



Heritage Impact Assessment

Napier Court,
Reading

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1. Introduction

1.1 This Heritage Impact Assessment has been prepared by Dr Jonathan Edis, Director of HCUK Group, on behalf of Peveril Securities Limited. It relates to:

Full planning application for demolition of the existing three office buildings, and construction of new 11 storey buildings, with amenity space at roof level (part indoor and set back), to provide 576 residential dwellings consisting of 1, 2 and 3-bedroom apartments. The development will include ancillary facilities for residents, such as a residents' lounge, gym and communal workspace. The buildings will be set in landscaping to the front and between the buildings together with roof terraces. Parking is proposed for 39 cars and 6 motorbikes. Three internal storage spaces are proposed at ground floor for 289 bicycles and an additional 20 cycle spaces are provided externally for visitors. The site is 1.26 ha in size and stretches east to west along Napier Road, bound by the railway line to the south, Napier Road and Kings Meadow to the north, Thames Quarter to the west and a Network Rail site to the east. The site is located within the administrative boundary of Reading Borough Council and is very well connected to the train station, bus services and town centre facilities.

1.2 The site is within the setting of Thames Lido (Kings Meadow Swimming Pool),¹ listed grade II, which is the primary subject of this assessment (Figures 1 to 8).

1.3 This assessment should be read in conjunction with the Townscape and Visual Appraisal prepared by HCUK Group.

1.4 The author of this assessment has more than forty years of continuous employment in the heritage sector, including ten years as a conservation officer advising local planning authorities on applications affecting heritage assets. A large number of those cases have involved development affecting the settings of listed buildings.

¹ The current name of the building is Thames Lido, but it was formerly known as (and statutorily listed as) King's Meadow Swimming Pool.

2. Relevant Planning Policy Framework

- 2.1** The council is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The council must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.²
- 2.2** For the purposes of this assessment, preservation equates to an absence of harm.³ Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.⁴
- 2.3** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.4** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:
- "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 make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."*
- 2.5** Historic England has published guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance proposes a stepped approach to assessment in which Step 1 involves the identification of the relevant heritage assets, Step 2 establishes their significance, and Step 3 describes how the change within the

² Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137.

³ South Lakeland v SSE [1992] 2 AC 141.

⁴ Conservation Principles, 2008, paragraph 84.

setting of the assets might affect their significance. In cases where there is a resultant loss in significance, amounting to harm, Step 4 is engaged, requiring the discussion of mitigation.

2.6 The NPPF requires the impact on the significance of a designated heritage asset⁵ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁶ The Scale of Harm is tabulated at Appendix 1.

2.7 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”

2.8 Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.9 Local heritage policy has been taken into account in the preparation of this assessment, with reference to Local Plan (2019) policies EN1 (Protection and enhancement of the historic environment), EN4 (Locally important heritage assets), and EN6 (new development in a historic context).

⁵ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefields and Conservation Areas, designated under the relevant legislation.

⁶ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

3. Statement of Significance

Introduction

- 3.1** This chapter of the assessment establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The relevant assets are identified in Figure 8, which shows the spatial relationships with the application site – the principal asset in this case being Thames Lido.
- 3.2** The identification of the heritage assets equates in part to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 4 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

Thames Lido (King's Meadow Swimming Pool)

- 3.3** Listed grade II on 25 August 2004, King's Meadow Swimming Pool is officially described as follows:

"Women's Outdoor Swimming Pool. 1902, with minor late C20 alterations. Designed and built by John Bowen, Borough Engineer & Surveyor, at a cost of £4,890. Ironwork made by Allen & Kidgell at their Caversham Bridge Engineering Works. Red and white Brick with ashlar dressings and plain tile roofs. Canopy roofs replaced with C20 corrugated iron. INTERIOR has white tiled rectangular swimming pool 120 ft long and 45 ft wide. Pool surrounded by a covered loggia with a timber roof or canopy. This canopy supported on ornate cast-iron columns, with elaborate brackets above. Octagonal entrance building now masked by C20 temporary boarding. The shallow end retains a large number of original timber changing rooms sited under the surrounding canopy. EXTERIOR has octagonal entrance building projecting from the centre of the long south side. Octagon has tall tile roof with four small dormers, each with tile-hung sides and timber brackets supporting the gables. Main entrance has central doorway topped with a bold ashlar pediment containing a shield bearing the date '1902'. Either side two windows to the octagon and seven windows on either side, the chamfered ends have a single window each.

All these windows are linked by a moulded ashlar cill band, and they are now boarded up. The left end has a single tall chimney stack. All the external walls are orange brick with a white brick band above. The three remaining sides are all blind. This pleasure bathing pool was built to allow Edwardian women to bath in privacy. It was originally fed from the Thames, though it was converted to the mains supply in the 1950s. It is an extremely rare and very fine example of a complete Edwardian Lido."

3.4

King's Meadow Swimming Pool is helpfully described, for present purposes in the following online account:

"The Thames Lido, formerly known as the King's Meadow swimming pool, is an open-air swimming pool or lido located in King's Meadow in Reading, Berkshire It was first opened to the public in 1903 as the Ladies Swimming Bath and is believed to be the oldest surviving outdoor municipal pool of a similar early Edwardian era. In August 2004, as a result of a campaign, the building was awarded Grade II listing status. It re-opened in 2017 after three years of restoration.

The pool traces its ancestry back to 1860 as a bathing area. In 1879, Reading Corporation (now Reading Borough Council) built the largest pool in the South of England, 260 ft (79 m) x 80 ft (24 m), but for men only.

The current pool 120 ft (37 m) x 45 ft (14 m) was built in 1902 near the men's pool (now demolished) so that women could also swim there. It had changing booths and showers and a very high degree of architectural detail, most of which was manufactured locally. The water supply was originally fed from the nearby River Thames.

During the 1950s the water treatment method for the pool changed to mains supply. A heating system was installed, but never used. The pool was closed to the public in 1974, reopening in Autumn 2017.

During the 1990s, the Reading Sub Aqua Club took a lease on the premises and established a non-swimming meeting place, with an intention of creating a regional diving trading centre. The outside of the building became graffitied, vandalised and fell into disrepair. Reading Borough Council invited proposals for the future of the site and, in April 2009, developers Askett Hawk were given permission to build a hotel at the site.

In September 2009, the council rejected the proposal to grant a 250-year lease to Askett Hawk and decided to give a local campaign group the opportunity to develop a scheme to restore the pool for public use.

In 2015 Reading Borough Council approved the renovation of the Lido. The restoration was completed in 2017; as well as reopening the pool, there is a restaurant, small spa and private dining facilities."

3.5 Thames Lido is a building of special architectural and historic interest, significant as an extremely rare and very fine example of a complete Edwardian lido, and as a communally important facility with a local history going back to c.1860. The sequence of maps and air photographs in Figures 1 to 7 illustrate change in the vicinity of the lido.

3.6 There is clearly a contextual relationship between the lido and the River Thames. There is also a relationship with King's Meadow, as a place of recreation. On the other hand, there is no particular historical relationship between the lido and the railway to the south, which developed a series of covered goods yards in the 19th and 20th centuries. Nor is there a historical relationship with Napier Road and Napier Court, which were developed in the late 20th century. To that extent, the lido does not derive any of its significance from that part of its surroundings within the application site.

Other heritage assets

3.7 To the south of the railway is a scheduled monument in Forbury Gardens officially called "Reading Abbey: a Cluniac and Benedictine monastery and Civil war earthwork" (Figure 8). Designated in 1915, with an updated list entry dating to 1993, the scheduled area contains a number of other designated heritage assets, working generally from west to east as follows:

- Forbury Garden a public garden and registered park and garden (RPG) designated grade II in 1987.
- Maiwand memorial (Afghan campaign), 1886, listed grade II in 1978.
- Abbey gate (medieval, listed grade I in 1957.
- Anglian Cross, 1909 (listed grade II in 1978).

- The Plummery Wall, Forbury Road (19th century, listed grade II in 1978).
- Shelter at NE corner of Forbury Gardens, c.1855, listed grade II in 1978.
- Wall between Forbury Park and Abbot's Walk to west of St James's' Church, (19th century, listed grade II in 1978).
- Church of St James's, 1837-1840 by Pugin, listed grade II in 1957.
- St James's Presbytery, 1840 by Pugin, listed grade II in 1978.
- St James Former School Buildings, 1876, listed grade II in 1978.
- Archway connecting Forbury Gardens to Abbey ruins, mid-19th century, listed grade II* in 1978.
- 10, 11 and 12 Abbot's Walk, early 19th century, listed grade II in 1978.
- Reading Abbey ruins (12th century and later), listed grade I in 1957.
- Reading Gaol (1840s by George Gilbert Scott), listed grade II in 1978.

3.8

It is self-evident that the abovementioned heritage assets form a group of considerable significance and importance. They have a shared setting which extends throughout the area to the south and west of the A329 Forbury Road, and which includes a modern urban edge to the north, framed by modern office buildings and a retail park. The scheduled monument and its associated heritage assets do not derive any of their significance from the application site in Napier Road.

Summary of significance

3.9

Designed and built in 1902 by John Bowen, Borough Engineer & Surveyor, Thames Lido is a grade II building significant as an extremely rare and very fine example of a complete Edwardian lido, and as a communally important facility with a local history going back to c.1860. It has contextual relationships with the River Thames and King's Meadow, but it does not derive any significance from Napier Road or Napier Court, in the vicinity of the application site.

3.10

To the south of the railway is a scheduled monument officially called "Reading Abbey: a Cluniac and Benedictine monastery and Civil war earthwork". Designated

in 1915, with an updated list entry dating to 1993, the scheduled area contains a number of other designated heritage assets that form a group of considerable significance and importance. They have a shared setting which extends throughout the area to the south and west of the A329 Forbury Road, and which includes a modern urban edge to the north, framed by modern office buildings and a retail park. The scheduled monument and its associated heritage assets do not derive any of their significance from the application site in Napier Road.

4. Heritage Impact Assessment

Introduction

- 4.1** This chapter of the assessment describes how the proposed development will affect the setting and significance of the heritage assets identified in the preceding chapter. It equates in part to Step 3 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 3 (Statement of Significance) and with the tabular methodology at Appendix 2.

The proposed development

- 4.2** The proposed development involves a full planning application for the demolition of the three existing office buildings at Napier Court, Reading, and the construction of new 11 storey buildings, with amenity space at roof level (part indoor and set back), to provide 576 residential dwellings consisting of 1, 2 and 3-bedroom apartments. The site is located within the administrative boundary of Reading Borough Council. It is also within the setting of Thames Lido (Kings Meadow Swimming Pool),⁷ listed grade II, which is the primary subject of this assessment.

Effect on Napier Court

- 4.3** The three existing modern office buildings known as Napier Court are not of intrinsic heritage interest, and they do not contribute to the significance of any other heritage assets. The demolition of Napier Court will not harm the setting or significance of any heritage assets.

Effect on the setting of Thames Lido

- 4.4** For the reasons stated above, the demolition of Napier Court in its current form will not harm the setting or significance of Thames Lido, since the lido does not derive any of its significance from Napier Court.

⁷ The current name of the building is Thames Lido, but it was formerly known as (and statutorily listed as) King's Meadow Swimming Pool.

- 4.5** The proposed new development will bring about change within the setting of Thames Lido, as discussed and illustrated in the Townscape and Visual Assessment by HCUK Group. It is acknowledged that there will be increases in the height and volume of the new buildings, but this change is not, of itself, harmful to heritage significance in a case where (1) the vast majority of the significance of the lido is bound up in its intrinsic fabric, and (2) such significance as is derived from the setting of the lido is taken from the relationships with the River Thames and King's Meadow (which will not be changed) rather than from land south of Napier Road. In short, the change will not reduce the significance of the listed building.
- 4.6** The visual effect of the proposal is discussed further in the Townscape and Visual Assessment by HCUK Group – see Viewpoint 2 in particular.

Effect on the setting of the scheduled monument

- 4.7** As is evidenced in the Townscape and Visual Appraisal by HCUK Group (see Viewpoint 6 in particular), the visual effect of the proposal on the setting of the scheduled monument known as "Reading Abbey: a Cluniac and Benedictine monastery and Civil war earthwork" and its associated heritage assets will be very slight indeed, resulting in no loss of heritage significance.

Summary of effects

- 4.8** The demolition of Napier Court in its existing form will not reduce the significance of any heritage assets.
- 4.9** There will be a change within the setting of the grade II listed Thames Lido, and within the wider setting of the scheduled monument known as "Reading Abbey: a Cluniac and Benedictine monastery and Civil war earthwork" and its associated heritage assets. The change will primarily involve an increase in the height and volume of the new buildings.
- 4.10** The proposed change will not reduce the significance of any heritage asset. The effect will fall off the bottom of the scale in Appendix 1. Paragraphs 201 and 202 of the NPPF will not be engaged, and there will be no conflict with local heritage policy. There will be preservation for the purposes of the council's duty under section 66(1) of the Act.

5. Conclusions

5.1 Designed and built in 1902 by John Bowen, Borough Engineer & Surveyor, Thames Lido is a grade II building significant as an extremely rare and very fine example of a complete Edwardian lido, and as a communally important facility with a local history going back to c.1860. It has contextual relationships with the River Thames and King's Meadow, but it does not derive any significance from Napier Road or Napier Court, in the vicinity of the application site.

5.2 To the south of the railway is a scheduled monument officially called "Reading Abbey: a Cluniac and Benedictine monastery and Civil war earthwork". Designated in 1915, with an updated list entry dating to 1993, the scheduled area contains a number of other designated heritage assets that form a group of considerable significance and importance. They have a shared setting which extends throughout the area to the south and west of the A329 Forbury Road, and which includes a modern urban edge to the north, framed by modern office buildings and a retail park. The scheduled monument and its associated heritage assets do not derive any of their significance from the application site in Napier Road.

5.3 The proposed development involves:

Full planning application for demolition of the existing three office buildings, and construction of new 11 storey buildings, with amenity space at roof level (part indoor and set back), to provide 576 residential dwellings consisting of 1, 2 and 3-bedroom apartments. The development will include ancillary facilities for residents, such as a residents' lounge, gym and communal workspace. The buildings will be set in landscaping to the front and between the buildings together with roof terraces. Parking is proposed for 39 cars and 6 motorbikes. Three internal storage spaces are proposed at ground floor for 289 bicycles and an additional 20 cycle spaces are provided externally for visitors. The site is 1.26 ha in size and stretches east to west along Napier Road, bound by the railway line to the south, Napier Road and Kings Meadow to the north, Thames Quarter to the west and a Network Rail site to the east. The site is located within the administrative boundary of Reading Borough Council and is very well connected to the train station, bus services and town centre facilities.

- 5.4** The demolition of Napier Court in its existing form will not reduce the significance of any heritage assets.
- 5.5** There will be a change within the setting of the grade II listed Thames Lido, and within the wider setting of the scheduled monument known as "Reading Abbey: a Cluniac and Benedictine monastery and Civil war earthwork" and its associated heritage assets. The change will primarily involve an increase in the height and volume of the new buildings.
- 5.6** The proposed change will not reduce the significance of any heritage asset.

Appendix 1

Scale of Harm

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

Appendix 2

GPA3 Assessment

In assessing the effect of the proposed development on the setting and significance of heritage assets, notably Thames Lido, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

Relevant Considerations

<i>Proximity of the development to the asset</i>	The proposed development is to the south of Thames Lido, within its visual envelope, and readily visible from King's Meadow.
<i>Proximity in relation to topography and watercourses</i>	The local topography is relatively level, with the River Thames to the north of Thames Lido.
<i>Position of development in relation to key views</i>	The proposed development will not intervene in key views of the lido, but it would be fair to say that it is within the visual envelope of the listed building.
<i>Orientation of the development</i>	The proposed development has a linear orientation along Napier Road.
<i>Prominence, dominance and conspicuousness</i>	The proposed development could be variously described as prominent, dominant or conspicuous when seen from King's Meadow, but this will not reduce the significance of the lido.
<i>Competition with or distraction from the asset</i>	The proposed development will not compete with or distract from any heritage assets. The lido will remain a discrete building related to the River Thames and King's Meadow.
<i>Dimensions, scale, massing, proportions</i>	The dimensions, scale, massing and proportions of the proposed development, although evident from King's Meadow, will not reduce the heritage significance of Thames Lido.
<i>Visual permeability</i>	The blocks of the proposed development not be visually permeable in themselves.
<i>Materials and design</i>	Materials and detailed design are for later consideration.

<i>Diurnal or seasonal change</i>	No heritage issues are anticipated in respect of diurnal or seasonal change.
<i>Change to built surroundings and spaces</i>	The space in King's Meadow surrounding the lido will be preserved.
<i>Change to skyline, silhouette</i>	There will be no changes to important skylines or silhouettes.
<i>Change to general character</i>	The general character of the surroundings of Thames Lido will be changed in a way that will increase vitality and introduce better architecture, thereby having the potential to enhance the setting.



Figure 1 – Extract from the O.S map of 1879, surveyed 1875, showing King's Meadow prior to the construction of the Lido and Napier Road. Note the Bathing Place.

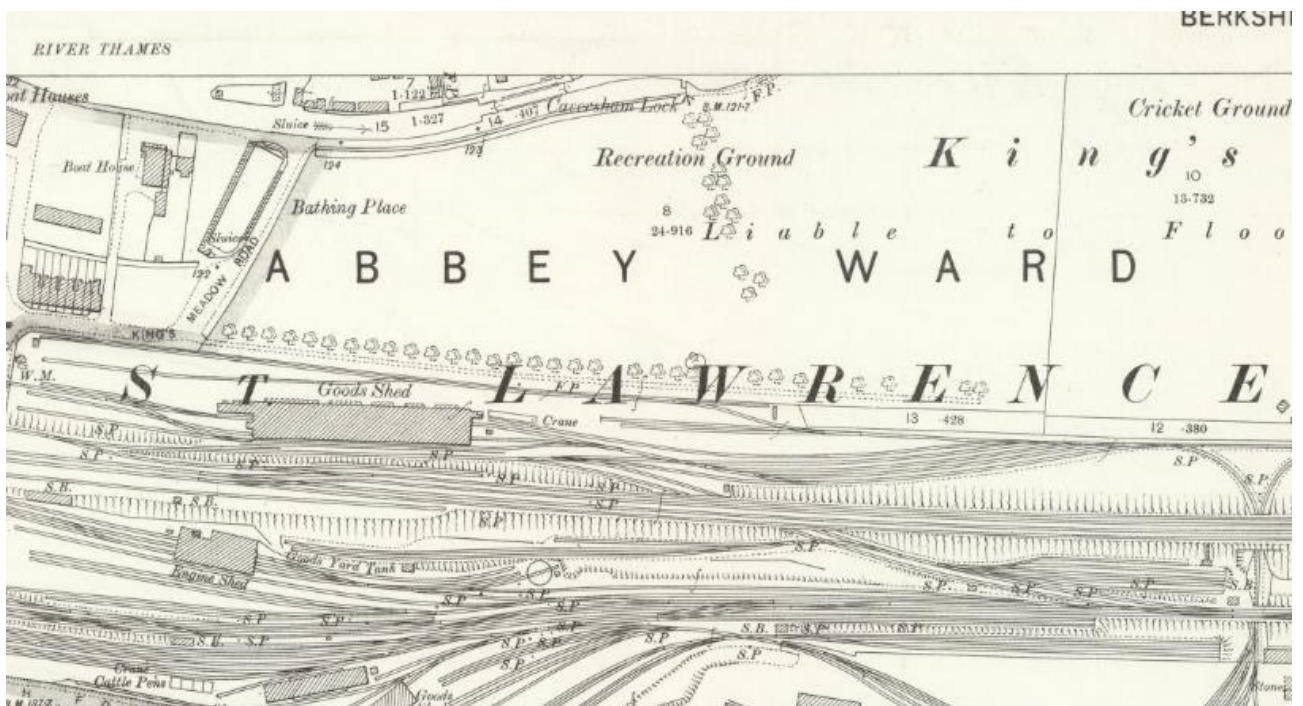


Figure 2 - Extract from the O.S map of 1900, revised 1898, showing King's Meadow prior to the construction of the Lido and Napier Road. Note the Bathing Place.

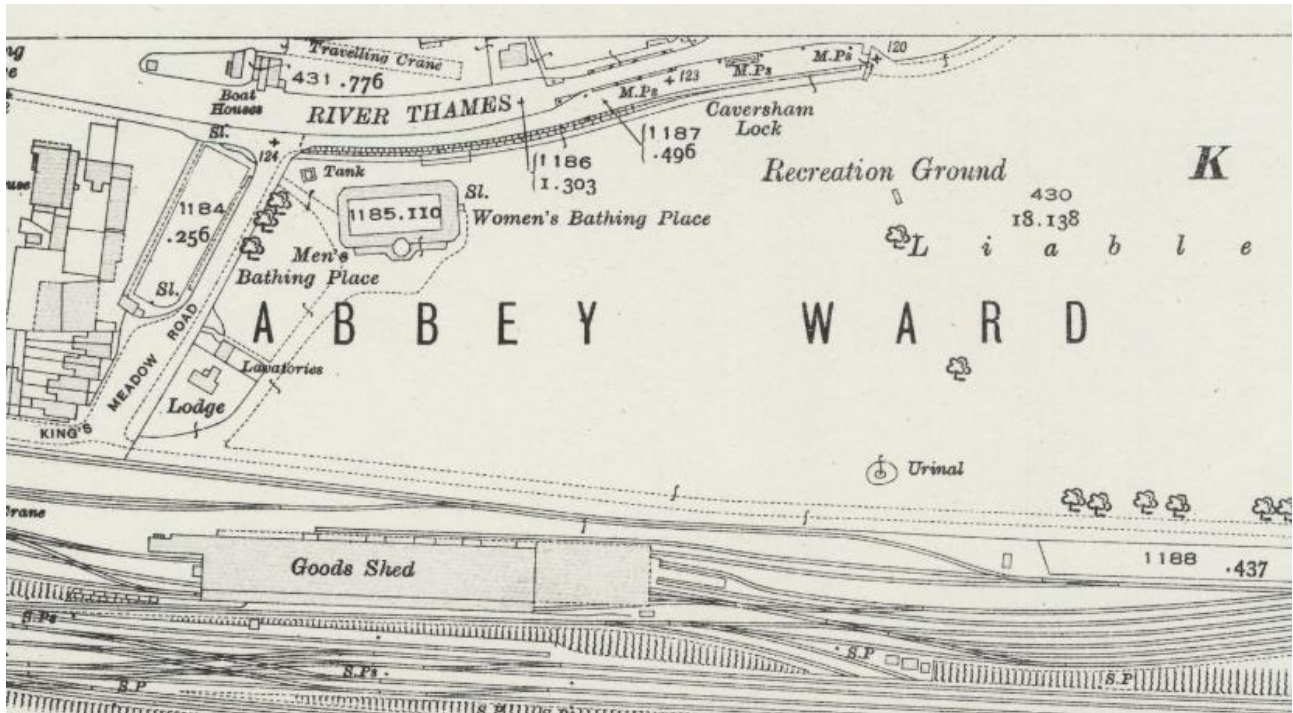


Figure 3 - Extract from the O.S. map of 1934, revised 1931, showing King's Meadow after the construction of the Lido, but before the construction of Napier Road. The Lido and former Bathing Place are enlarged below.

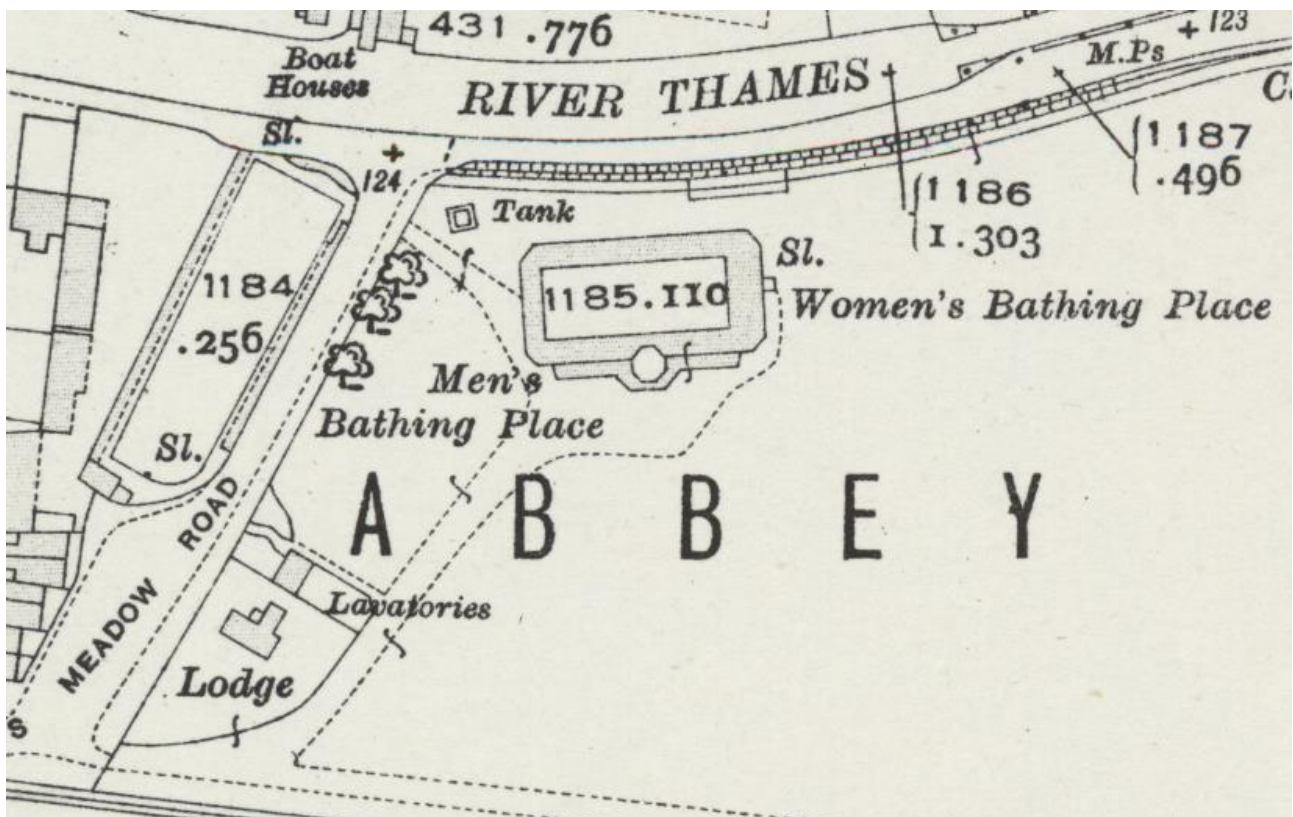




Figure 4 – The Lido and Bathing Place in 1928 (Aerofilms EPW022688, flown 15 August 1928).



Figure 5 – The Lido and Bathing Place in 1955 (Aerofilms EAW061619, flown 4 October 1955).



Figure 6 – Cars parked on the southern edge of King’s Meadow in 1962 (Aerofilms EAW098027, flown 13 March 1962). Reading Bridge House is in the foreground.

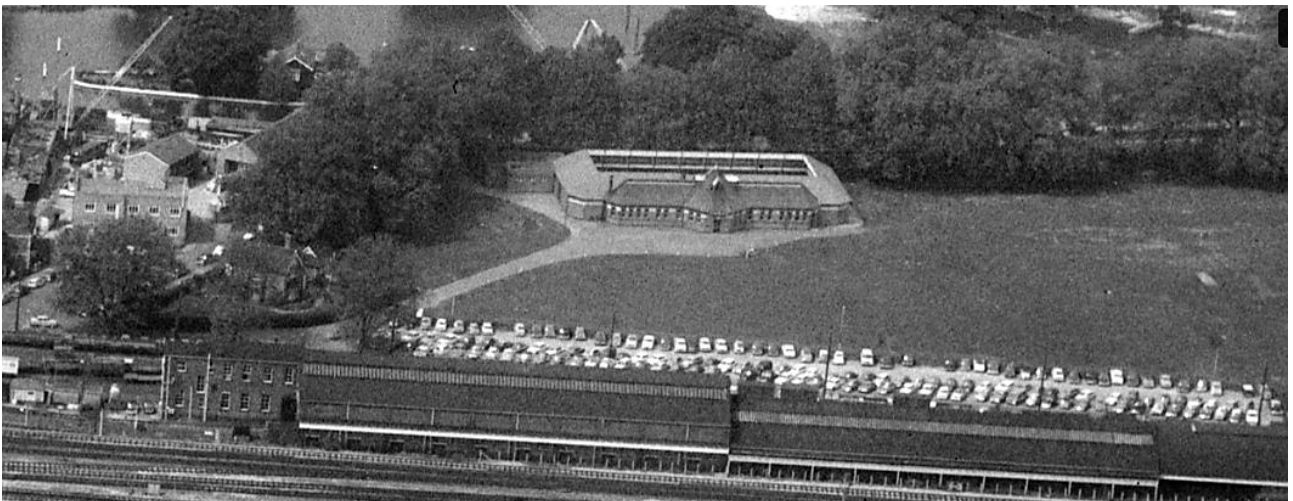


Figure 7 - Cars parked on the southern edge of King’s Meadow in 1968, with the Lido beyond (Aerofilms EAW186084, flown 9 June 1968).

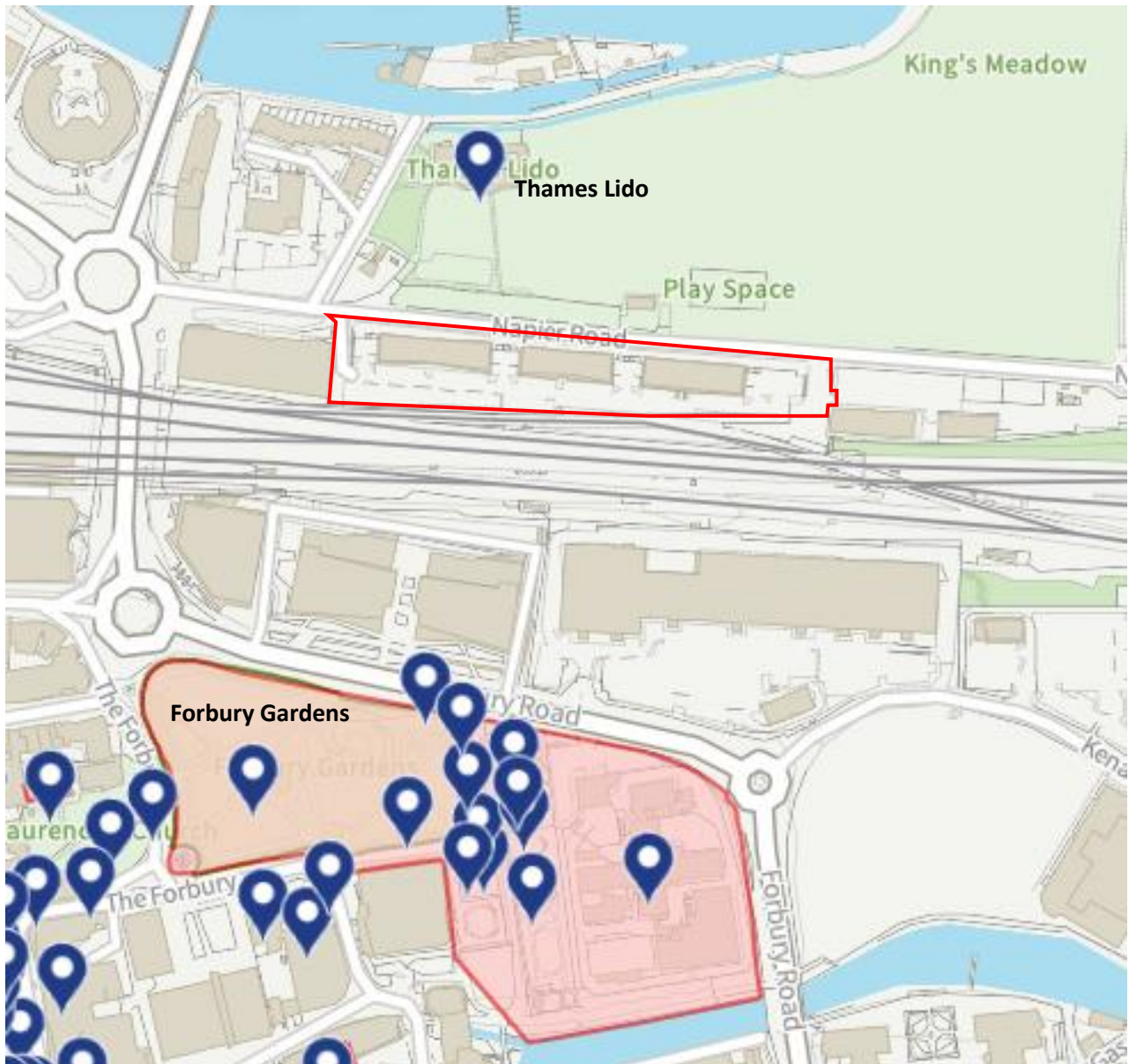


Figure 8 – The application site in relation to Thames Lido and Forbury Gardens (scheduled monument and RPG). Listed buildings are shown with blue pins.