



No. 22 Bath Road

Spire Dunedin Hospital

Heritage Statement

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1 Introduction

1.1 Project Background

- 1.1.1 Stantec have been instructed by Spire Healthcare Group to prepare a Heritage Statement to accompany the submission of a planning application to replace the windows at No. 22 Bath Road, Reading (which forms part of Spire Dunedin Hospital). (“the Site”).
- 1.1.2 The aim of this Heritage Statement is to assess the impact of the proposals. The aim is achieved through the following objectives:
- Identify the heritage assets that may be affected by the proposals;
 - Describe the significance of such assets, in accordance with the National Planning Policy Framework (National Planning Policy Framework (NPPF); 2024); and
 - Assess the likely impacts upon the significance through direct impacts associated with the proposals
- 1.1.3 Paragraph 207 of the NPPF requires applicants to describe the significance of those assets potentially affected by proposed development. This assessment should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposed development on that significance.
- 1.1.4 The property is not a Listed Building and is situated adjacent to the utilitarian form of the main hospital building. However, it lies within the Downshire Square Conservation Area.

1.2 Legislation & Policy

- 1.2.1 Conservation Areas are afforded statutory protection under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72 requires that the decision maker must pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The setting of conservation areas is protected through local and national planning policy.
- 1.2.2 The Downshire Square Conservation Area Appraisal (2009) (CAA) identifies the features that give the Downshire Conservation Area its special architectural or historic interest. The CAA is a material consideration in the determination of applications for development within the Downshire Square Conservation Area.

National Planning Policy

- 1.2.3 The NPPF sets out Government planning policy with Chapter 16 providing policy guidance for conserving and enhancing the historic environment. The guidance recognises the importance of preserving assets in a manner appropriate to their significance and guides that any harm or loss to significance should require clear and convincing justification. Implementation of the NPPF is supported by the Planning Practice Guidance (PPG) (2014 with updates).

Local Planning Policy

- 1.2.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for Reading Borough Council is The Reading Borough Local Plan (2019). The relevant heritage planning policy is Policy EN1: Protection and Enhancement of the Historic Environment and Policy EN3: Enhancement of Conservation Areas.



- 1.2.5 Policy EN1 states that historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. All proposals are to protect and where possible enhance the significance of heritage assets and their setting, and harm should be avoided in the first instance. Clear and convincing justification, usually in the form of public benefits, should be provided in relation to any harm to or loss of a heritage asset. A Heritage Statement should justify applications that affect, or have the potential to affect, the significant features of heritage assets.
- 1.2.6 Policy EN3 requires the special interest, character and architecture of Conservation Areas to be conserved and enhanced. Within Conservation Areas, development proposals must make a positive contribution to local character and distinctiveness and positive consideration will be given to proposals that take opportunities to enhance the character of Conservation Areas. These opportunities may include restoring or re-establishing appropriate paving, railings or walls; sympathetic landscaping and planting; protecting and encouraging the maintenance of green spaces and important trees; improving or restoring green spaces, including front gardens, that are appropriate to the historic interest of a Conservation Area; and reducing visual clutter. Conservation Area Appraisals will be a material consideration in determining applications for development.

1.3 Methodology

- 1.3.1 This statement sets out a history of the Site and surrounding area and assesses the significance of those assets identified as having the potential to be impacted by the proposals, (namely the Downshire Square Conservation Area). This assessment has been informed by a desk-top review and a site visit. This appraisal does not consider the archaeological potential of the Site.
- 1.3.2 To provide an understanding of the site and its surroundings, a range of standard documentary and cartographic sources were examined to determine the likely nature, extent, preservation, and significance of heritage assets that may be relevant. Table 1 below provides a summary of the data sources consulted.

Table 1. Sources Consulted

Source	Data	Comment
Historic England	National Heritage List for England (NHLE) with information on statutorily designated heritage assets.	Statutory designations (scheduled monuments; statutorily listed buildings; registered parks and gardens; historic battlefields; protected wrecks) can provide a significant constraint to development.
Historic Environment Record	Historic Environment Record	Heritage sites and event records and other spatial data supplied in digital format (shapefile).
Internet	Web-published local history; Archaeological Data Service; Online cartographic sites	Many key documentary sources, such as the Victoria County History, and local and specialist studies are now published on the web and can be used to inform the archaeological and historical background. Cartographic sources were used to inform understanding about the historic development from the post-medieval period to present.
Site	Walkover of the Site and surrounding historic environment.	To confirm the topography and existing land use, the nature of any existing buildings and structures, identify any visible heritage assets (e.g., structures, buildings) and assess factors which may have affected the survival or condition of any known or potential assets.

Definitions

- 1.3.3 Annex 2: Glossary of the NPPF defines a heritage asset as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated and assets identified by the local planning authority (including local listing).”

- 1.3.4 Heritage significance is defined in Annex 2 of the NPPF (2024) 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.”

- 1.3.5 The NPPF definition of significance further guides that in the planning context, heritage interest may be archaeological, architectural, artistic, or historic. The definitions are provided in the updated Planning Practice Guidance (PPG).

Designated Heritage Assets

- 1.3.6 It is considered that whilst the Church of All Saints (Grade II Listed) and All Saints Infant School (Grade II Listed) are located approximately 100m to the northwest of the Site and form part of the wider townscape setting of the Site, it is the Downshire Square Conservation Area that is the only designated asset that has the potential to be changed by the proposals.

Non-designated Heritage Assets (Built Heritage)

- 1.3.7 Reading Borough Council has a List of Locally Important Buildings that meet their criteria for identification set out in Appendix 2 of the Reading Borough Local Plan (2019). There are no entries located within proximity to the Site, which are considered to have potential to be impacted by development.

Assessment of Significance

- 1.3.8 The assessment of significance follows the heritage interest-led approach set out in the NPPF, comprising archaeological, architectural, and historic interest. This has been guided by the definitions provided in the updated PPG. The assessment of significance is also informed by Historic England’s GPA2 (2015) and HEAN12 (2019) which provide general advice on assessing significance to ensure Heritage Statements meet the requirements of the NPPF.
- 1.3.9 The heritage interest of an asset’s physical presence is assessed in terms of attributes identified in statutory criteria, general principles for selection (DCMS 2013 and 2018), selection guides published by Historic England, and regional research agendas.
- 1.3.10 Although non-designated heritage assets are not considered to be of sufficient interest to merit formal designation, they are still considered an important feature of the local built environment and thus requires consideration as part of the planning process in line with paragraph 216 of the NPPF.

2 Statement of Significance

2.1 Downshire Square Conservation Area

- 2.1.1 The below details the heritage significance of the Downshire Square Conservation Area and includes a commentary of the contribution the Site makes to its significance.
- 2.1.2 The conservation area, formally adopted in February 1991, comprises a Victorian/Edwardian residential area centred on All Saints Church. Its boundary is tightly drawn around the planned formal layout of Devonshire Square and Maitland and Bownlow Roads, both streets extend north from Devonshire Square to Tilehurst Road. The south boundary of the conservation area is Bath Road.

2.2 Historical Background

- 2.2.1 The following section provides a summary of the historical development of the Site and its environs, compiled from sources listed in the references section.
- 2.2.2 Up until the early 19th century, the settlement of Reading was largely contained within its Medieval core. Its principal trades were wool and leather in the 16th and 17th centuries, expanding to brewing, iron-founding and brick and tile making in the 18th century. As a result of its good road and river links, Reading was an important market and coaching town. The opening of the Kennet and Avon Canal in 1810 increased communication and trade between Reading, London, and Bristol. However, it was the arrival of the Great Western Railway in 1840 that led to the rapid expansion of major industries in the area, notably Huntley & Palmer and Suttons Seeds¹.
- 2.2.3 Rapid population growth between 1850 and 1900 led to the post-railway late 19th century expansion of the town. In response to this increased demand for housing growth, Downshire Square was planned as a formal layout in c1853 by Poulton and Woodman. Located outside the town centre, it was designed as a spacious, leafy, suburban area intended for the middle classes. The layout took the form of two arms extending north from Bath Road and linking at All Saints Church. Nos. 24 and 26 Bath Road, also designed by Poulton and Woodman, mark the entrance from the south. Brownlow Road and Maitland Road link Downshire Square with Tilehurst Road to the north.
- 2.2.4 Development in this part of Reading was slower than the east. Following the removal of a turnpike gate near Tilehurst Road, the rate of development increased along Bath Road in the form of stone, brick and stuccoed villas in generous plots. The rate of development within the conservation area was much slower; by 1883 only a handful of plots had been built on together with All Saints Church in 1865-74 and All Saints School (1865-60, both to the designs of St Aubyn) (not reproduced). The area to the south of Bath Road extending to Coley Park, remained rural.
- 2.2.5 By 1900, houses were beginning to be built along the north side of Bath Road, including Nos. 16 – 22 Bath Road. A terrace of houses can be seen along the west side of the west arm of Downshire Square in the 1900 OS Map (not reproduced), although by 1913 these houses are shown as No. 3 semi-detached pairs of houses. Detached houses were also beginning to occupy the plots on Brownlow and Maitland Roads to the north, although the northern plots of Downshire Square remained vacant. To the south of Bath Road, new residential streets had been established together with Coley Recreation Ground to the west of Coley Park. By 1947 (not reproduced) the development of plots within the conservation area was largely complete, and its low-density character, representative of this part of Reading, was maintained. The plots to the rear of Nos. 16 – 22 Bath Road however, including the Site, were still vacant.

¹ Downshire Square Conservation Area Appraisal, Reading Borough Council (2009)



- 2.2.6 Nos. 37 Devonshire Square and the neighbouring properties at Nos. 31 – 35 are likely to have been constructed in the post-war period or later. No. 37, known as “The Bungalow”, has been in use as accommodation for Dunedin Hospital’s Residential Medical Officer since at least 1989 and was converted to office use associated with the hospital in late 1993/early 1994.²

2.3 Character of the Downshire Conservation Area

- 2.3.1 The special interest of the conservation area is set out within the Downshire Square Conservation Area Appraisal (CAA) (2009). The special interest lies in the formal planned layout of the streets, the Victorian and Edwardian dwellings, the Grade II Listed All Saints Church and Infant School, and the later development of a variety of house types and architectural styles that reflect the original character of the area. Development sits within large tree lined plots, giving a feeling of spaciousness within a verdant residential setting. The special interest of the area is further defined in the conservation area appraisal as:

“The variety, exuberance and blending of the architectural styles of the Victorian and later periods in what was originally envisaged as formal street layout with large tree lined plots makes the area attractive and worthy of conservation area status. This is reinforced by the retention of boundary walls and railings throughout the area, which together with mature tree cover, including good avenues of street trees in the streets comprising the two arms of Downshire Square, give the area its coherence, with All Saints Church and All Saints School dominating its centre.”

- 2.3.2 The conservation area has been divided into three character areas, of which the Site (Number 22) sits within Character Area 3: The entrance to the area from Bath Road. The special interest of Character Area 3 is defined in the CAA as:

“The entrance is dominated by a magnificent pair of Victorian sandstone houses (number 24 and 26 Bath Road). Architectural details and links include castellations and hexagonal towers. Number 22 is in a similar style but more domestic in scale and built of brick. 1930s architecture is represented by the inclusion of Florida Court, with several flats under a single green pantile roof grouped round a landscaped court. The detailing is typical of the period and shows a strong horizontal emphasis to the windows and solid balconies. Again, street trees, garden trees and brick walls and railings form a linking feature through the area.”

- 2.3.3 Nos. 37 and 39 Downshire Square and No. 22 Bath Road are located within the easternmost extent of the conservation area. The three detached buildings, all in use associated with the hospital, vary in age and character. Nos. 37 and 39 Downshire Square also lie within the conservation area. In contrast to No. 22 Bath Road, Nos. 37 and 39 Downshire Square are modest mid-20th century former dwellings set back from the street frontage.

Contribution of No 22 Bath Road to the Downshire Conservation Area

- 2.3.4 No. 22 Bath Road is a three-storey 19th century villa built in the Gothic revival style, similar to Nos. 24 and 26 Bath Road but in brick rather than sandstone and more domestic in scale and form. The building, together with Nos. 24 and 26 are identified within the CAA to be “Buildings of Townscape Merit” that make a positive contribution to the special interest of the conservation area. As relatively unaltered 19th century building that have a presence as corner buildings and contributes to the interest and variety in the streetscape.

² Reading Borough Council Planning Application Ref. 06/00110/CLE/ACL (2006).

3 Impact Assessment

3.1 Summary of Proposals

- 3.1.1 The existing wooden windows are in a significant state of disrepair and the proposals aim to improve the appearance of the building and its energy performance (in order to meet new Energy Performance Certificate (EPC) requirements) by replacing the windows with new timber-effect PVC-U windows that replicate the existing style and colour of the windows.

3.2 Impact Assessment

- 3.2.1 No. 22 Bath Road is not listed but lies within the Downshire Square Conservation Area and therefore falls within the duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, specifically the duty to provide special attention to *“the desirability of preserving or enhancing its character or appearance”*.
- 3.2.2 The Conservation Area’s heritage significance derives from the setting of large Victorian and Edwardian plots within a tree lined formal street layout with boundary walls and railings and centred on the All Saints Church and Infants School.
- 3.2.3 In principle, provided the replacement windows are in keeping with the existing traditional form and appearance then there would be no incongruous architectural additions within the conservation area, and it would be judged that the character and appearance will be preserved in line with Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Local Policy.
- 3.2.4 Following the Site visit and review of the application materials, it is considered that the existing windows on the No. 22 Bath Road are of poor quality and do not represent an architectural feature of material value, only the form of the windows reflects the historic contribution the fenestration makes to the conservation area. The windows are understood to require replacement due to their current dilapidated condition and the need to improve thermal efficiency within the building.
- 3.2.5 The replacement of the windows at No. 22 Bath Road with ‘timber-effect’ windows that are like for like in style, form and colour will maintain the existing appearance of the building and ensure its heritage significance is sustained. Therefore, the proposals demonstrate special attention to *“the desirability of preserving or enhancing its character or appearance”*. It follows that the character and appearance will be preserved in line with Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and Local Policy.

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