

Memo

WITHOUT PREJUDICE

To: Matthew Burns
From: Buju Can Cetin, Conservation Officer

Application Number: PL/24/0846

Application Type: Full planning permission

Address: Napier Court Napier Road Reading

Proposal: Demolition of existing buildings and erection of new buildings of 11 and 12 storeys, with amenity space at roof level (part indoor and set back), to provide 576 build to rent residential dwellings (Class C3) with residential amenity space, parking, landscaping and associated engineering works.

Summary

Objection (Acceptable in Principle) – Revisions Recommended – The proposed residential development's scale, massing, large footprint, and lack of open/green spaces would detract from the setting of the listed Thames Lido and dominate the public views. The proposed development should refer to the heritage data. There should be a clear statement of the composition of green and open spaces that have connections with King's Meadow and scale, respecting the Grade II Listed Thames Lido more. The proposed scheme should include flexibility options for the site's height and layout arrangement. As such, I conclude the impact of the proposal on the Kings Meadow Swimming Pool would be a moderate-low degree of less than substantial harm. Harm to the heritage assets to the south of Forbury Road would be at the lowest level, as included by the Heritage Statement. There is a high potential of design to balance this impact. Therefore, I would be happy to see revised design solutions for the application site.

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.

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character and appearance of designated Conservation Areas.

National Planning Policy and Guidance

The NPPF outlines government policy, including its policy in respect of the historic environment. Chapter 16 of the NPPF '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 EN3 ‘Enhancement of conservation areas’ of the Reading Borough Local Plan also requires that development proposals within Conservation Areas contribute positively to local character and distinctiveness.

Policy EN6 ‘New Development in a Historic Context’ also requires new development to **contribute to, respect and enhance the architectural and visual qualities of the historic environment** characterised by heritage assets.

“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.”***

In addition, Policy 11i directly relates to the development of Napier Court:

CR11i, NAPIER COURT:

*This area will be developed for residential. The design must avoid detrimental effects on the adjacent Thames Valley Major Landscape Feature, and **building heights should reduce from west to east across the site**. Land on the Napier Road frontage will be safeguarded for Mass Rapid Transit. Development of the Network Rail depot will be dependent on an alternative location at the railway triangle to the west of the centre becoming available. Development should take account of mitigation required as a result of a Flood Risk Assessment.*

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 lies between the railway line to the south and Napier Road to the north which separates it from King's Meadow, home of Grade II listed Kings Meadow Swimming Pool.

Given the location of the application site, below is the list of heritage assets which the potential impacts of the proposal would be on:

- **King's Meadow Swimming Pool – Grade II Listed Edwardian Lido**
- **Group of heritage assets to the south of Forbury Road**, including the Plummery Wall – (Grade II Listed wall dating mid 19th century), Reading Abbey Ruins (Grade I Listed, 1121 founded by Henry I), Abbey Gate (Grade I Listed), The Forbury Garden (Registered Park and Garden), Archway Connecting Forbury Gardens to Abbey Ruins. Including Retaining Walls Flanking Path to Abbey Ruins (Grade II*, mid 19th century), Wall between Forbury Road and Abbott's Walk to west of St James's Church (Grade II Listed, possibly circa 1840 or 1855), Reading Gaol (main building - former Her Majesty's Prison – Grade II Listed prison designed by George Gilbert Scott and William Boynton), Maiwand Memorial in Forbury Gardens (Grade II Listed), Anglian Cross in Forbury Gardens (Grade II Listed), Church of St James's (Grade II listed, 1837-40 by Augustus Welby Northmore Pugin), St James's Presbytery (Grade II listed, circa 1840 by Augustus Welby Northmore Pugin), St James Former School Buildings (Grade II listed dating 1876), Shelter at north-east corner of Forbury Gardens (Grade II Listed, possibly circa 1855), Assize Courts (Grade II Listed), Shire Hall (Grade II Listed) and Grade II Listed Houses at Nos 10, 11 and 12 on Abbot's Walk

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.

In addition to each listed building's individual historical and architectural interest, the application site lies opposite King's Meadow, where Grade II listed King's Meadow Swimming Pool (Thames Lido) is situated.

It should be noted that there is a historic continuous green/open link between the historic quarter to the south of Forbury Road, railway/railway line and King's Meadow.

As such, the development site should reflect and incorporate the physical form, morphological development, and historical development of historic green spaces that are high in heritage assets. Particular attention should be given to Thames Lido and King's Meadow, the latter of which is the setting of the grade II-listed swimming pool.

The locally listed Reading Bridge is located approximately 200m distant from the application site and Market Place/London Street Conservation Area is 250m (approx.) away.



The application site – Napier Court (outlined in yellow), listed buildings (purple starred), locally listed buildings (pink starred), and the Market Place/London Street Conservation Area (purple shaded)

Special historic and architectural interest of King's Meadow Swimming Pool

"934/0/10054 KING'S MEADOW ROAD 25-AUG-04 Caversham Lock King's Meadow Swimming Pool

II 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."

Impact of proposal upon heritage asset(s)

In principle, I would support the redevelopment of the application site for residential use. However, given its close physical relationship with the setting of Thames Lido – Kings Meadow – and the heritage asset group to the south of Forbury Road, I would like to raise some concerns about the scale, massing and built form of the proposed blocks, and I would like to make some suggestions for revisions.

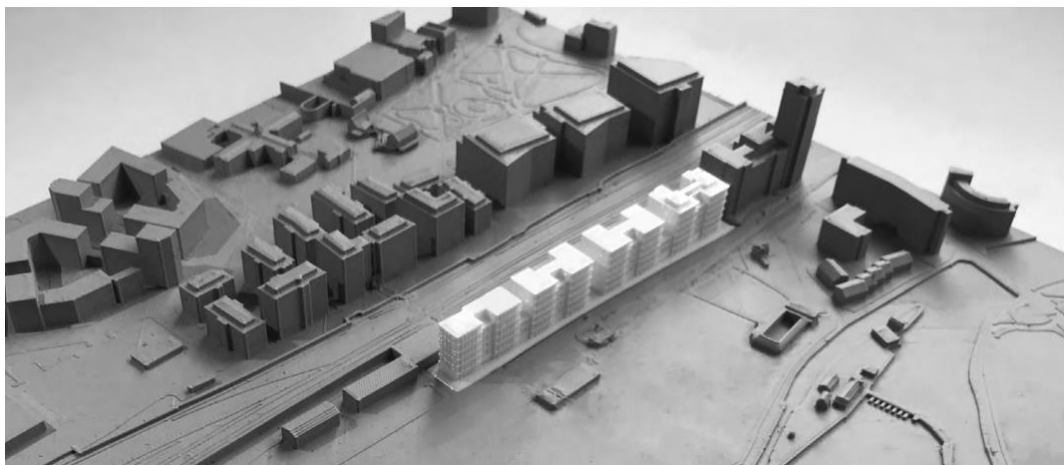
For the avoidance of doubt, during my assessment, I reviewed the following submitted documents:

- Application Form – Received on 03/07/2024
- Existing Site Location Plan - READ-5PA-ZZ-ZZ-DR-A-001000 P12 – Received on 12/07/2024
- Design and Access Statement (prepared by 5Plus) – Received on 03/07/2024
- Heritage Statement / Heritage Impact Statement (by HCUK Group, May 2024) - Received on 03/07/2024
- Townscape and Visual Appraisal (by HCUK Group, June 2024) – Received on 03/07/2024
- Planning Statement / Planning and Affordable Housing Statement (by Carney Sweeney, June 2024) – Received on 03/07/2024
- Proposed Plans, Elevations and Sections (many)

I noted the following:

- The proposal is for 11—and 12-story buildings, although the application form states 11-story buildings, while the description of the proposal states 11-story.
- Design and Access statement refers to the final design for the Napier Court based on existing and emerging townscape context, providing the following image/model (page 7),

which shows the Forbury Application (as oppose to the proposed white blocks), which has many design and heritage issues and, therefore, not been determined yet.



- Among the objectives of the proposed development, it is stated that the delivery team aims to create **“Respectful of Kings Meadow which offers an excellent amenity asset so the design must consider how it can benefit the residents”** (p. 7 of the Design Statement) Therefore, King’s Meadow is considered to be an open/green space for the residents of the proposal although is a recreational area of public use. It is expected that the new development will incorporate and connect this historic green space into the design respectfully.
- The statement also says, **“The design approach seeks to help redefine the edge to Kings Meadow. The proposal will introduce a positive impact to this Local Green Space as defined in the adopted Local Plan through the introduction of a well considered building line that offers improved visual amenity.”** (p.15)
- Under ‘Opportunities and Constraints’ the statement also states **“The existing office buildings do little to contribute to the sense of place within Kings Meadow or the arrival via the railway into Reading Station. (...) Existing massing is established with the Thames Quarter, Forbury Place and Kenavon Drive developments with an emerging scheme at Forbury Retail Park creating further opportunity along the railway corridor linking Kings Meadow with the town centre.”** (p. 24)
- ‘3.2 Urban Opportunities’ (p.25) mentions the following

“It aims to both benefit from existing urban assets, but also reinforce their connections such as;

 - **Opportunity for new pedestrian crossing over Napier Road**
 - **Connection with historic asset Thames Lido improving context and accessibility**
 - **Connection across Napier Road to playground and wider Kings Meadow**
 - **Completing an active ‘leisure loop’ to benefit from walking and cycling across Kings Meadow to the Thames path**
 - **Contributing to the development corridor, creating a positive walking and cycling route to and from Kings Meadow**
 - **Connecting the Central Reading Loop past heritage and commercial assets such as the Abbey Ruins, Forbury Gardens and the town centre shops.”**
- I understand that the proposed scheme would include new forms of green space. However, I do not see this in the design. I would prefer to read the existing urban grain does not have Forbury Retail Park Development, this should not be the reference as I

said previously, it has not been approved and there are many objections to its heritage impacts and design.

- The statement repeats that the proposal emphasizes the relationship between application site and King's Meadow: *"In approaching massing studies a mansion block typology **with open green spaces** has been considered the most beneficial approach and a number of renowned comparables are shown opposite."* (p. 27) However, I cannot follow this in the final design; no reference to Thames Lido or King's Meadow.
- There have been many pre app meetings, last of two reduces height and breaks up the massing: *"**The central 'pocket park' has been retained as a positive aspect** of the scheme. However one of the rear courtyards has had to be removed as a result of the car parking relocation. (...) · Further consideration and development was incorporated into the facade detailing to help articulate the frontage further, which ultimately can help **to break down the perception of mass from Kings Meadow.**"* (Pre-App Meeting 05). ***"The main change to the scheme was the detail of the facade and materiality. Finer detail features such as window shrouds, metal cladding panel strips and an increased range of brickwork have been introduced to help bolster the overall articulation. These newly introduced features along with the balcony details and alternating form are all developed to help break down the mass, particularly from the Kings Meadow viewpoints. On a more human scale, detailing and texture of the facades at close and medium range views helped to articulate the form and provide interest alongside a landscaped street scene with additional street trees to provide visual connectivity with the Kings Meadow."*** (Pre-App Meeting 06)
- I think I think to imagine/visualise this the Council needs views not from the middle of King's Meadow but from Napier Road itself – especially from the pavements as public routes. Because King's Meadow is not part of the application site but it has been presented as a open green space of the proposal. Most of the trees belong to King's Meadow in the images, which is a setting of Thames Lido, not part of the proposed development or application site.
- In addition, what would be perceived as is continuous horizontal block having only one opening in the middle. I think massing still needs to be reduced. Better design is required.
- 3.16 Post-Consultation states *"Covered Building Link The pocket park has had a covered walkway added to connect the two buildings. The structure will be a light metal structure, open on both side with mesh and climbers. This allows connectivity between the two blocks to allowing staff or residents to move between buildings without getting wet if it's raining."* – I do not understand the necessity of this – as the site would be residential, the movement between blocks should be minimal. I think some of these covered walkways should be removed.
- Below is one image in relation to 4.1 Introduction to Overview + Design Principles. The view below still includes Kings Meadow and Thame's Lido's car Park. The actual view should be from the pavement to see the real impact of the proposed blocks on the human scale. The image also shows the only open space that relates/provides a direct connection to King's Meadow; I think the massing should be removed to create more direct, legible open spaces -statement about open -green spaces- within the application site. The scale of the development is too large on both horizontal and horizontal aspects.



- About 4.3 General Arrangement Masterplan, I would prefer:

One pocket park is opposed to the entrance of Thames Lido – referring to the heritage assets entrance and connecting it to the site via greenery - , and two other small ones are at the west and east.

The proposed blocks defining the pocket park should be set back from the side and front so that they respect the scale and height of Thames Lido.

Remove the covered walkways to provide real open space with a green visuality and connection to Thames Lido and Kings Meadow. This would also help reduce the massing.

I would like to see the whole blocks occupy horizontal space as they have for the Ninth and Tenth Floor Site Plan (p. 47)

Building lines should refer to lines of historic paths, building lines, etc.



- Above are green/open visual relations between King's Meadow and the railway provided by the existing modest-scale buildings. The second openness is in line with the entrance to Thames Lido, and the last one is with the play area. Below is the proposed scheme with only one openness, not referring to anything existing but just showing the middle of the blocks. There is no clear continuity or relationship between the application site and King's Meadow or the scale of Thames Lido. We cannot see the composition of the proposal outside of its boundaries.



- Therefore, in terms of Landscape Strategy, I do not support the amount of green space and its weak relationship with King's Meadow and Thames Lido. Although I find it too much to use a mix of many colours for the buildings, I would not object to the proposed materials as I see the scale and height of the buildings as well as the built form has more impact than these.
- I think there is again too many proposed materials for hard surfacing. I think at least two of them can be removed (either P5 or P9), (either P4 or P6).



(p.102)

- Regarding the Contextual Master Plan, I appreciate the intent of creating new pedestrian linkages, but I think the proposed one is too weak. As I already suggested, more open green transitions are required to say that the proposed scheme pays attention to King's Meadow and Thames Lido. Anyone should be able to see that when they look at the master plan or proposed site plan. (page 111)

- I see problems with the Illustrations again – the existing play area is shown/perceived as a part of the proposed scheme, which it is not. (see page 113)

View Position



- This play area already exists, and there is no direct green/pedestrian link from the blocks to this play area in terms of open/green spaces. There is a Kings Meadow Crossing proposed but this crossing uses the existing pavement and road not adding any space from the application site. A few trees do not provide this impression.
- I think the setting of Thames Lido would be negatively impacted by the imposing continuous massing of the proposed development and probably its shadowing on King's Meadow. Could the agent confirm the latter one, as I cannot see it (shadow impact) in the Heritage Statement?
- I appreciate the submitted Heritage Statement (it is brief and to the point) and mostly agree on the significance and impact assessment. This statement says *"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."* I would like to add that the existing buildings have little contribution to the setting of the listed lido due to their modest scale and plain architecture; they do not dominate the street or area and blend well within the opposite King's Meadow in terms of built form and urban grain. When compared to the proposed, there is a high difference between the two.
- This is included within the summary of effects (in Heritage Statement): *"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.” Change means impact - replacement of existing human-scale modest buildings would result in additional harm to the setting of the heritage asset. I find this harm at the lowest level and could be balanced with some public benefits. However, there is also a need for further consideration to reduce the impact and deliver environmental benefit by creating well-designed figure-ground relationships (open built-up) and using green links that respect the historical, recreational public green space and lido within it. The problem would be the gap and surface created by the scale and density of the proposed buildings. The impact would be limited but noticeable. Less than substantial harm at moderate-low level.

- There is no direct impact on Forbury Gardens and listed buildings to the south of Forbury Road; this would be at the lowest level. Forbury Retail Park has not been developed yet, and there would be so little visual impact of additional built forms on Forbury Gardens, Reading Gaol and other listed buildings.
- Lastly, I would like to add my conservation perspective on the submitted Town and Visual Appraisal. I agree with **“3.1 (...) These linear blocks would be articulated into a series of linked building elements that would be perceived of taller mansion blocks of a similar height and character and lower linked buildings.”** and The appraisal confirms that **“6.15 The magnitude of change is high. With a medium sensitivity, recreational users are judged to experience a major visual effect that is neutral overall.”**
- 3.5 **“The proposed development would reinforce the tree-lined character of Napier Road and enhance the green infrastructure to the public realm with hedge planting and enhanced flowering lawns to the verges. A permeable boundary to Napier Road will enable views into the landscaped courtyard.”** I find this (hedge planting, flowering lawns, one landscaped courtyard and one pedestrian linkage) to be too small compared with the scale of the proposal.
- 5.54 **“(…) The magnitude of change is high and with a low sensitivity, the proposed development is judged to result in a moderate and beneficial effect on the built character of the Site.”** Given the consideration that has been given to the emerging scheme, I understand the logic behind this, but as I compare it with what is existing and how the design responds to the existing historic green and listed building, I disagree.

Overall, I would expect the proposed development would refer to the heritage data. There should be a clear statement of the composition of green and open spaces having connections with King’s Meadow and scale respecting more to the Grade II Listed Thames Lido. The proposed scheme should include flexibility options for the site's height and layout arrangement. As such, I conclude the impact of the proposal on the Kings Meadow Swimming Pool would be a moderate-low degree of less than substantial harm. Harm to the heritage assets to the south of Forbury Road would be at the lowest level, as included by the Heritage Statement. There is a high potential of design to balance this impact. Therefore, I would be happy to see revised design solutions for the application site.

Conservation response

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

