

**HERITAGE STATEMENT –  
DEMOLITION OF 7 BLAGRAVE  
STREET AND ERECTION OF A  
REPLACEMENT BUILDING**

Prepared For

**MR M. BHATTI**

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**Bell Cornwell**

**CHARTERED TOWN PLANNERS**

Bell Cornwell LLP  
Oakview House, Station Road,  
Hook, Hampshire RG27 9TP  
T : 01256 766673 F : 01256 768490

*Also at*  
Sowton Business Centre, Capital Court,  
Bittern Road, Exeter, Devon EX2 7FW  
T : 01392 357515 F : 01392 268167

St Mary's Court, The Broadway,  
Amersham, Buckinghamshire HP7 0UT  
T : 01494 618444 F : 01494 582020

**[bcp@bell-cornwell.co.uk](mailto:bcp@bell-cornwell.co.uk)**  
**[www.bell-cornwell.co.uk](http://www.bell-cornwell.co.uk)**

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## **1 INTRODUCTION**

- 1.1 This Heritage Statement is prepared as part of the evidence base of submissions in support of an application for the demolition of the existing building at 7 Blagrove Street, Reading, and the erection of a replacement 6 storey building. The existing building has an A3 use at ground floor level and a B and B, guest accommodation (C1) on the upper floors. This application does not seek to alter the prevailing uses on the site. The building is not a statutory listed building but is located within the Market Place/London Street Conservation Area.
- 1.2 This statement will consider the Heritage implications of the proposed development and explain how the proposed development is acceptable in the heritage context working with the heritage assets on the site rather than conflicting with them.

## **2 LEGAL CONTEXT, PLANNING GUIDANCE AND DEVELOPMENT PLAN REQUIREMENTS**

- 2.1 The National Planning Policy Framework (NPPF) explains that defines a Heritage Asset as *"a building....identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated Heritage Assets (definition provided elsewhere in NPPF) and assets identified by the Local Planning Authority (including local listing)".* A site within a conservation area satisfies the criteria of being a heritage asset.
- 2.2 The application site falls within the defined Market Street/London Street conservation area. Conservation areas are designated under the provisions of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. A conservation area is defined as *"an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance".*
- 2.3 Section 71 of the same Act requires local planning authorities to formulate and publish proposals for the preservation and enhancement of these conservation areas. Section 72 also specifies that, in making a decision on an application for development within a conservation area, special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 2.4 In response to these statutory requirements, the Council has prepared a conservation area appraisal statement that records the special architectural and historic interest of the conservation area and identifies opportunities for enhancement. It is in conformity with English Heritage guidance as set out in *"Guidance on conservation area appraisals"* (August 2005) and *"Guidance on the management of conservation areas"* (August 2005).
- 2.5 The key consideration for the proposed development (in heritage terms) is the impact on the character and appearance of the conservation area. These requirements are explained in paragraph 131 of the NPPF which explains 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.*

2.6 There is a balance between the preservation of heritage assets and the need to accept that change is inevitable. Paragraph 132 of the NPPF continues that *"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 alteration 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"*.

2.7 In terms of the question of whether the development preserves or enhances, the courts have found that, as long a development does not result in a material harm to the character of appearance of the conservation area then it satisfies its requirement of preservation. New building are frequently approved in conservation areas. They don't need to result in harm, especially where the building to be replaced is not of any great importance.

2.8 Policy CS33 of the Reading Borough Core Strategy sets out the development plan requirements for the protection and enhancement of the Historic Environment. It states that *"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:*

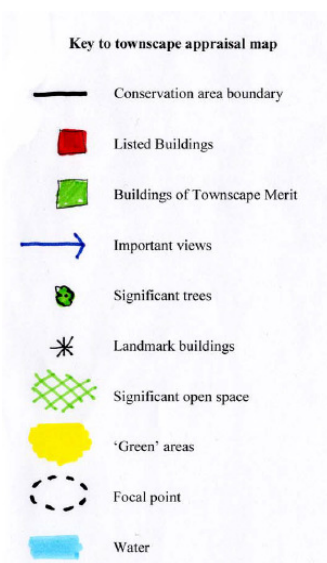
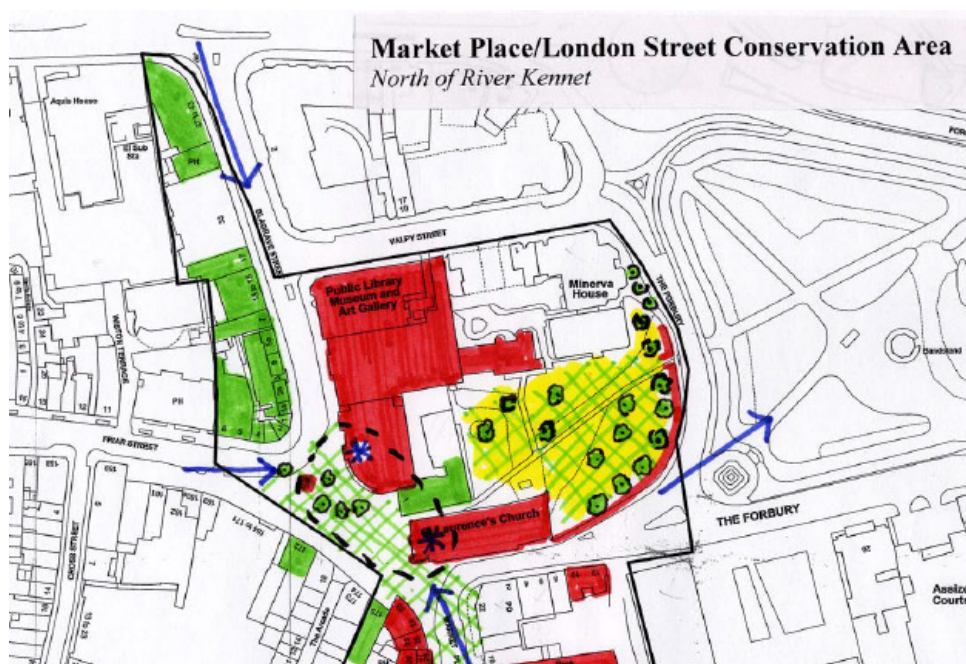
- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

*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”*

- 2.9 This policy is entirely consistent with the legal requirements for a conservation area and the decision maker’s tests set out in the NPPF.

### 3 CONSERVATION AREA ASSESSMENT

3.1 The first consideration of the NPPF test for the decision maker, set out in paragraph 131, is the level of harm that results, if indeed there is any harm. To influence this judgement, the Council's Conservation Area Appraisal for the conservation area explains the importance of this part of the Conservation Area and would also, if there were any, set out the importance of the building itself.



- 3.2 The property does not feature on the plan above as a building of any importance (listed or locally listed) other than the annotation of being of "Townscape Merit". This is very much a third tier of importance behind listed buildings and locally listed buildings. It is an identification made from the ground of buildings in which the property is located and the contribution that they make, rather than any significant contribution of its own.
- 3.3 Furthermore, the Conservation Area appraisal in more general terms states that "There are good views of the Town Hall and Concert Hall from Friar Street, Blagrove Street and Market Place." The site is within Area 4 of the Market Place/London Street Conservation area. There is no specific reference to the building in the text.
- 3.4 The development plan sets out a list of criteria for locally listing buildings and structures and specifically excludes buildings and structures when they are already part of a Conservation Area, Scheduled Monument, or subject to an Article 4 direction relating to historical or architectural interest. There is thus no requirement for a further assessment of whether the building should be on a local list. It is, however, noteworthy that the definition in this section of "Townscape Value" is that the *buildings/structures have prominence and a landmark quality that is fundamental to the sense of place of a particular locality.*
- 3.5 From the Conservation Area appraisal it is therefore reasonable to assume that the application building is not of significant historic importance in its own right and therefore, using the tests of paragraph 132 of the NPPF, we can conclude that the amount of weight given to the asset's conservation should be limited. Similarly, the surrounding buildings are of no greater historic importance either, being subject only to the same "townscape" identification in the Conservation Area Appraisal, and important consideration in assessing the last requirement of policy CS33 above which states that "*Planning permission will only be granted where development has no adverse impact on historic assets and their settings.*"
- 3.6 It is therefore reasonable to conclude that the demolition of the existing building would leave a harmful hole in the townscape which would be harmful to the character of the conservation area, but this is because of the resulting gap in the

townscape rather than because of the loss of an important, historic building. The test of harm (or lack of harm) therefore depends on the replacement building as a direct comparison between the existing and the proposed building. To do this, further assessment of the existing building is first required.

### **Existing building**

3.7 It is immediately noticeable from the street scene photographs below that the existing building does not have the grandeur of even its two neighbours, which are both subject to no greater protection than the application property. Whilst the facades remain from their original forms, the facades of both flanking buildings and the application property mask an otherwise un-noteworthy rear part of the building. In other words, the frontage façade is the heritage asset.





- 3.8 As can be seen on photo 2 below, the frontage on neighbouring 9-15 Blagrove Street masks essentially a new building to the rear, a utilitarian building which was originally offices but has recently converted to flats.
- 3.9 In considering the frontage, again, it is important to consider the detail. The attractiveness of the application property derives from the 'shop' front, the bay window and the gable. However, on closer inspection, the bay window is characterised by modern glass, 1970s ventilation glass and, in some cases, no glass at all. Internally, the lack of insulation (noise and heat) provided by this window is compensated for by a second layer of fenestration internally. The windows themselves are rotten, cracked and generally in a poor state of repair both internally and externally as demonstrated by the internal photo 3 below and then externally in photo 4.



3.10 The render on the gable masks a considerable damp problem, as can be seen from the photograph below and this detracts from the quality of the façade of the building overall.



3.11 At ground level is the shop front, characterised again by the historic detailing with a more modern frontage behind it and dominated by the canopy (again, which is in a poor state of repair). Whilst the external parts of the ground floor frontage (the flanking columns for example) clearly retain some historic fabric, all this is lost beyond the façade.



3.12 In terms of the details of the frontage, therefore, the character is provided by the built form of the gable, the bay window and the pillars which flank the shop front. Notwithstanding the current state of repair these are currently in, the design approach seeks to retain/replicate these feature and renovate them. Whilst the application is submitted as an application for a replacement building, this does not prevent the retention of parts of the frontage. It is therefore proposed to retain the flanking pillars and the bay window in their current position. The gable will be *pulled* upwards to a similar height found on the historic fronts (this is justified in the planning statement as it is not an historic consideration) of the flanking properties but the detailing of the parapet will remain. All historic features will be renovated.

3.13 Returning to the legal tests and the NPPF, the building itself is not significant and therefore there is no harm from the loss of the building. The historic interest of

the building is provided by the details (pillars, bay window and gable end), all of which are retained as part of the proposed and renovated – passing both legal tests of preservation and enhancement even though there is no legal requirement to satisfy both at the same time.

## **Harm**

3.14 Whilst this report concludes that no harm would result from the proposal, it is prudent to consider a scenario where the Council disagrees with this conclusion. So, what if the Council disagrees with these conclusions and considers that the proposal would result in harm? The first judgement for them to make is the significance of the harm. Given that “significant” harm refers to the loss of heritage assets “of the highest significance” (para. 132 NPPF), it is reasonable to conclude that this should only refer to listed buildings and the occasional locally listed building rather than just a building in a conservation area. The proposal must therefore be considered resulting in “less than substantial harm” (para. 134 NPPF).

3.15 In the case of a proposal resulting in “less than substantial harm” the decision maker must, according to paragraph 134 of the NPPF, weigh the harm against the public benefit of the proposal, including securing its optimum viable use. This balance should include a consideration of the first 2 tests of para. 131 of the NPPF which are detailed above (the third test refers to the visual impact and distinctiveness against which the proposal must be balanced):

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation* – The existing premises provides a positive service but the 6 bed and breakfast rooms, having to be run like a hotel, does not provide the level of activity and turnover to make it a profitable part of the business. The uplift in rooms and the improvement to the accommodation proposed will provide the economy of scale needed to make a profitable long term business. There is need for the additional accommodation in central Reading, being residential or guest accommodation and there remains the emphasis of making best use of all available land. As demonstrated above, the façade of the building is falling into disrepair due to the current use, a more viable use will inevitably result in an improvement in the

maintenance of the building. Regardless of the view taken on the overall visual impact of the scheme on the conservation area, the proposal incorporates the elements of the building that are worthy of retention or restoration which aids this assessment of balance.

- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality* – Whilst somewhat outdated in its references, para. 8.3 of the Reading Core Strategy offers an insight into the importance of the town centre economy in stating that “Policies on retail, leisure and culture have been framed within the context of national, regional and local policy. PPS6 provides the main national planning context for these uses, alongside PPG13. The draft South East Plan gives a regional focus to policy, particularly the Town Centres and Tourism sections. The Community Strategy provides the overall context for the Borough, within which strategies such as the City Centre Strategy and Action Plan operate.” This is reflected in policy CS25 of the Core Strategy which states that “**Major retail and main town centre leisure and culture development will take place in, or as an extension to, the centre of Reading.**” The additional accommodation proposed will aid the night time economy of the town centre, helping to sustain the range of leisure and culture in the town and attracting new people into the town.

3.16 The benefits of the proposal therefore outweigh any harm that the Council could reasonably conclude as resulting from the proposal. We maintain that there will be no harm and that the proposal passes the legal tests of preserving or enhancing the conservation area.

## CONCLUSION

- 3.17 The proposed development has been designed to respect the Heritage Assets of the Conservation Area. The location of the proposed building ensures that there is no development on land which directly relates to the listed buildings or locally listed building. The assessment must therefore, in heritage terms, be an assessment of the townscape.
- 3.18 The character of the conservation area is residential with a mixture of building uses, designs, heights etc. The proposed development will increase the height of a building which is currently out of character (in terms of height) with its two neighbouring buildings. The heritage benefits of the building can be derived from its façade and the historic intricacies that can be seen, albeit in their current dilapidated form. The proposal will retain these feature and renovate them as an improvement to the building, restoring a level of historic pride.
- 3.19 There will therefore be no material harm to the character of the Conservation Area and there is no reason to use this Heritage Assets as a reason to resist the development.