

Memo

To: Matthew Burns
From: Buju Can Cetin, Conservation Officer
Date: 19/11/2025
Re: Conservation Officer response

Application Number: PL/19/0549

Application Type: Full planning permission

Address: Shillingford House 78 Oxford Road Reading RG1 7LJ

Proposal: Demolition of existing three storey building containing 4 x ground floor retail units and 4 X flats to first and second floors and erection of a six storey building containing 3 x ground floor retail units and 13 x flats (6 x 1 bed, 6 x 2 bed and 1 x 3 bed) with associated enclosed communal areas, bin store, services room and cycle storage facility (amended description)

Summary

Objection – *Less than substantial harm on the significance of the conservation area, setting of the facing listed building, and the BTM (Providence Chapel)*

The proposal, due to its scale, height, forms, design, and appearance, would be a dominating, competing, and distracting element within the conservation area. The proposed development would have less than substantial harm to the significance of the conservation area, including the setting of the listed building and views from the entrance of the conservation area.

Whilst I can argue that there would be no heritage benefit, the final decision and planning balance is planning officer's to make.

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. 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.

Section 66 of the Act also requires 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 (2024) 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraph 207 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 208 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 212 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 213** 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 215 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 weighed 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 requires that development proposals within Conservation Areas contribute positively to local character and distinctiveness. This policy states, *"Development proposals within Conservation Areas must make a positive contribution to local character and distinctiveness. Positive consideration will be given to proposals which take opportunities to enhance the character of conservation areas."*

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."

Castle Hill/Russell Street/ Oxford Road Conservation Area Appraisal (2020) is also a material consideration in determining applications for development.

Other

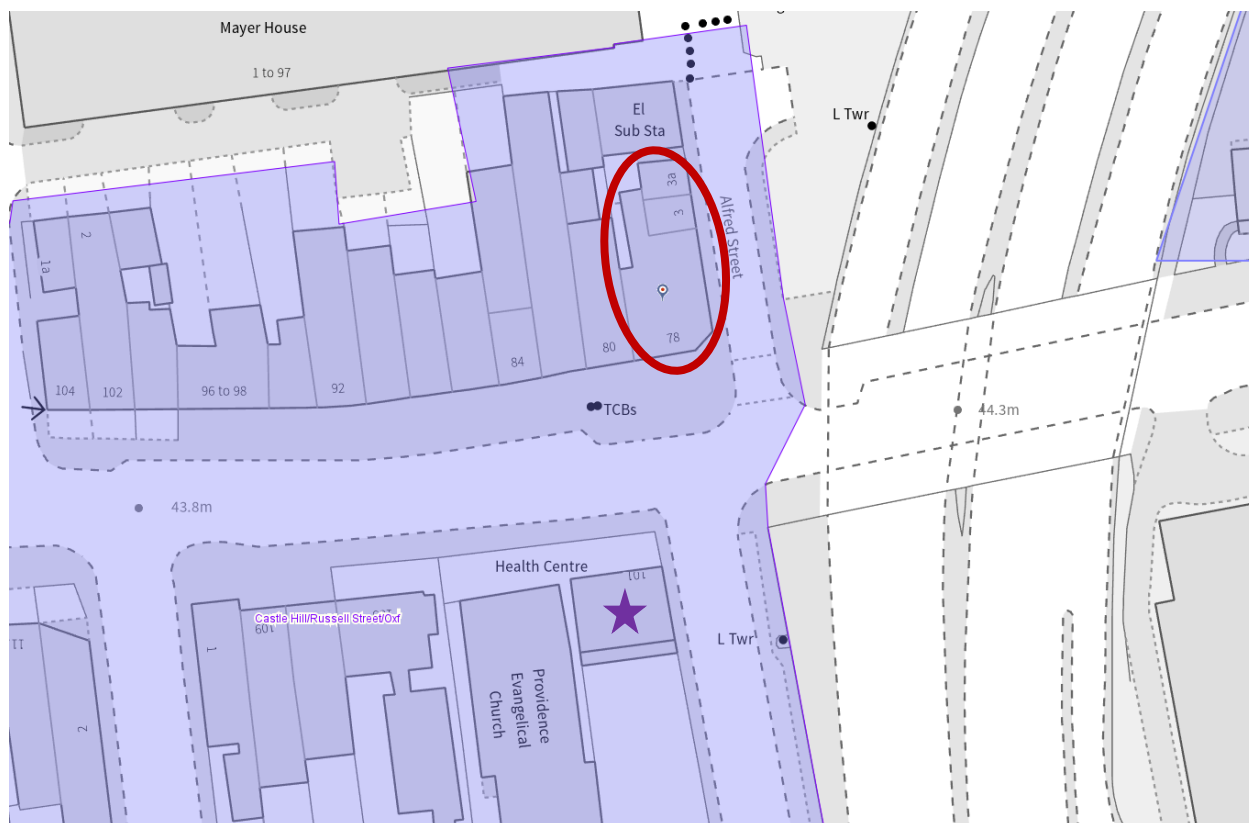
Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for Planning Permission and Listed Building Consent.

English Heritage's "Conservation Principles" provides policy and guidance for the "sustainable

management of the historic environment”.

Relevant heritage assets and Significance

The application relates to a three-storey corner building located within the Castle Hill/ Russell Street/Oxford Road Conservation Area. As illustrated below, the application site is situated at the entrance of the conservation area when approaching from the east. It constitutes a historic, continuous and consistent visual environment with the listed building, Rox Borough House at 101 Oxford Road, building of townscape merit – Providence Chapel at 103 Oxford Road and a terrace of Victorian buildings attached to the subject building.



The application site (circled in red) within the Castle Hill/Russell Street/Oxford Road Conservation Area (light purple), the facing listed building is starred

Summary of special interest of the Oxford Road Character Area, the conservation area appraisal states *“The Oxford Road is one of the earliest roads leading out of Reading, south of the River Thames, serving as the primary route to Pangbourne and on to Oxford. (...) Today, this is a vibrant area with an active pedestrian and vehicular traffic route, well known for its array of independent shops which reflect the area’s diverse communities.*

The 2-and 3-storey streetscape is a mix of impressive Georgian terraces and stand-alone houses interspersed with Victorian shops and houses along the route.

Along this half-mile route of 19th century heritage buildings on the Oxford Road, forty of the addresses are listed, either singly or collectively as a terrace. (...) Solid Arts and Crafts influences are apparent in the many attractive polychrome brick and terracotta façades in the area.”

Regarding the inclusion of the northern side, where the subject building is located, of Oxford Road, the following should be noted:

*“The area between Alfred Street and Eaton **Place evidences the early 19th century link** between the town centre and Oxford Road, and with the south side of Oxford Road between Howard Street and Russell Street. **The local distinctiveness of this commercial***

corridor includes significant buildings, such as the Providence Chapel (...)"

Dated to the inter-war period (possibly between the 1930s and 1950s) of Reading, the subject building sits at an angled corner at the intersection of Oxford Road and Alfred Street. Not only adding another historic development layer to the richness of the conservation area and Oxford Street, but also its grey brick construction with red brick dressings reflects and contributes to the unique brick pattern of Reading, which is also seen on many listed buildings in the town. With its subtle contrast brickwork on its facades, windows set within segmental brick arches with the larger ones on chamfered corners and its flat parapet, it exemplifies the typical decorative touch of its time and the functional design of mixed-use commercial and residential property common in town centres.

The historic photographs and map regression suggest that the building is one of the best architectural representations and replacement of a Victorian end-of-terrace building on Oxford Road. As such, any proposed development for this site should consider architectural features of the building, its position at the entrance of the conservation area, its scale and height, consistent with the facing listed building and building of townscape merit, as well as historic terraces along Oxford Road. It should also be noted that the conservation area is on 'Heritage at Risk' list of Historic England, requiring sensitive approach.



ABOVE - Aerial view westwards over Reading town centre, 1922. The line of Broad Street and Oxford Road runs diagonally across the photograph, and in the foreground are Howard Street, Soho Street, Hosier Street and Hope Street. The timber-yard of Warwick Brothers in Soho Street is visible, as are the corn stores of Dunlop and Son at the corner of Oxford Road and Howard Street, and "Tibble's Model Bakery" at the corner of Alfred Street opposite. The newly-built Central Cinema is prominent in Friar Street, and other large buildings include the Vaudeville Cinema in Broad Street, the Palace Theatre, Cheapside, the Royal County Theatre, Friar Sreet, and West Street Hall. 1920-1929 : photograph stamped "Copyright: Reading Museum and Art Gallery." There are other prints at Dynix 1242040 and 1242042 (from the Reading Library's Online Archive)



The shop and bakery of F. Tibble, 76 Oxford Road, Reading, c. 1920. Round the corner in Alfred Street, eight delivery vans wait with their drivers. The bakehouse has "Tibble's Model Bakery" painted on the side. 1920-1929: copy of an older photograph (from the Reading Library's Online Archive)



Oxford Road, Reading, looking eastwards, 1965. On the north side, No. 84 (F. J. Cotton, dry cleaner); No. 82 (Album Brothers, tailors); No. 78 (K. C. Burdett, with ice cream sign); the corner of Alfred Street; No. 76 (Reading Motor Accessories). 1960-1969 : photograph by R. J. Hart (from the Reading Library's Online Archive)

The Official listing description of the Grade II Listed **Rox Borough House, 101 Oxford Road**, which includes the historic importance of Oxford Street, is read below.

Summary

A detached house, built around 1859, converted to offices.

Reasons for Designation

Rox Borough House, 101 Oxford Road, is listed at Grade II for the following principal reasons:

Architectural interest:

** as a mid-C19 building which contributes to the character of an architecturally varied historic streetscape.*

Group value:

** the building is in close proximity to a large number of listed buildings and forms part of a strong historic grouping.*

History

Until the C19, most of the land west of Reading town centre was open farmland crossed by two ancient routes passing through the town from London to the West Country. Today, the northern of these two roads is named Oxford Road, while the southern is named Castle Street/Castle Hill/Bath Road. Inns and some isolated dwellings probably existed on these roads before the C18. Fortifications were built throughout the area by Royalist forces garrisoned in the town during the Civil War with some of the earthworks surviving into the early C19.

From the early C18, development slowly began to spread westward along Castle Hill/Bath Road and Oxford Road. John Rocque's Map of Berkshire (1761) depicts ribbon development along Castle Hill/Bath Road extending as far as the junction with Tilehurst Road, and individual houses within grounds along Oxford Road about as far as the present-day location of Russell Street. More comprehensive development of the area began in the early C19 and progressed gradually over the 100 years. Development spread further along Castle Street/Castle Hill, with some of the earlier buildings depicted on Rocque's map seemingly replaced. North-south link roads also were laid out across the market gardens that previously existed between Oxford Road and Bath Road. Terraced housing was erected in considerable quantities during the first half of the century to cater for a variety of social groups.

101 Oxford Road was constructed in approximately 1859 during the westward expansion of Reading's inner suburbs along Oxford Road. By the 1860s the building had been named Zinzan House, after the former owner of the market gardens in the area, Mrs Zinzan. The building's name changed to Roxburgh House in the 1890s. The name appears to have fallen out of use by the late C20.

The building appears to have experienced very little external alteration since it was built. An iron veranda appears to have been installed across the rear elevation of the house by 1879 although it is unclear whether the extant veranda is historic. The original front boundary treatment has been lost and replaced with modern iron railings, and the front garden is paved. The eastern boundary wall onto Howard Street appears to have been partially rebuilt in approximately 2009.

Details

A detached house, built around 1859, converted to offices.

MATERIALS AND PLAN: the building is of dark red brick with stone and stucco dressings. There is an iron or steel veranda to the rear and iron railings around the basement windows. The roof covering is slate with timber eaves blocks and soffit. The building is of two storeys plus basement.

EXTERIOR: the principal elevation faces north and is symmetrical, with a centrally-placed doorway on the raised ground floor flanked by two six-over-six sash windows within moulded architraves and three six-over-six sash windows on the first floor under gauged-brickwork flat arches. The two basement windows, partially visible from the street, are enclosed by iron railings with honeysuckle ornament. A flight of four stone steps leads to the main doorway which comprises a four-panelled door with a rectangular fanlight above, set within a moulded door surround with a bracketed hood. There is a stucco plat band across the elevation at first-floor cill level. There are stone kneelers (moulded brackets) to either gable end wall and timber battens along the soffit of the pitched roof. The two chimney stacks are positioned on the gable end walls.

The brickwork of the east, south and west elevations is in Flemish garden wall bond. The east elevation onto Howard Street is blank, aside from a single round-headed sash window placed centrally at second-floor level. The southern elevation contains two six-over-six sash windows on the ground floor and two six-over-six and one two-over-two sash windows at first-floor level. There is a plain iron or steel veranda across the length of the rear elevation.

SUBSIDIARY FEATURES: C19 brick walls in Flemish garden wall bond run along the east and west boundaries of the front garden. A taller brick wall, recently rebuilt but possibly reusing historic bricks runs along the eastern boundary of the rear garden.

Impact of proposal upon heritage asset(s)

I noted this application has a long history and many revisions, and the final judgement is the planning officers to make. However, I would like to comment on the following aspects of the proposed development, which I think needs to be reconsidered.

Demolition of the existing building: This is an unlisted building from the inter-war period of Reading within the highly vulnerable conservation area (which is at risk). There is a general view that buildings that are not dated to Georgian and/or Victorian times can easily be altered or replaced, even if they are within the conservation area and protected under the Act. Rather than having a limited perception of historic elements of the environment, the context of the building and its place within Reading should be considered. As I already explained in the significance part of this memo, the building features polychrome brickwork, distinct to Reading and rare in terms of grey bricks. The demolition would result in this value and harm the significance of the conservation area. When there is a demolition within a conservation area, what is proposed should contribute more than what is replaced. The proposal should have some patterns on its brickwork that would reflect the Reading's architecture.

Design, Architecture and Appearance: Directly related to the issue above, if there is a new building proposal within a conservation area, there are three approaches: mimic the historic, contrast with the historic and incorporate these two. However, creating a sympathetic or acceptable architecture is more complicated when there are multiple heritage assets to be impacted and when there is additional massing or height that cannot blend within the existing historic development pattern or character of the conservation area.

Nevertheless, there is still one important principle that any new element in the historic environment should reflect its time if it is not about the retention of a previously lost element. In this regard, the proposal would have similar building lines and forms on its Oxford Street façade, corner, and a very small part on the Albert Street elevation which could be argued to be acceptable.

If demolition is the only option, there should be more architectural effort to make the proposed building acceptable, as this site would welcome the public entering the conservation area.

Scale, height, and articulation of masses: The proposed development would add considerable massing, resulting in some harm. Whilst there is breaking of masses, given the building would face 2 2-storey listed dwellings and 3 3-storey (?) chapels, at the entrance of the conservation area, the proposed setback distance from Oxford Road should be reconsidered.

The additional two storeys would align with the middle of the first windows on the lower ground floors that still have an over-dominating, overbearing, out-of-scale impact on the setting of the listed building, character and appearance of the conservation area. In addition, because the articulation of masses is created horizontally, there would be a more dramatic impact when perceived with its Albert Road elevation. This would also harm the setting of the listed building and significance of the listed building.

Although it is hard for me to see any public benefit of the proposal, it is clear that the proposed development would have less than substantial harm to the character and appearance of the conservation area, including the setting of the listed building and views from the entrance of the

conservation area. The proposal would result in value loss, and the replacement building's design quality fails to make a positive contribution to the local character and distinctiveness.

It would not meet criteria (a) and (b) of EN6. As such, I would leave the final decision made by the planning officer or planning committee, although Paragraph 212 of the NPPF states "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 the more important the asset, the greater the weight should be)."

Lastly, it should be noted that the submitted heritage statement is dated 2018 which was not prepared for the latest proposed scheme. I would expect an addendum for the latest scheme.

This application should be revised according to the following (as an example):



- Retain the outer walls of the existing building – red area OR replicate it with grey bricks same as existing
- Set back the proposed floor addition – do not cross the yellow dotted area – respect the scale of the conservation area and the listed building-roof garden still can be considered
- New massing – black area – should have some contemporary elements that would create contrast with the retained building part
- New design to incorporate the retained part and new massing by reflecting historic and contemporary elements. Simple but attractive, adding value and architectural distinctiveness
- I find railings and parapets unnecessarily dominating as they are continuous elements on all elevations.
- Consider some natural elements to soften the appearance.

Conservation response

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

Contact details

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