



Heritage Impact Assessment

81 London Street,
Reading

September 2023 | Project Ref 09406A



Project Number: 09406A

File Origin: C:\Users\SamDavis\HCUK Group\9001-9500 - Documents\9401-9500\09406 - 81
London St,Reading\HER\Reports

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App. 1 Scale of Harm table (HCUK, 2019)

1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Mr Samuel Lipschitz. It relates to an application for a conversion of the third floor at 81 London Street, Reading, RG1 4QA from office space to residential. Reading Borough Council (RBC hereafter) are the determining authority.

1.2 81 London Street is a grade II listed building (UID: 1321930) first designated in December 1978. The building was constructed c.1800 and is a 3 storey, red brick building. Internally, it has undergone significant alteration during its conversion into office space and at the rear it has a large modern extension.



Figure 1: 81 London Street

- 1.3** In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2021) this statement describes the significance of the identified heritage assets.

The Proposals and Relevant Background

- 1.4** The proposals at 81 London Street have been based on a thorough understanding of the significance of the listed building and seeks to sensitively convert the third floor into residential use while preserving the property's unique heritage values.

- 1.5** Full details of the proposals are found elsewhere in the application submission and provided drawings but can be summarised as:

- Change of use of third floor from office space to residential;
- Sub division of floor into 3 flats; and
- Removal of modern partitions and addition of new partitions.

Heritage Assets

- 1.6** 81 London Street is located within the Market Street/London Street Conservation Area. It is also within the setting of several other designated and non-designated heritage assets. As the works are internal these assets have been scoped out the assessment which instead focuses on the effect on the grade II listed 81 London Street.

Purpose of this Assessment

- 1.7** The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The

report also sets out how the proposal complies with the guidance and policy of the National Planning Policy Framework (NPPF) 2021 and local planning policy. The site and heritage assets affected have been observed and assessed following a site visit made by the author in September 2023.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) 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 decision maker 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.¹
- 2.2** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³
- 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 NPPF requires the impact on the significance of a designated heritage asset⁴ 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.⁵ The Scale of Harm is tabulated at **Appendix 1**.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

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

³ Conservation Principles, 2008, paragraph 84.

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

2.5 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.⁶ 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.

2.6 Paragraphs 199 and 200 of the NPPF state 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.

2.7 One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

2.8 RBC's adopted Local Plan (November 2019) includes Policy **EN1: Protection and Enhancement of the Historic Environment:**

Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*

⁶ The balancing exercise was the subject of discussion in *City and Country Bramshill v CCSLG and others* [2021] EWCA, Civ 320.

- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. 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 will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings...Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

3. Background and Development

3.1 London Street has medieval origins⁷ and is shown on John Speed's 1611 map of Reading as an established route north to south from the High Bridge to Ort Lane⁸. What appears to be a house is shown on the site of the existing 81 London Street.

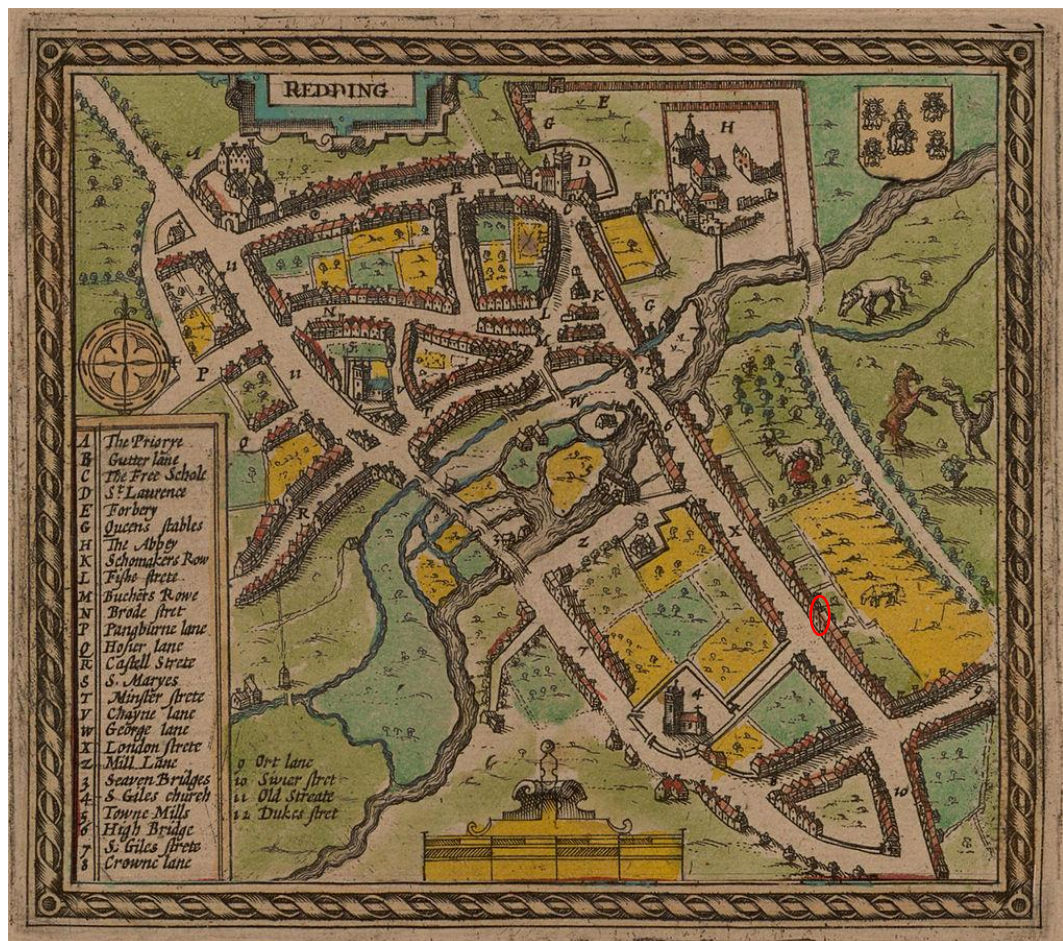


Figure 2: John Speed's 1611 Map of Reading. Red circle is approximate location of 81 London Street

3.2 In the 18th and early 19th centuries London Street became popular with the wealthier residents of Reading and many elegant houses were constructed⁹, including 81 London Street in c.1800. Coate's Map dating to 1802 shows the houses

⁷ Though few medieval and 16th/17th century buildings survive on the street, some properties do contain the older structures behind the Georgian facades.

⁸ Ort Lane was renamed New Street by 1802 and then later it became part of the London Road.

⁹ Market Street/London Street Conservation Area Character Appraisal, 2007, RBC

lining the street, some with rear ranges and gardens behind. No.81 is shown but not in any detail, though it does appear that a long range of extensions and ancillary buildings existed to the rear.

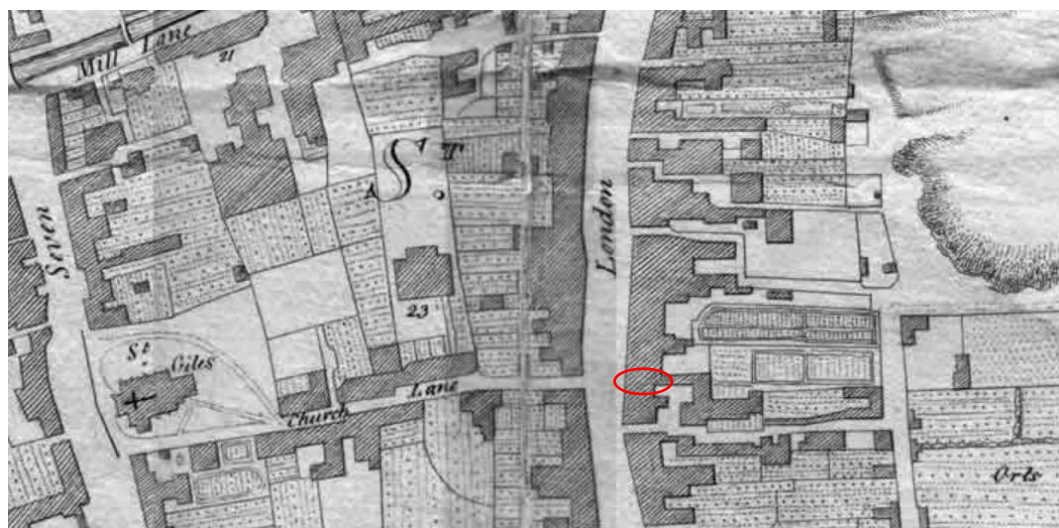


Figure 3: Coate's Map of Reading 1802. Red circle makes approximate location of 81 London Street.

3.3 The 1853 Health Maps¹⁰ usefully records residential properties in pink. Therefore, it is clear that No.81 was still in residential use in 1853. At this time No.81 was known as No.94 London Street.

3.4 The 1871 Census indicate that No.94 (No.81) was occupied by a butcher named William. His surname is difficult to make out but it appears that Colebrook has been crossed out. The 'Account books of Messrs Colebrook & Co of Reading, butchers' dating from 1890-1896 record that the butcher's first shop was located on London Street in 1863¹¹. This suggests – and is supported by later photographs – that sometime between 1853 and 1863 No.94 (No.81) became a butchers shop and its ground floor was converted to commercial purposes¹², with living accommodation in the upper floors.

¹⁰ Surveyed by John Clacy (1810-1880) the county surveyor.

¹¹ Catalogue reference R/D129, Berkshire Record Office

¹² Catalogue reference R/ES12/64/1-23 (Bills and vouchers settled in 1849) states that 81 London Street, Reading was in use as a 'grocer, tea merchant and wholesale provision warehouse' in 1848. However, it is part of the annual statements of accounts for the 'Boys School'. No other record of 81 London Street being a Boys school has been found by the author, but there is for 81 London Road. Therefore, it is an informed assumption that this is a mistake (supported by the 1853 map which shows 81 London Street in residential use).

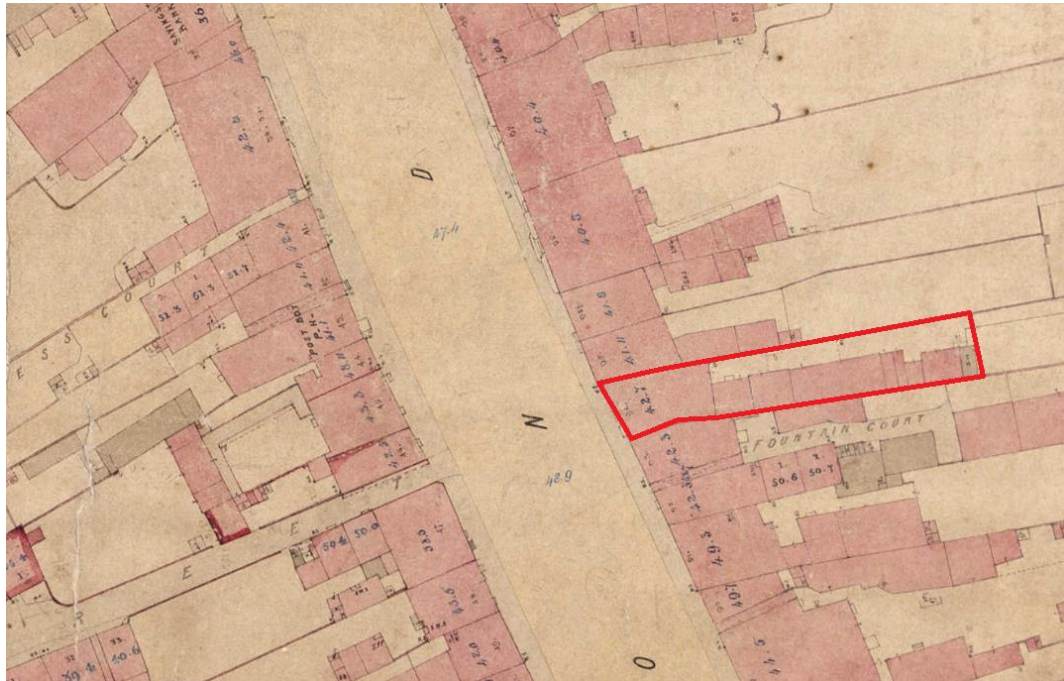


Figure 4: 1853 Health Map

3.5

All of the census and register records from 1881¹³-1939 indicate that the property remained in use as a butchers. Aside from a slight increase in the built form of the rear ranges the OS maps from 1875 to 1934 show that the footprint of the building largely remained the same.

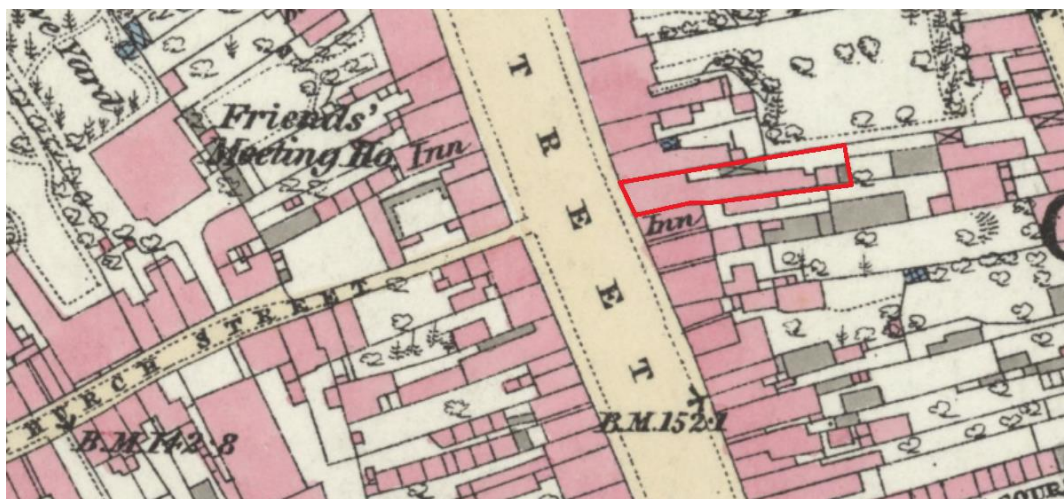


Figure 5: OS Map Surveyed 1875, Published 1879 © National Library of Scotland

¹³ From 1881 the address is recorded as 81 London Street.

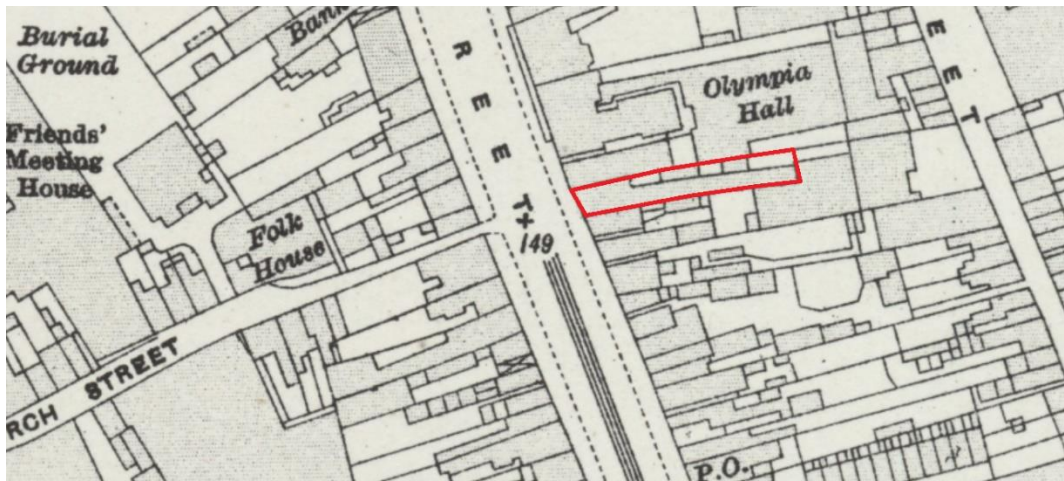


Figure 6: OS Map Surveyed 1931, Published 1934 © National Library of Scotland

3.6

Photographs taken in 1943 show No.81 still in use as a butchers. After over 80 years as a butchers it is unclear exactly when this association ended, but by 1971 the property was in use as Reading Fine Art Gallery Ltd (Figure 8).



Figure 7: 81 London Street 1943 © Historic England. The historic roof form is clearly visible.

3.7

Sometime in the late 20th century the rear extensions are demolished and replaced with a three storey modern extension. It is highly likely that around this time the

historic interior of the building was removed and replaced with modern offices¹⁴; and the original roof was removed. The design of the extension – and the fact that planning permission was granted for the change of use of No.81 from retail use to an office for financial and professional services or business use in 1999 – suggest that the removal of the historic interior of the building occurred in the late 1990s or early 2000s. Unfortunately, the planning records for this application have not been retained¹⁵.



Figure 9: 81 London Street 1971 © Historic England

Description of 81 London Street

3.8 81 London Street was first listed on 14th December, 1978. It was officially described then:

Circa 1800. 3 storeys red brick with band over ground floor. Stucco entablature and parapet. Slate roof. 3 ranges of glazing bar sash windows (1 panel on 2nd floor). Modern shop front.

¹⁴ Only third floor and corridors of 81 London Street have been assessed, but drawings from planning reference 120423 seem to suggest this is the case on all floors.

¹⁵ Both the Reading Borough Council (RBC) Planning Department and Royal Berkshire Archives have been consulted.

3.9 The front elevation remains largely as described in the list description, aside from the slate roof – which has been replaced. The windows have been replaced with timber replicas that are keeping with the style and period of the property.

3.10 At the rear is a large, modern three storey extension, with a gable and constructed of red brick (Figure 13).



Figure 8: Former rear wall within a cupboard

3.11 For all intents and purposes the third storey of the listed building is a modern construction. At the rear – within the modern extension – is one large office room. In the north corner of the room is access to the rear stairwell, toilets and staff kitchen. This space then leads into a hallway. There is a small office room off the hallway which looks out onto a lightwell (east side). The hallway continues and leads to another office room that also looks out onto the lightwell (from the west

side). Currently within this room you can see the former rear wall of the property within a cupboard (Figure 8). As the extension is a modern addition there is no historic fabric within this part of the building.



Figure 9: The third floor's front room

3.12 The front part of the building consists of the original envelope of the building and a later extension, which is older than the rear extension but still appears to be modern. Aside from the building envelope no historic fabric survives. The space now consists of a large office space (its internal wall is constructed of breeze blocks; Figures 9 and 10) with smaller offices within it, separated from the larger space by modern partitions. At the north east corner of the room is a door which leads to the front stairwell, toilets, kitchen and lift.



Figure 10: From the loft it is possible to see the materials of the wall below

- 3.13** The loft space is also entirely modern, as is the roof structure. It is clear that it has been replaced post 1971 (see Figure 11), most likely in the 1990s.



Figure 11: 81 London Street in 1971. The historic roof is still in place. © Historic England

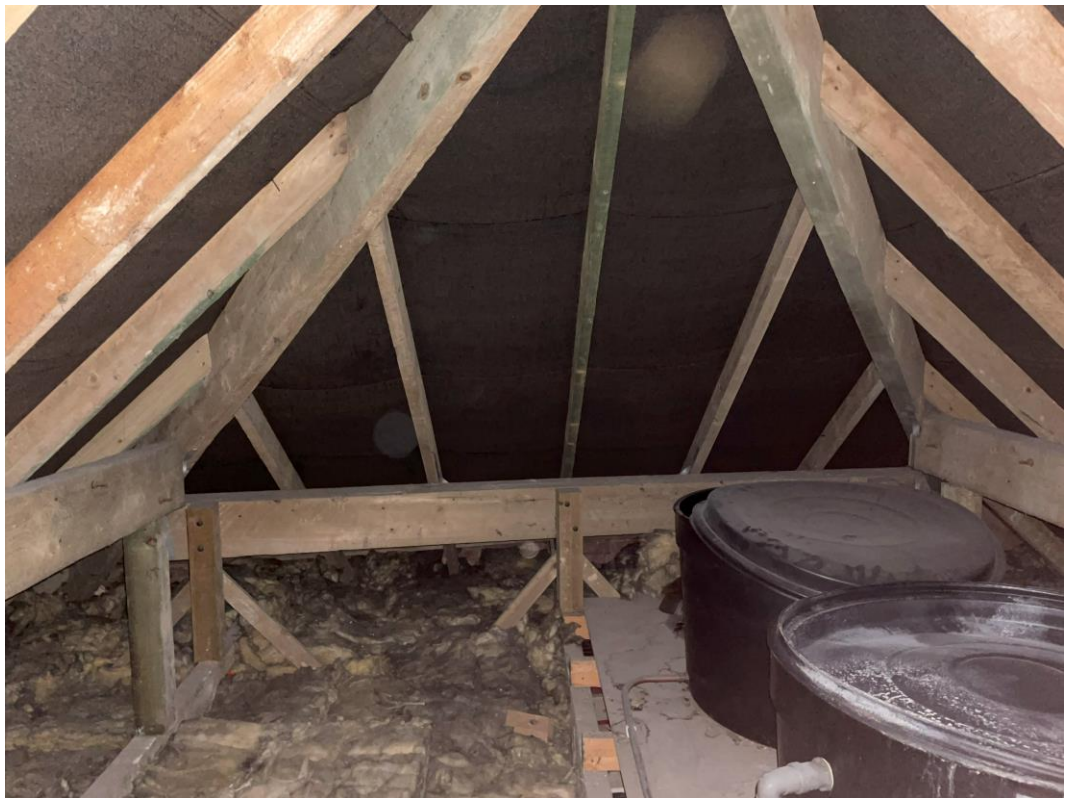


Figure 12: Modern roof structure

4. Statement of Significance

Assessment of Significance

- 4.1** This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF. In accordance with paragraph 194 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.
- 4.2** It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

81 London Street

- 4.3** 81 London Street is a building of architectural and historic interest, almost entirely as a result of the quality and form of its front elevation with its modest late Georgian detailing.
- 4.4** **Architectural Interest:** 81 London Street is of architectural interest. The interest almost entirely stems from the restrained late Georgian form, proportions and architectural detailing of the front elevation, particularly the upper floors which have undergone the least alteration. The symmetry, balance, and proportion of the upper floors allows for an appreciation of the classically inspired Georgian design, whilst the use of red brick and stucco are synonymous with the restrained Georgian style.

4.5 The modern shopfront is of negligible architectural interest as it is a modern addition, but it is generally in character with the period and style of the building.

4.6 The architectural interest of the building is greatly diminished by the numerous alterations to the building. These include the modern three storey rear extension, removal of historic roof structure and the almost entire removal of the historic interior of the building, including at the third floor level. There is so little historic fabric remaining behind the front elevation that the architectural interest of the interior and rear of the building is negligible.



Figure 13: Rear elevation of 81 London Street

4.7 **Historic Interest:** The building is of historic interest as it provides a visual and physical manifestation of the early 19th century development of the area. The building contributes to an understanding of the social history and development of Reading, demonstrating the introduction of upper class houses in the late 18th and early 19th century. It contributes to the understanding of past activity in the area and is illustrative, through its front elevation, of the upper class element of the social and economic character of this part of Reading from the c.1800.

- 4.8** 81 London Street is of additional historic interest as a 19th century residential property that was converted to commercial use in the mid-19th century. Its long association with Colebrook Butcher's is also of local historic interest.
- 4.9** The many alterations that have occurred to the property – including the loss of the historic shop front, interior and rear elevation – has greatly reduced the illustrative value of the listed building and therefore the overall historic interest of the building is greatly reduced. The historic interest of the interior of the building – including the third floor – is negligible.
- 4.10** However, the historic interest of the building is elevated when considered in the context of its group value with the other buildings of comparable date and form along the London Street.
- 4.11** **Artistic Interest:** Whilst the front elevation has some aesthetic value the significance of the grade II listed building is not derived from any specific artistic interest.
- 4.12** **Archaeological Interest:** Due to the loss of the interior and roof structure the building is not of archaeological interest.

5. Heritage Impact Assessment

- 5.1** This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter.

Proposed Development

- 4.13** As identified in the Introduction, the proposals amount to a change in use of the third floor of the listed building, from office space to residential.
- 4.14** The third floor will be converted to 3 residential flats, which will require the removal of partitions in some areas, and the further sub division of space in other areas. Additional kitchens and bathrooms will also be added to the third floor.

Impact Assessment

- 5.2** The change of use would be a wholly positive change that will reinstate/restore the original use to this floor and see for long term conservation/maintenance of the building.
- 5.3** As can be evidenced from the photographs provided in this report the third floor of the building is of negligible architectural and historic interest. The only historic fabric to survive is the envelope of the original building consisting of front elevation and part of the side elevations.
- 5.4** All partitions proposed to be removed are of a modern construction and of no heritage significance.
- 5.5** The historic plan form of the property has been lost, and the existing plan form is entirely modern. Therefore, the further partitioning of the space will have no effect on the heritage significance of the building.

- 5.6** The additional pipework and wiring required for the conversion to residential will be run within the modern walls, floors¹⁶ and ceiling and will not impact on any historic fabric.
- 5.7** There are no works proposed to the exterior of the building, including the front elevation.
- 5.8** For the reasons identified above, the proposed change of use would not result in any erosion of or harm to the special interest and significance of the listed building.

Summary and Policy Compliance

- 5.9** The proposed development is based on an understanding of the character of 81 London Street, its historic development and significance. The proposed development has been informed by this alongside desk based research and on-site assessment of surviving historic fabric with the proposals being specifically designed to provide the building with a long term viable residential use to the upper floor (that will see for the conservation of the listed building) while being sensitive to the significance of the assets.
- 5.10** As identified above, the proposals are found to preserve the significance of the 81 London Street. As such, it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 201-202 of the NPPF insofar as they will not result in any harm to, or loss of significance. There would be preservation for the purposes of Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990.
- 5.11** The proposals protect the significance of heritage asset and therefore accord with relevant local planning policy and objectives.

¹⁶ The floor structure at the front of the building appears to be modern but further investigative work could be conditioned.

6. Conclusions

- 6.1** This Heritage Impact Assessment presents an assessment of significance of 81 London Street. This is followed by an appraisal of the effects of the proposals upon this heritage asset with consideration given to local and national policy and guidance.
- 6.2** 81 London Street is a grade II listed building located on the east side of London Street. It was built c.1800 as a residential property, but by the mid-19th century the ground floor was used as a shop. The building has undergone significant alteration which has resulted in only the front elevation being of architectural and historic interest.
- 6.3** The proposals can be summarised as the change of use of the third floor of the building from office space to residential. The proposals will require various minor internal works including removal of modern partitions and the further sub division of other areas.
- 6.4** Section 5 of this report presents an assessment of the impact of the proposed works on the significance of the identified heritage assets and concludes that the proposals would not affect the heritage significance of the asset. This is due to the third floor essentially now being a modern construction and so the proposals will not result in any impact to historic fabric.
- 6.5** In summary, the proposed works to the grade II listed building are considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. There would be preservation for the purpose of the decision maker's duty under section 16 of the Planning (Listed Building and Conservation Area) Act 1990.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).¹⁷

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

¹⁷ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)