

TECHNICAL NOTE

Job Name: No. 22 Bath Road

Note No: 02

Date: August 2025

Prepared By: Harry Clarke, Heritage Planning Associate Director

Subject: Updated Heritage Assessment

- 1.1. This note has been prepared in response to correspondence received on 7 July from the Case Officer at Reading Borough Council (RBC) which set out the Conservation Officer's comments in relation to the application.
- 1.2. The application relates to a detached two-storey (with attic) property dating to the 1899, a late Victorian villa, located on the corner of Bath Road and Downshire Square, within the Downshire Conservation Area. The site is also approximately 90m distant from Castle Hill/Russell Street/Oxford Road Conservation Area.
- 1.3. The proposal originally sought consent for the replacement of all existing windows, including original traditional sash windows, with uPVC, which would have a timber-effect. The Conservation Officer concluded in their comments that:

"The replacement of all original timber sash windows would result in the loss of original elements and details. The proposed replacement uPVC windows would not constitute the design, detail, material and appearance of the traditional windows that the building has. They would not be suitable for the period of the host building or the character and appearance of the conservation area. As such, the proposal would not enhance the significance of the conservation area, failing to comply with policies EN1, EN3 and EN6 of the Reading Borough Local Plan. The proposed development cannot be supported on heritage grounds."

- 1.4. Following a receipt of these comment and a site meeting with the Conservation Officer and the Case Officer amendments were made to the scheme which reduced the number of windows being replaced. The amended proposals are shown on drawing no. 0170-Rev A.

Significance of Downshire Conservation Area and Contribution of the Site

- 1.5. The Heritage Statement submitted sets out the significance of the Conservation Area, such that it is not repeated here. In summary, the special interest of the Conservation Area is derived from its historic and architectural interest as part of a formal planned area of development within Reading, comprising 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. The architectural variety and quality throughout the Conservation Area are reflective of the 19th century expansion of the town, designed as a leafy suburb for the growing middle classes during this period.
- 1.6. The site is located within 'Character Area 3: The entrance to the area from Bath Road' identified within the Conservation Area Appraisal (CAA). Nos.24 and 26 Bath Road are identified as being a "...magnificent pair of Victorian sandstone houses". The CAA notes that No. 22 is similar in architectural style but is of brick construction and more domestic in scale.
- 1.7. No. 22 Bath Road is a three-storey 19th century villa built in the Gothic revival style. The building, together with No. 24 is identified within the CAA to be "Buildings of Townscape Merit" that make a positive contribution to the special interest of the Conservation Area. No further assessment is provided in the CAA as to why this is the case other than a statement that "...it is generally unlisted corner buildings which strictly have a more commanding presence. Although not visible from any great distance, the following buildings are considered to fall into this category..."

TECHNICAL NOTE

- 1.8. In their comments received on 7 July, the Conservation Officer has provided further detail as to why the LPA consider the building to be of heritage interest, stating:

“...given the history, architect and architectural features of the building, it is considered that the building meets some of the criteria for the locally listed buildings / non-designated heritage assets / buildings of townscape merit within the conservation area. The building was designed by a local architect, William G. A. Hambling, for Mr Edward Farrer as a residence. Known as ‘Greycourt’ when constructed, the building constitutes many of the characteristic features of the late Victorian Period: the roof with different patterned tiles, two-storey bay, single pane sash windows, etc. The use of grey, buff colour and red brick, as well as stone cross windows (with vertical mullions and horizontal projecting bands/transoms), and carved stone ornamentation on its facade represents the Reading style influenced by the Domestic Revival house/villa. As such, not only the building’s contribution to the significance of the conservation area but also its location, distinctive architectural features, and history should be sensitively treated in an application.

The site first appears on the historic OS Map of 1898 with a conservatory on its western elevation that was lost after the 1970s. However, when compared with the historic photograph below, the building is still intact, preserves most of its original features, and is an attractive building at the entrance of the Downshire Conservation Area.”

Impact Assessment

- 1.9. As noted in the originally submitted Heritage Statement, the current condition of the windows is generally poor. The building has not been in use by the hospital for a number of reasons, primarily that in its current form and condition, the property was not fit for purpose and did not meet the hospital’s requirements. The hospital is now seeking to bring the building back into active use and as a result upgrades are required to ensure that it is fit for purpose.
- 1.10. One of the key concerns for the hospital is that the works proposed secure the long-term viability of the property and minimise any future maintenance and operating costs. The option of repairing and refurbishing all of the windows with localised replacement units in timber was explored by the applicant. This quotes option was costed at £265K. This is therefore cost prohibitive and is not a financially viable option.
- 1.11. The amended proposals now include the retention of the following windows within the property:
- **Principal Elevation:**
 - Windows at attic level within the gables (W48, 49, 50, 51, AND 52)
 - Fanlight and side panels to front door
 - **Eastern Elevation:**
 - Window to gable at upper floor (W57)
 - **Rear Elevation:**
 - Windows at attic level within dormer and gable (W54, 55, 56, 57, and 58)
 - Stained Glass windows at 2nd floor (W42 and 43)

TECHNICAL NOTE

- 1.12. This approach was agreed on site with Officers as a compromised position which would see the retention of the decorative stained glass which contributes to the architectural interest and quality of the building. As well as the retention of the windows at the upper floor, of which the frames are not recessed within the stone work and are more visible within the front and rear elevations. It has also been confirmed by the client that trickle vents are not to be included on the replacement windows as to address the concerns raised previously by the Conservation Officer.
- 1.13. The windows which are to be replaced appear to be recessed into the stone surrounds, and the proposed windows would be installed in a similar fashion to limit any visual change to the elevations, particularly on the principal elevation. Those windows to the rear and gables are located on secondary elevations and which the exception of the two stained glass windows on the rear, make limited contribution to the significance of the building and the Conservation Area.

Conclusion

- 1.14. It is considered that whilst the amended proposals will still result in the loss of some fabric, this has been limited to those areas of lesser heritage value and the proposals would now preserve the architectural quality of the building, reducing any perceived impact on the character and appearance of the Conservation Area.
- 1.15. No.22 Bath Road is not a listed building, as such there remains a requirement for works to the building to seek to meet building regulations, as far as is reasonably practicable. The building is not a domestic structure, and the regulations are clear that works to buildings within Conservation Areas do *“not need to comply fully with the energy efficiency requirement, where to do so would unacceptably alter the building’s character and appearance”*.
- 1.16. The windows to be replaced within the building are of a simple design and do not feature glazing bars which are usually the most contentious element of PVCu windows on traditional buildings. The windows will be installed to match the existing frames, limiting the extent of frame that is visible within the elevations, such that any perceivable change will be minimal following completion of the works. It is therefore not considered that the proposals would unacceptably alter the building’s character or appearance, such that the scheme does go some way to meet the building regulation requirements.
- 1.17. Notwithstanding the above, the installation of PVCu windows in the manner proposed will significantly reduce the long-term maintenance costs of the building, as well as the decreasing operating costs through improved thermal efficiency. Given the financial difficulties facing the Healthcare Sector in generally and the ongoing increases to materials, construction, and energy, the financial implications of the scheme and resulting benefits must form a key consideration in the determination of the application.
- 1.18. In regard to the impact on the Conservation Area, any impact needs to be considered in the context of the Conservation Area as a whole. As noted above, the proposal has been amended to reduce the perceived visual impact of the changes on the principal elevation, which makes the greatest contribution to the significance of the Conservation Area. It is therefore considered that the proposals present a successful compromise whereby the character and appearance of the Conservation Area is preserved in accordance with Section 72 of the 1990 Act.
- 1.19. Should the Council still consider that there would be a negative impact on either No.22 or the Downshire Conservation Area, this harm would be low and negligible respectively. In regard to the non-designated heritage asset, a low level of harm would need to be balanced against the public benefits of the scheme (NPPF, para.216). In regard to the Conservation Area, a negligible level of harm would fall within the bracket of less than substantial harm and would need to be weighed against the public benefits of the scheme (NPPF, para. 215).
- 1.20. The public benefits of the scheme are set out below and would outweigh any harm that the Council may still consider would arise from the proposals.

TECHNICAL NOTE

- Reading Council declared a climate emergency in 2019 and the Climate Emergency Strategy notes that there is “...*potential to reduce energy demand with ‘deep retrofit’ of the borough’s housing stock and commercial buildings...*”. The proposed window replacement and internal works to the building seek to reduce the demand and energy consumption for the building, contributing to Reading’s vision to be Net Zero by 2030.
- Contributing towards Spire Healthcare’s Corporate Sustainability goal to deliver carbon neutrality by 2030.