.
25. Within this context, the contribution made by the rear garden areas of both Lodges to the overall heritage significance of the assets is considered to be negligible, *de minimis*. Such contribution is further reduced with regard to the location of the

proposed outbuilding as it does not form part of the historic garden plot of East Lodge.

26. Visibility of the location of the proposed outbuilding from within the wider surrounds is extremely limited, screened by mature vegetation and modern fencing. It does not form part of the surrounds of the asset which contributes to the experience and appreciation of the architectural detail of the asset, its relationship with West Lodge or Coley Park House.
27. In addition, as discussed above, West Lodge includes a substantially outbuilding to the rear which does not impact upon the experience or appreciation of either assets.

Impact Assessment

28. As set out previously, the proposals are for the construction of a single storey outbuilding constructed of timber cladding and large glass panels. To facilitate the construction of the new outbuilding, the existing small shed will be demolished and part of the existing hedgerow boundary removed. A new timber fence will also be erected in the vicinity of the proposed outbuilding, similar in style to the existing and set behind the existing metal railings which are to be retained. The proposed outbuilding will not be physically attached to East Lodge, and will be located c.11m from the dwelling.
29. The proposed appearance of the new outbuilding in conjunction with the north elevation of East Lodge and both existing and proposed boundary treatments is shown at Plate 9. This is an extract from Dwg No: DPA150_07 which forms part of the wider application documentation.

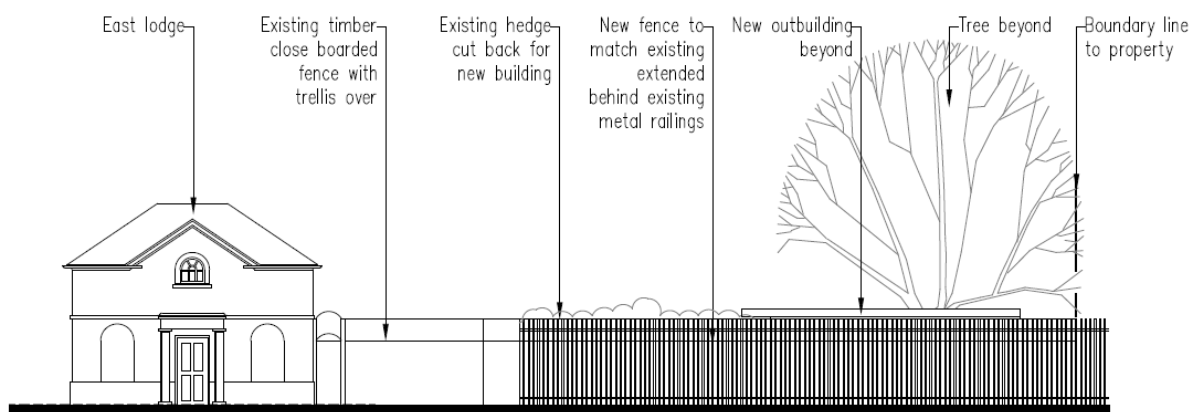


Plate 9: Proposed outbuilding as seen from the north.

30. The proposed outbuilding would not be physically attached to the East Lodge, with any boundary treatment alterations also be located away from the asset. As such, the proposal will not result in any physical impacts to East Lodge.

31. The proposed outbuilding is not located within an area of the surrounds of the asset which are considered to make an appreciable contribution to the overall heritage significance of East Lodge. Indeed, the area of the proposed outbuilding was not incorporated into the wider gardens associate with the asset until the mid-late 20th century.
32. By nature of the size, design and siting of the proposed outbuilding, the structure will not appear dominant in relation to East Lodge, and will be intelligible as a separate and subservient ancillary building.
33. The proposed outbuilding will not alter the experience or appreciation of the asset from within its immediate surrounds, nor the combined experience of the two Lodges as seen from Coley Avenue. Indeed, the proposed outbuilding will not be visible when approaching the Lodges from Coley Avenue.
34. As such, based upon the limited contribution made the location of the proposed outbuilding to the overall heritage significance of East Lodge, and the sympathetic design of the proposed structure, it is not considered that its construction will result in a change that will cause harm to the overall architectural and historic interest of either East or West Lodge via a change in setting.
35. Proposals therefore comply with the obligations of the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and the local Development Plan.
36. Therefore, notwithstanding the considerable importance and weight attributed to the presumption in favour of the preservation of the architectural and historic interest of the Listed Building, the proposal should be supported and permission granted, as per the requirements of paragraphs 186 and 187 which state that:

"Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development...Local authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."

Appendix 1 – Methodology

Assessment of Significance

In the NPPF, heritage significance is defined 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."

Articulating Value

*Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment*⁴ (henceforth referred to as 'GPA 2: Managing Significance') gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset. In order to do this GPA 2: Managing Significance also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's Conservation Principles⁵: aesthetic, communal, historic and evidential. These essentially cover the heritage 'interests' given in the glossary of the NPPF, which comprise archaeological, architectural artistic and historic interest.

Conservation Principles provides further information on the heritage values it identifies:

- Evidential value: the potential of a place to yield evidence about past human activity. This value is derived from physical remains, such as archaeological remains, and genetic lines.
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present - it tends to be illustrative or associative. Illustrative is the perception of a place as a link between past and present people and depends on visibility. It has the power to aid interpretation of the past through making connections with and providing insights into past communities and their activities through shared experience of a place. By contrast, associative value need not necessarily be legible at an asset. But gives a particular resonance through association with a notable family, person, event or movement.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of conscious design or fortuitous outcome or a combination of the two aspects. The latter can result from the enhancement of the appearance of a place through the passage of time.
- 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. This can be through widely

⁴ Historic England, 2015, *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment*

⁵ English Heritage 2008 *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment*

acknowledged commemorative or symbolic value that reflects the meaning of the place, or through more informal social value as a source of identity, distinctiveness, social interaction and coherence. Spiritual value may also be part of communal value.

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

These four values essentially cover the heritage 'interests' given in the glossary of the NPPF, which comprise archaeological, architectural, artistic and historic interest. Listed Buildings and Conservation Areas are designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and Significance

As defined in the NPPF:

*"Significance derives not only from a heritage asset's physical presence, but also from its setting."*⁶

Setting is defined as:

*"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may contribute to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."*⁷

Therefore, setting can contribute to, detract from or be neutral with regards to heritage values, and so change to setting has the potential to diminish, enhance or leave unchanged the significance of a heritage asset through change to the value(s).

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this report with reference to Historic England's 2015 document *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (henceforth *GPA 3: The Setting of Heritage Assets*), particularly the checklist given on page 9. *GPA 3: The Setting of Heritage Assets* advocates the clear articulation of "what matters and why".

In *GPA 3: The Setting of Heritage Assets*, a stepped approach is recommended, of which Step 1 is to identify the heritage assets affected and their settings. Step 2 is to assess "whether, how and to what degree settings make a contribution to the significance of the heritage asset(s)". The guidance includes a (non-exhaustive) check-list of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, land use, green space, functional relationships, degree of change over time and integrity. It also lists

⁶ NPPF, Annex 2

⁷ Ibid.

points associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquility, sense of enclosure, accessibility, rarity and associative relationships.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is 'maximising enhancement and minimising harm'. Step 5 is 'Making and documenting the decision and monitoring outcomes'.

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

Levels of Significance

In accordance with the level of significance articulated in the NPPF, four levels of significance are identified:

- Designated heritage assets of the highest significance, as identified in paragraph 132 of the NPPF comprising Grade I and II* Listed buildings; Grade I and II* Registered Parks and Gardens; Scheduled Monuments; Protected Wreck Sites and Registered Battlefields (and also including some Conservation Areas);
- Designated heritage assets of less than the highest significance, as identified in paragraph 132 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);
- Non-designated heritage assets;
- Sites, buildings or areas of no heritage significance.

Assessment of Harm

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

As part of this, setting may be a consideration. For an evaluation of any harm to significance through changes to setting, this assessment follows the methodology given in Historic England's 2015 document *GPA 3: The Setting of Heritage Assets*, of which steps 1 and 2 are described above. Again, fundamental to the methodology set out in this document is stating "what matters and why", with particular reference made to the aforementioned checklist.

It should be noted that this key document states that:

"setting is not a heritage asset, nor a heritage designation"

Hence any impacts are described in terms of how they affect the significance of a heritage asset itself through changes to setting.

In order to relate to key policy, the following levels of harm may potentially be identified:

- Substantial harm or total loss. It has been clarified in a High Court Judgement of 2013⁸ that this would be harm that would 'have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced';
- Less than substantial harm. Harm of a lesser level than that defined above; and
- No harm (preservation). A High Court Judgement of 2014 is relevant to this⁹, in which it was held that with regard to preserving the setting of Listed building or preserving the character and appearance of a Conservation Area, preserving means doing no harm.

Preservation does not mean no change; it specifically means no harm. GPA 2: Managing Significance it states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*". Thus change is accepted in Historic England's guidance as part of the evolution of the landscape and environment, it is whether such change is natural, harmful or beneficial to the significance of an asset that matters.

With regards to changes in setting, GPA 3: *The Setting of Heritage Assets* states that "*protection of the setting of heritage assets need not prevent change*", with the above statement regarding the natural, harmful or beneficial impact on the significance being key.

Benefits

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

⁸ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council

⁹ EWHC 1895, R (Forge Field Society, Barraud and Rees) v. Sevenoaks DC, West Kent Housing Association and Viscount De L'Isle.

Appendix 2 – Planning Policy

The National Planning Policy Framework

National policy and guidance is set out in the Government's National Planning Policy Framework (NPPF) published in March 2012.

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

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

The purpose of the planning system is to contribute to the achievement of sustainable development and the NPPF sets out three 'dimensions' to sustainable development: an economic role, a social role, and an environmental role. The presumption is key to delivering these ambitions, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the NPPF.

The NPPF also sets out 12 no. core planning principles for delivering sustainable development. For the purposes of this Statement, particular regard should be had to the tenth core principle, which identifies at paragraph 17 of the NPPF that planning should:

"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations"

Heritage Assets are defined in Annex 2 of the NPPF (page 52) as:

"A building, monument, site, place, area or landscape meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the Local Planning Authority (including Local Listing)"

Significance is also defined (page 56) 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"

Section 12 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 129 that:

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

Paragraph 131 goes on to state that:

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

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to 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"*

With regard to the impact of proposals on the significance of a heritage asset, paragraph 132 is relevant and reads as follows:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alterations or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites should be wholly exceptional"*

In the context of the above, it should be noted that paragraph 133 reads as follows:

"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or 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"*

Paragraph 134 goes on to state:

"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 securing its optimum viable use"

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 137 that:

"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably"

Paragraph 138 goes on to recognise that *"not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance"* and with regard to the potential harm from a proposed development states:

"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 as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, 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" (our emphasis)

As set within this Heritage Note, it can be demonstrated that the proposals would serve to preserve the historic and architectural interest of No. 82 High Street and the character and

appearance of the Lewes Conservation Area and thus Advisement Consent should be granted as per the requirements of paragraphs 186 and 187 which state that:

"Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development...Local authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."

National Planning Guidance

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

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

The NPPG has a discrete section on the subject of 'Conserving and enhancing the historic environment' which a paragraph 009 (ID: 18a-009/20140306 revision date 06.03.2014) confirms that the consideration of 'significance' in decision taking is important and states:

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

In terms of assessment of substantial harm, paragraph 017 (ID: 18a-017-20140306 revision date 06.03.2014) confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

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

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale

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are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm" (our emphasis)

With regard to design the NPPG states at paragraph 02 (ID: 26-002-20140306 revision date 06.03.2014) that:

"Good design should:

- ensure that development can deliver a wide range of planning objectives*
- enhance the quality of buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well being*
- address the need for different uses sympathetically."*

Paragraph 23 (ID: 26/023/20140306 revision date 06.03.2014) goes on to explain how to consider buildings and the spaces between them and reads as follows:

"Plans, policies and decisions can effectively manage physical form at a variety of scales. This is how planning can help achieve good design and connected objectives. Where appropriate the following should be considered:

- layout – the way in which buildings and spaces relate to each other*
- form – the shape of buildings*
- scale – the size of buildings*
- detailing – the important smaller elements of buildings and spaces*
- materials – what a building is made from"*

Local Planning Policy

Local policies relating to the protection of the historic environment are contained within the adopted Core Strategy (2008) and additional guidance within the Sites and Detailed Policies DPD which was adopted in 2012. Policy CS33 of the Core Strategy sets out the Council's strategic guidance in relation to the historic environment which states:

"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: -

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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."

Local Plan Policies with regards to the NPPF and the 1990 Act

It is however important to note that regarding Local Plan policies paragraph 215 of the NPPF states that:

"due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)".

Where local plan policy does not allow for the weighing of harm against public benefit for designated heritage assets (see NPPF paragraph 134) or a balanced judgement with regards to harm to a non-designated heritage asset (see NPPF paragraph 135) then policies are considered to be overly restrictive compared to the NPPF, limiting the weight they may be given.

Whilst Policy CS33 of the Core Strategy is of direct relevance, given that the policy was adopted prior to the inception of the NPPF, the weight which can be attributed to them will be determined by their consistency with the policy guidance set out within the NPPF. Since the above Policy does not allow for the balancing exercise to be undertaken, the policy is not considered to reflect the guidance within the NPPF and therefore considered to be out of date. Thus the weight which can be attached to it in the decision making process is limited.

This view has been accepted by a number of Appeal Inspectors and also ratified by the Secretary of State in their consideration of the Appeal by Gallagher Estates Ltd at Land South of Gallows Hill/West of Europa Way, Warwick (PINS ref: APP/T3725/A/14/2229398).

Appendix 3 – Listing Description



Historic England

EAST AND WEST LODGES AT COLEY PARK

List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Name: EAST AND WEST LODGES AT COLEY PARK

List entry Number: 1155076

Location

EAST AND WEST LODGES AT COLEY PARK, COLEY AVENUE

The building may lie within the boundary of more than one authority.

County:

District: Reading

District Type: Unitary Authority

Parish:

National Park: Not applicable to this List entry.

Grade: II

Date first listed: 14-Dec-1978

Date of most recent amendment: Not applicable to this List entry.

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: LBS

UID: 38885

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Building

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

History

Legacy Record - This information may be included in the List Entry Details.

Details

COLEY AVENUE 1. 5128 East and West Lodges at Coley Park SU 7072 13/304 II
2. Early C19. Architect 13 A Alexander. 1½ storeys rendered. Matching lodges with hipped slate roofs. Facing fronts with plinths and string over ground floor. Projecting Doric portico (stone) and 6 panel door each. Flanking blind arched recesses. Central small arched window above with radiating glazing, gable over. Moulded wooden cornice continued up gable verges. On north front, string becomes impost mould to an arched glazing bar sash window in arched recess, cornice continued. Further set back extension. The Lodges are linked by cast-iron railings with low arrow head dog-rails. Panelled standards

to gates, side gate by West Lodge.

Listing NGR: SU7052072355

Selected Sources

Legacy Record - This information may be included in the List Entry Details

National Grid Reference: SU 70520 72355

Map



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The above map is for quick reference purposes only and may not be to scale.

For a copy of the full scale map, please see the attached PDF - [1155076 .pdf](http://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/146120/HLE_A4L_Grade|HLE_A3L_Grade.pdf)
(http://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/146120/HLE_A4L_Grade|HLE_A3L_Grade.pdf)

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

This copy shows the entry on 23-Jul-2017 at 06:33:34.

End of official listing