

Memo

WITHOUT PREJUDICE

To: Julie Williams
From: Buju (Burcu) Can Cetin, Conservation Officer
Date: 11/11/2024
Re: Conservation Officer response

Application Number: PL/24/1132 and PL/24/1218

Application Type: Householder planning permission AND Listed Building Consent

Address: 148 SOUTHAMPTON STREET, READING

Proposal: Replacement of rear and front timber sash windows with almost identical wood grain uPVC replacements. These are to be provided by Abbey Windows. Replacement of 3 smaller front opening windows on the sides of the house. Article 4 Application AND Replace 2 sash windows with wood grain uPVC near-identical replica. Sash windows are in very poor condition and windows cannot be opened. Windows leak. Replace 6 interior windows with double glazed windows. Windows are a mix of double glazing, perspex.

Summary

Objection - The proposal would result in the loss of original windows and fail to preserve the character of the listed building, contrary to section 16 of the Act, and offers no significant public benefits that might outweigh that harm as set out in paragraph 208 of the NPPF. The requirement in Policies EN1 and EN6 of Reading Borough Local Plan 2019 for a proposal to have 'no adverse impact' and to 'enhance its significance/make a positive contribution' is not satisfied.

Relevant policies and legislation

From the point of view of the historic environment, the main statutory tests are set out within the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16(2) and 66 require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

National Planning Policy and Guidance

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF (2023) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 200 states, *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."* And Paragraph 201 says, *"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 into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

Paragraph 205 of the NPPF requires 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....'* And paragraph 206 says, *'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification'.*

Paragraph 208 requires that *'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal...'*

National Planning Practice Guidance on Historic Environment provides context to the NPPF.

Local Planning Policy and Guidance

Policy EN1 'Protection and enhancement of the historic environment' of the Reading Borough Local Plan sets out the Council's aspirations for the historic environment. The policy requires that all proposals to protect and, where possible, enhance the significance of heritage assets and *their settings*, historic character and local distinctiveness of the area in which they are located. It echoes the NPPF by stating, *"Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits"*.

Applications which affect *Listed Buildings* are expected not to have an adverse impact on the elements that contribute to their special architectural or historic interest, including their settings.

Policy EN6 'New development in a historic context' also requires *"New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:*

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);*
- b. Sensitivity to historic context;*
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);*
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance."*

Other Guidance

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment".

Relevant heritage assets

The application site forms a part of an impressive mid-19th century mid-terraced pair of Grade II listed buildings, 148 and 150 Southampton Street, a residential flat occupying the first floor and attic of No. 148. The site is not within a conservation area; however, there are several listed buildings along Southampton Street that represent one of the inner pre-Victorian suburban growth of Reading.



The application site (outlined in red) and listed buildings (purple starred)

Significance of heritage assets

The NPPF defines significance as the *“value of a heritage asset to this and future generations because of its heritage interest.”*

The interest may be architectural or historic, as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 Section 1.

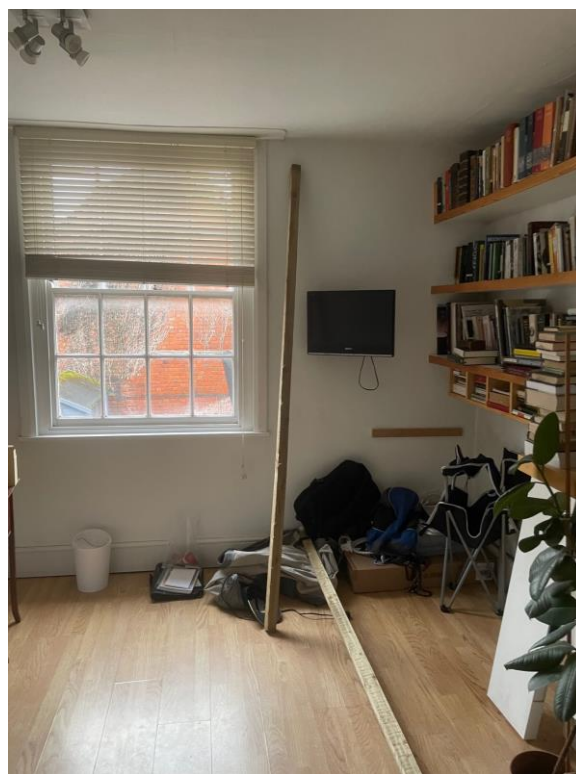
“Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (NPPF, 2023)

Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The official listing of 95 and 97 London Road reads: **“SOUTHAMPTON STREET 1. 5128 (West Side) Nos 148 and 150 SU 7172 NE 4/577 II GV 2. Mid C19 pair continued from Nos 142-146 (even). 2½ storeys. Red brick with stucco cornice and parapet. Slate roof. 3 bays. Set back centre. Side breaks have (No 148) gabled attic and (No 150) ½ hipped attic. Glazing bar sash windows. Paired doors in centre filling recess with plain porches. No 148 has spearhead rails with ornamental bars to gate.**

Listing NGR: SU7175072656”

Officers conducted a site visit and noted that two of the existing windows – multi-pane timber sash windows with horns - reflect the period, early Victorian, of the property and constitute a significant part of the historic and architectural interest of the listed building.



Original Victorian Windows on the first floor front and rear elevations

Impact of proposal upon heritage asset(s)

The proposal would replace the existing original timber sash windows and three other metal windows: a stairwell window on the side elevation, a lounge window and a kitchen window on the top floor/attic with plastic (uPVC) ones.

The replacement of the original front and rear bedroom windows with plastic due to their material would detract from the historic fabric of the listed building. In addition, the original windows in the existing building are not beyond repair. No detailed drawings of the existing windows have been provided for direct comparison either.

The replacement of the other three metal windows, on the other hand, could be acceptable in principle given that they are not original and do not contribute to the significance of the listed building. However, they should have a sympathetic design and material as uPVC is not a suitable or appropriate material for the historic fabric.

I would highly recommend the applicant repair and reinstate the original sash windows and reconsider the remaining existing windows (all windows, including the bathroom, utility room and kitchen) to have a simple design, double-glazed timber windows to be integrated well into the existing historic fabric and architectural features of the building.

The applicant is kindly advised to work with a heritage architect/consultant and read the advice document by Historic England 'Traditional Windows - Their Care, Repair and Upgrading', which states:

"The different appearance and character of PVC-u windows compared to historic windows is highly likely to make them unsuitable for older buildings, particularly those that are listed or in conservation areas. PVC-u is short for Poly Vinyl Chloride un-plasticised and these windows are assembled from factory-made components designed for rigidity, thermal performance and ease of production. Their design, detailing and operation make them look different to traditional windows. (...)"

Therefore, the proposal would result in the loss of original windows and fail to preserve the character of the listed building, contrary to section 16 of the Act, and offers no significant public benefits that might outweigh that harm as set out in paragraph 208 of the NPPF. The requirement in Policies EN1 and EN6 of Reading Borough Local Plan 2019 for a proposal to have 'no adverse impact' and to 'enhance its significance/make a positive contribution' is not satisfied.

Conservation response

- ☐ No objections
- ☐ No objections subject to conditions attached
- ☐ Clarification required
- ☒ Object

Contact details

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