

PLANNING, HERITAGE, DESIGN AND ACCESS STATEMENT

**FOR THE PROPOSED CHANGE OF USE FROM B1 OFFICE TO D2 LEISURE AND INTERNAL
ALTERATIONS TO THE BUILDING**

**WESTMINSTER HOUSE
58 LONDON STREET, READING**

Reference: BNL.0790

Date: November 2015

Pegasus Group

Abbey House | Grenville Place | Bracknell | RG12 1BP

T 01344 207777 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | London | Manchester

Planning | Environmental | Retail | Urban Design | Renewables | Landscape Design | Graphic Design | Consultation | Sustainability

© Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	SITE DESCRIPTION	2
3.	PROPOSAL	7
4.	ASSESSMENT AGAINST PLANNING POLICY AND GUIDANCE	8
5.	HERITAGE POLICY ASSESSMENT	13
6.	CONCLUSION	23

1. INTRODUCTION

- 1.1 This statement is produced to support a planning and listed building application for the change of use and internal alteration of Westminster House, 58 London Street, Reading, RG1 5SQ.
- 1.2 This planning statement will cover the background to the application and provide the necessary information to enable its determination by officers at the Council. It will describe the site and surrounding area, explain the operation of the proposed use and introduce the planning policies relevant to the proposal, concluding that local and national planning policies support the granting of permission.
- 1.3 In addition to this statement, the application is accompanied by the appropriate planning and listed building application forms, appropriate fee, and the following plans:
- Site Location and Block Plan
 - Existing and proposed floor Plans
- 1.4 Payment of £385 which forms the relevant planning application fee will be sent to the Council under separate cover.

2. SITE DESCRIPTION

- 2.1 The application site is located at Westminster House, 58 London Street within the central Reading area and within close walking distance to the town centre. The site is located to the south of the town centre and is surrounded by a variety of retail and leisure uses. The site has previously been used as B1(a) Office although the most recent tenant has now vacated.
- 2.2 Westminster House is a three storey mid-terrace Grade II Listed Building constructed of facing red brick and fronts directly on to London Street (see Plate 1). The site is located within the Market Place/London Street Conservation Area and has a parking area with access to the rear (see Plate 2).



Plate 1: Westminster House, front elevation. (No. 58, Westminster house is shown to the left of the image)



Plate 2: 54-58 London Street, rear elevation

- 2.3 The property, along with its neighbours at numbers 54 and 56 London Street, was first Listed as being of historic and architectural significance on 22nd March 1975 with the following List description:

“1753/4. 3 storeys, attic and basement. Brick, brick strings between floors (painted on 2nd floor). Brick dentil and moulded cornice. Parapet. No 54 has mansard slate front slope, rest and Nos 56 and 58 are old tile roof. One dormer. Each house has 3 windows, glazing bar sashes, 1st floor windows have late C18 cast-iron balconies of intersecting arch pattern. Nos 54 and 56 each have one door and modern shop window. Inside No 56 on ground floor is a reeded marble fireplace and a wide panelled hall with arch. No 58 has 2 windows (lacking glazing bars) and one door. Doors have moulded architrave surround and moulded cornice supported on consoles; Nos 56 and 58 have 6 panel doors. Cast-iron spearhead rails with patterned standards. More dormers and occasional grey brick to rear.”

- 2.4 A full copy of the List Description is provided at Appendix 1.
- 2.5 Whilst the List Description provides a detailed review of the external appearance of the building, it is clear that significant alterations have occurred to the property since the description was written in 1975, including the replacement of the modern shop window at number 56 and the apparent reroofing of number 54.

- 2.6 Internally, number 58 (Westminster House) has been extensively remodelled and modernised, with all floors, including the attic being converted to office use. Lavatories have been installed on the first and second floors, and there is a modern kitchen on the first floor. The staircase which serves the rear of the property appears to be a modern insertion, and there is very little remaining which is of historic interest as the property has been fully modernised in association with its former office use. A large chimney breast runs through the centre of the unit, although all fireplaces are now blocked and modern fire surrounds have been installed on the ground floor. Similarly to the description of the interior of number 56, the ground floor hall is wide with an arch detail, and the rooms at the front and back of the property have retained their original proportions, although a walk in cupboard has been crudely installed in the front room on the second floor.



Plate 3: Arch in ground floor hall



Plate 4: Staircase



Plate 5: Ground Floor blocked modern fireplace

2.7 The London Street/Market Place Conservation Area was first designated in 1972 and extended in 1982. The Conservation Area covers a large area. The Conservation Area Appraisal summarises the special interest of the Conservation Area as follows:

- **“Linear conservation area beside the planned medieval southern approach road, over the River Kennet, to a market place and church outside one of Reading Abbey’s gateways;**
- **The Hospitium of St John the Baptist, founded in 1189 (Scheduled Monument);**
- **Two of Reading’s three medieval churches: St Laurence’s and St Giles’, both with well treed churchyards;**
- **Isolated examples of timber-framed 16th and 17th century buildings e.g. nos 26 / 27 Market Place, nos 49 / 53 London Street and nos 3 / 5 London Road;**
- **Good examples of prestigious Georgian town houses in London Street;**
- **The fine collection of 19th century municipal buildings in Blagrove Street including Waterhouse’s distinctive Town Hall and Victoria Hall, Concert Hall and Museum, Library and Art Gallery;**

- **Groups of historic building around Market Place;**
- **Special historic and architectural focus around St Laurence's Church and the Town Hall complex;**
- **Many examples of building with bricks (red, blue and buff) from Reading's extensive local brickworks; Fine examples of 19th century banks and commercial buildings notably Barclays Bank, King Street and NatWest Bank, Market Place;**
- **Three green open spaces namely the churchyards of St Laurence's and St Giles' and the burial ground of the Friends Meeting House;**
- **Public open space (part-pedestrianised) composed of Market Place and Town Hall Square i.e. the area around the statue of Queen Victoria;**
- **Jacksons Corner, a once busy crossroads and locally known landmark;**
- **Trees in the public realm particularly street trees in London Street, Market Place and Town Hall Square;**
- **Tranquil atmosphere of Church Street;**
- **The presence of the River Kennet and a short visible length of Holy Brook;**
- **Lengths of natural stone kerb and historic paving in the courtyard of The George Hotel, Thorn Lane and alleys off London Street;**
- **Two examples of 19th century monuments: Sir John Soane's Simeon Monument and the Queen Victoria statue."**

3. PROPOSAL

- 3.1 The proposal is for the change of use of the building from a B1a Office to D2 leisure use, forming an 'escape room' experience. This concept involves teams of between 2 and 7 people being locked in a room; needing to use deduction and quick wit to solve puzzles, mysteries and break codes to escape within the set time period. At the time of writing 'Escape Game' experiences were ranked 25 out of 1276 'things to do in London' on TripAdvisor. The applicant 'Escape Plan Ltd' has experience of operating escape game experiences and is currently piloting a successful operation in London.
- 3.2 Live Escape Games (also referred to as 'Exit Games') are a fairly new and popular market sector in the leisure industry. It is considered that they provide a similar activity set that customers seek in their leisure time such as Live Events, Theatre, Cinema, Paintballing, Airsoft, and LaserQuest albeit operate at a lower intensity of use. Additionally, Exit Games operate in the corporate marketplace for team building events.
- 3.3 The Building will be laid out to provide two waiting rooms on the ground floor, with 1 experience on each of the upper floors operating across 2 rooms per experience. Each experience will be host to a maximum of 7 participants per session. Sessions will be a maximum of 90 minutes long, comprising 45-75 minutes playing time and a briefing and debrief session. The typical experience will commence with a short briefing by members of staff on the scope and rules of the game and acceptable conduct during the session. Participants are monitored throughout the session by CCTV, and will be in regular communication with staff. Each experience will be fitted with CCTV cameras and speakers.
- 3.4 The proposed change of use will primarily involve internal changes only with three new door openings proposed to facilitate effective game play and the heritage impacts of this proposal are discussed in more detail throughout this statement. Signage for the use will be limited to the installation of a plaque at the front and rear entrance of the site on the existing mountings.
- 3.5 To the rear of the site are 5 car parking spaces, which will be unassigned between patrons and staff to allow maximum flexibility. Patrons will be advised of limited parking availability when booking, and spaces for patrons will be booked with staff prior to arrival.

4. ASSESSMENT AGAINST PLANNING POLICY AND GUIDANCE

Principle of Development

- 4.1 The National Planning Policy Framework (NPPF) is relevant to the consideration of the application.
- 4.2 Paragraph 186 and 187 of the NPPF state that '*Local Planning Authorities should approach decision-taking in a positive way to foster the delivery of sustainable development*' and '*Local Planning Authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.*'
- 4.3 The NPPF at paragraph 8 clarifies sustainable development principles as economic, social and environmental. The current proposal will contribute towards the aim of building a strong, responsive and competitive economy through adding variety to entertainment choice in Reading town centre. The proposal contributes to the social role of the NPPF in supporting strong, vibrant and healthy communities through strengthening the entertainment provision and providing employment within the town centre. The highly sustainable location of the site also means that there would be minimal environmental impact. Consequently, the proposal would not compromise sustainability objectives.
- 4.4 A key aim of the NPPF is to ensure the vitality of town centres and encourages directing retail, leisure and office development towards town centre locations. Paragraph 23 sets out that planning policies should be positive and promote competitive town centre environments, including adding variety and providing customer choice.

Local Planning Policy

Principle of Development

- 4.5 The Councils vision for leisure and retail is that the Town Centre will provide a wide variety of retail, leisure and culture uses, ensuring that uses that attract large volumes of people are in close proximity in a highly accessible location. These include but are not limited to '*leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drivethrough restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls)* Arts, culture and tourism (*theatres, museums, galleries and concert halls, hotels and conference facilities*)'.

The proposal involves provision of a comparatively small scale leisure use which will add to the variety of recreational uses in the town centre.

- 4.6 Core Strategy Policy CS25: Scale and Location of Retail, Leisure and Culture Development requires major retail and main town centre leisure and culture development to take place in, or as an extension to, the centre of Reading. The proposal is for an entertainment/ leisure use and therefore the town centre location is considered desirable and appropriate.
- 4.7 The proposal would achieve the aims of the NPPF and the Core Strategy through the introduction of a new leisure use which the town does not currently offer, increasing the variety of entertainment options in the town centre. The increased variety will assist in drawing in additional visitors and increasing the use of, and spending within, the town centre. The proposal would attract new visitors to the town centre throughout the day, during and outside of normal shopping hours. The proposal will also make use of a vacant office unit, contributing to the vitality of the town centre.
- 4.8 The site is located within the centre core area but is outside of a primary shopping street. As the change of use is from B1(a) Office to D2 Leisure, the proposal is compliant with the requirements of Core Strategy Policy CS27 which seeks to maintain a strong retail character in the centres.
- 4.9 The Sites and Detailed Policies Document (SDPD) recognises facilities that provide opportunities for leisure, recreation, sport and tourism are vital to our physical and mental health, and are a key element of overall quality of life. Policy DM15 supports the provision of leisure uses in Reading town centre and this adds significant support to the proposed change of use.
- 4.10 The sites location within the central core area means that the Reading Central Area Action Plan (CAAP) is also relevant to the determination of this application. The proposed use of the site as an 'escape | experience' falls within the definition of leisure, culture and tourism facilities. The Action Plan recognises that these facilities will assist in widening the variety on offer in the town centre and will help to attract a greater range of people. Additional leisure uses that would attract a wide range of people into the centre are therefore encouraged by action plan policy RC7 and the loss of leisure use is resisted. The site's close proximity to the town centre retail area also means that it would meet the aims of the action plan in catering for a variety of purposes within one visit to the centre, increasing convenience and reducing car-based trips.

- 4.11 Policy RC7 of the Action Plan also sets out that innovative solutions to leisure provision will be encouraged, particularly those that make best use of available (often limited) site area. The proposed escape game use is a new and innovative entertainment experience which is rapidly gaining popularity. It would make good use of the site without harm to the appearance or setting of the Grade II Listed Building, and would not have an adverse impact on the appearance and amenity of the surrounding development. The proposed use would require internal changes to enable the different escape rooms to be provided and the heritage section of this statement demonstrates this will have an acceptable impact. No alterations to the external appearance of the building are proposed. In addition the theme of the proposed use covering World War II is considered to enhance the heritage character of the Listed Building.
- 4.12 It is also considered that the proposed use would contribute towards the 18 hour economy and will be an attractive activity to customers who will likely combine the experience with other activities such as eating out in the town centre. The proposed use would therefore complement the evening and night time economy and increase the range of uses on offer to help cater for different sections of Reading's community. It also offers an alternative activity to drinking which is encouraged in the action plan.
- 4.13 Core Strategy Policy CS10 in relation to the location of employment space sets out that the overall strategy is to seek additional employment provision, particularly offices, in the centre and along the A33 corridor, whilst at the same time allowing the release of areas no longer required for employment use, including some parts of the central area. Whilst the proposal would result in the loss of a small amount of office space, it would still provide an employment use to the town centre in accordance with this aim of the core strategy. The proposed use is anticipated to require 1 x full time staff and 4 part time staff.
- 4.14 In summary, the proposed use is also well suited to the proposed town centre location and would bring additional benefits to the local area as previously set out. Furthermore the town centre location of the proposed leisure use gains significant support from the Action Plan, which sets out a hierarchy of uses within the centre and states that *'major retail and town centre leisure development, including evening economy uses, will take first precedence.'*
- 4.15 Core Strategy Policy CS12 seeks to maintain and where possible increase the overall level of start-up and grow-on space. The proposal is for a new start-up

business (trading since July 2015) which is innovating within the leisure industry and is therefore consistent with the aims of this policy.

Character of the Area and Historic Environment

- 4.16 Core Strategy Policy CS7: Design and the Public Realm sets out that *‘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’*. Development will be assessed in terms of their design and 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’*.
- 4.17 The site is located within the central action plan area and is within the ‘Market Place/ London Street’ Conservation Area. The proposed change of use would primarily involve some internal changes to create 3 new doorways to enable the various ‘escape rooms’ to be set up. These alterations would have no effect on the outward appearance of the building within the conservation area. The proposal’s impact on the fabric of the listed building is addressed in a following section of this report.
- 4.18 The location of the site and the variety of leisure, commercial and office use evident in the surrounding buildings is such that the proposed use would not be out of place and would not have a harmful impact on the character of the area.

Impact to neighbouring uses

- 4.19 The Central Area Action Plan also states that leisure, cultural and tourism development should not give rise to adverse impacts on the amenity of nearby residents and other town centre users or nearby residents and other town centre users, or to existing town centre spaces. It goes on to set out the proposals will be expected to mitigate any potential issues of noise disturbance (particularly night-time related noise), traffic-related congestion, and anti-social behaviour and crime. The proposed escape game use would not generate high levels of noise. The rooms would have some ambient audio to enhance the experience, but would not be of a volume to disturb neighbouring properties. Participants would be briefed on arrival about acceptable behaviour during games including noise levels, and monitoring during games via CCTV with voice commands will ensure this conduct is maintained. Patrons would also be reminded about a quiet neighbourly exit from the site.

Highways

- 4.20 Core Strategy Policy CS24 which refers to Accessibility and Intensity of Development requires that new development must be at a scale, density, and intensity appropriate to the level of accessibility of the site. The existing building in which the change of use is proposed is within the Central Reading Area and as such is considered to be highly accessible to all visitors. Therefore the proposed use would also be at an appropriate intensity for the sites location.
- 4.21 The site is located within parking zone 2 in the Council's Parking Standards SPD (2011). Zone 2 refers to 'areas directly surrounding the core area, well served by public transport'. The parking requirements for D2 uses set out in the SPD provide specific guidance for individual uses such as bowling alley, cinema, golf course and does not provide for the proposed use. The proposed use is considered to fall broadly within the same entertainment category as a bowling alley or cinema, where users would usually arrive by public transport or make use of existing town centre car parks. The site is located within close proximity of public transport links and the Oracle Town Centre car park.
- 4.22 The use will primarily generate foot traffic with a maximum of 21 visitors in a 2 hour period. Customers will have access to on site car parking on a prior booking arrangement but the majority of patrons will be encouraged to arrive via public transport. It is therefore anticipated that the proposed use would not generate significant levels of vehicular movements in comparison to the B1 Office use.

CIL

- 4.23 The existing building has been used for 6 months out of the last 3 years and therefore the chargeable amount is zero.

5. HERITAGE POLICY ASSESSMENT

- 5.1 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (our emphasis)

- 5.2 Similarly, Section 72(1) of the Act sets out the *“general duty as respects conservation areas in exercise of planning functions”* and states:

“In the exercise, with respect to any buildings or land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area” (our emphasis)

- 5.3 This statutory presumption in favour of preservation and the requirement to attach considerable weight to the desirability of preserving a listed building or its setting, or the character and appearance of a Conservation Area have been clarified in the cases of *Barnwell Manor Wind Energy Ltd V E.Northants DC*, *English Heritage National Trust & SSCLG* [2014] and *R. (on the application of the Forge Field) v. Sevenoaks DC* [2014] where in the case of the latter, Mr Justice Lindblom stated:

“The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the right balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation, and if it demonstrably applies that presumption to the proposal it is considering” (our emphasis)

Planning Policy Context

- 5.4 Notwithstanding the statutory presumption set out within the Planning (Listed Buildings and Conservations Area) Act 1990, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

- 5.5 This section of the Statement sets out the planning policy considerations and guidance contained within both national planning guidance and the adopted Development Plan which specifically relate to the application site, with a focus on those policies relating to the protection of the historic environment.

National Planning Guidance

The National Planning Policy Framework

- 5.6 National policy and guidance is set out in the Government's National Planning Policy Framework (NPPF) published in March 2012. The NPPF replaced the previous suite of national Planning Policy Statements, Planning Policy Guidance notes and some Circulars, including those related to heritage and archaeology (Planning Policy Statement 5: Planning for the Historic Environment) with a single, streamlined document.
- 5.7 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.
- 5.8 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 a 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.
- 5.9 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.

- 5.10 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”

- 5.11 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)”

- 5.12 The NPPF goes on to define a Designated Heritage Asset on page 51 as:

“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation” (our emphasis)

- 5.13 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”

- 5.14 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”

5.15 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”**

5.16 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”

5.17 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”**

5.18 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”

5.19 In this case, the refurbishment of the property including the insertion of the new doorways, in connection with its property change of use to Class D2 is not considered to represent ‘substantial harm’ as defined by paragraph 133 of the NPPF. It can also be demonstrated that the proposals would serve to protect the special historic and architectural interest of the Grade II Listed Building and would preserve and enhance the character and appearance of the wider London Street/Market Place Conservation Area.

5.20 As set out in full below, it can be demonstrated that the proposals would serve to protect the designated heritage assets of this part of the both the Grade II Listed Building and London Street/Market Place Conservation Area and thus Listed Building Consent and Planning Permission should be granted as per the requirements of paragraphs 186 and 187 of the NPPF which state that:

“Local planning authorities should approach decision-taking in 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

5.21 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”

5.22 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 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)

5.23 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.”**

5.24 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”**

Historic England Guidance

5.25 With regard to development within historically sensitive areas, Historic England and CABI set out in their guidance document ‘Building in Context – New Development in Historic Areas’ (2001), a number of key considerations which they feel will add to the success of a project. Proposals should:

- **“relate well to the geography and history of the place and the lie of the land**
- **sit happily in the pattern of existing development and routes through and around it**
- **respect important views**
- **respect the scale of the neighbouring buildings**
- **use materials and building methods which are as high in quality as those used in existing buildings**
- **create new views and juxtapositions which add to the variety and texture of the setting”**

5.26 In accordance with the above guidance and due to the limited external alterations, it is considered that the proposals would relate well to the geography and history of the local area, would sit comfortably alongside the existing buildings adjacent to the property, respecting the scale of neighbouring development and important views.

5.27 Historic England has also published guidance and methodology for assessing heritage significance within views, ‘Seeing The History in the View” (May 2011), which provides a consistent base-line for assessing the impact of development on heritage significance within views. They have also published further guidance on assessing the importance of setting of assets, Good Practice Advice Note: The Setting of Heritage Assets (March 2015). Both sets of guidance have also been taken into account in preparing this Statement.

5.28 In respect to Listed Buildings, paragraph 26 encourages the conservation of heritage assets in a manner appropriate to their significance and highlights ‘*the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*’. The proposed change of use will bring the building into a viable use that will allow a wide range

of members of the public to appreciate its form, thus assisting in the conservation of this heritage asset.

The Development Plan

- 5.29 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: -

- **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.”

- 5.30 It is important to note however, that as this policy was adopted prior to the NPPF being issued, the policy guidance does not allow for a balancing exercise to be undertaken in the consideration of proposals relating to heritage assets. As such, Policy CS33 is not considered to comply with the guidance set out within the NPPF and therefore the weight which can therefore be attributed to it is limited.
- 5.31 Whilst the Sites and Detailed Policies document was produced post the adoption of the NPPF, it does not contain and adopted policy guidance in relation to development affecting Listed Buildings or other heritage assets, as whilst general guidance is provided, the document states that the NPPF provides “an appropriate framework for considering proposals for development that affects historic assets in Reading and it is not considered necessary to have specific detailed policies within this document.”

Assessment

- 5.32 It is widely accepted (paragraph 138 of the NPPF) that not all parts of a heritage asset will necessarily be of equal significance and in some cases, certain aspects

of a heritage asset could accommodate substantial change whilst preserving the significance of the asset as a whole. It is therefore key to understand the significance of any asset which may potentially be affected by development proposals in order to understand the scope for, and acceptability of change. Significance can be derived from many elements, including the historic fabric of a building, the layout of space or the land use associated with a building or an area.

- 5.33 In the case of Westminster House, it is clear that the external envelope of the building, along with its relationship with the neighbouring units at numbers 54 and 56 provides the most obvious contribution to the significance of the building and that which would be most sensitive to change. Internally, significance is also attached to the plan layout of the building and the remaining historic fabric. No historic significance is attached to the modern insertions into the building associated with its former office use, such as the modern staircase, partitions and other remnants of the previous office use.
- 5.34 There are no proposed changes to the exterior of the building to the front or the rear, with the existing small wooden plaques which sit beside the front and rear doors being utilised for discrete signage. As such the significance of the building when viewed from the public realm, and the contribution the building makes to the character and appearance of the London Street/Market Place Conservation Area will be preserved. Additionally, the reoccupation of the building will bring a vacant historic building back in to beneficial use, with a compatible and low key use. The number of vacant commercial and retail spaces within this part of the Conservation Area was highlighted within the Character Appraisal as being a feature which had a negative impact upon the character and appearance of the Conservation Area, and thus its significance and therefore the principle of the re-use of the building should be supported.
- 5.35 The internal alterations are again limited and restricted to the insertion of new doorways to between the front and rear rooms at first, second and attic level. The new doorways are essential for the operation of the new use, and will allow participants to move between the front and back rooms on each floor during their immersive experience without having to exit the rooms into the circulation space.
- 5.36 The detailing of the new joinery will be agreed via a suitably worded condition which will ensure that the new doors are of a suitable design which respects the historic character of the property. The current plan form of each of the floors will remain unchanged, with any 'props' or furniture required for each of the

experience rooms being free standing and removable if the proposed use was to cease. The required CCTV and monitoring equipment will utilise the existing cable runs which were installed as part of the refurbishment of the building for its office use, and any new cabling will be sensitively located, without being chased into the plaster.

- 5.37 Whilst the insertion of the new doorways will result in the loss of a minor amount of fabric, the building has already been fully modernised, with little or no historic features remaining internally on the upper levels, and it is considered that the proposals would not negatively impact upon the overall historic or architectural significance of the property, indeed the reuse of the building will ensure that its significance is protected as the building will once again be occupied.
- 5.38 In summary, notwithstanding the considerable weight and importance attributed to the presumption in favour of the preservation of the Listed Building and Conservation Area set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, and in line with the guidance set out within the NPPF at paragraph 134, the proposals are considered to represent less than substantial harm to the historic and architectural significance of the property, and the public benefits would, through the investment brought about by the reuse of the a vacant building with no external alterations, outweigh any perceived harm to the Listed Building. Additionally the proposals would serve to enhance the character and appearance of this part of the London Street/Market Place Conservation Area.

6. CONCLUSION

- 6.1 The proposed change of use will introduce a new leisure use to the central Reading area which is not currently on offer. The 'escape room' experience is rapidly gaining in popularity and has shown to attract a wide variety of groups.
- 6.2 The proposal would therefore be in accordance with the aims of the NPPF and the Core Strategy in enhancing the vitality of town centres. The proposed leisure use would contribute towards the variety of entertainment choice in the town centre and would contribute towards the 18 hour economy, whilst providing a popular alternative to drinking, which is encouraged by the central area action plan.
- 6.3 The site is also in the highly accessible location being close to the town centre and the extensive public transport network connections within close walking distance.
- 6.4 The proposal will also bring a currently unused Listed Building within a suitable use. The change of use would involve only internal changes, aside from replacement plaque signage to advertise the use, which is sympathetic to the host building.
- 6.5 In summary the proposed change of use is considered to be entirely appropriate to the site and would not result in harm to the character of the area or to surrounding neighbouring properties. It would be in accordance with the aims of the NPPF and the Core Strategy and it is therefore respectfully requested that planning permission be granted for the proposed development.

APPENDIX 1

LIST DESCRIPTION



Historic England

54-58, LONDON STREET

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: 54-58, LONDON STREET

List entry Number: 1113523

Location

54-58, LONDON STREET

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: 22-Mar-1975

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: 39044

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

LONDON STREET 1. 5128 (West Side) Nos 54 to 58 (even) SU 7173 SE 3/173 22.3.75. II GV 2. 1753/4. 3 storeys, attic and basement. Brick, brick strings between floors (painted on 2nd floor). Brick dentil and moulded cornice. Parapet. No 54 has mansard slate front slope, rest and Nos 56 and 58 are old tile roof. One dormer. Each house has 3 windows, glazing bar sashes, 1st floor windows have late C18 cast-iron balconies of intersecting arch pattern. Nos 54 and 56 each have one door and modern shop window. Inside No 56 on ground floor is a reeded marble fireplace and a wide panelled hall with arch. No 58 has 2 windows (lacking glazing bars) and one door. Doors have moulded architrave surround and moulded cornice supported on consoles; Nos 56 and 58 have 6 panel doors. Cast-iron spearhead rails with patterned standards. More dormers and occasional grey brick to rear.

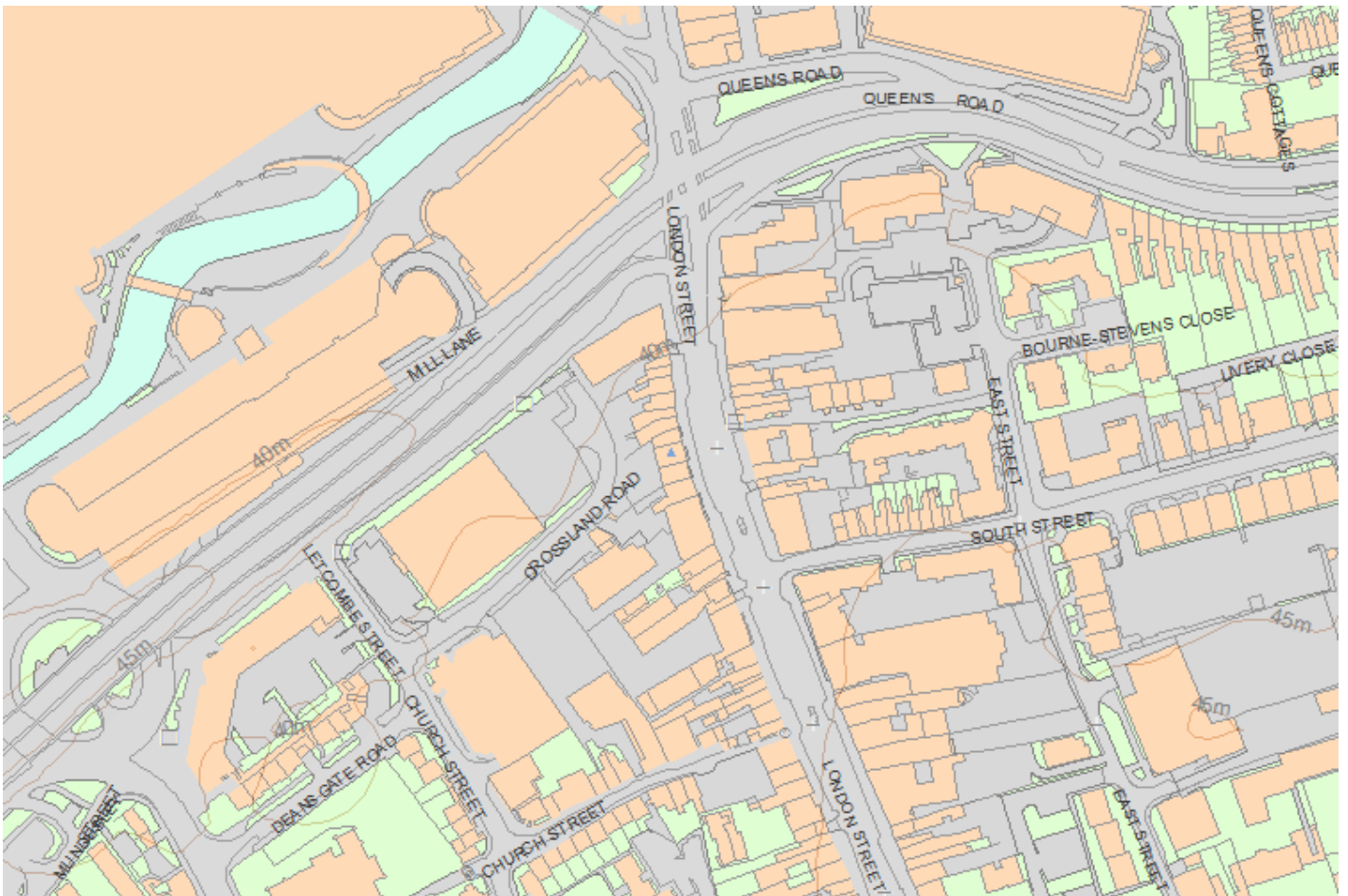
Listing NGR: SU7177373110

Selected Sources

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

National Grid Reference: SU 71773 73110

Map



© Crown Copyright and database right 2015. All rights reserved. Ordnance Survey Licence number 100024900.

© British Crown and SeaZone Solutions Limited 2015. All rights reserved. Licence number 102006.006.

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 - [1113523.pdf](http://gisservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/109931/HLE_A4L_Grade|HLE_A3L_Grade.pdf) (http://gisservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/109931/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 26-Oct-2015 at 01:46:22.