

The Planning Department
Reading Borough Council

8th December 2025

Our Ref: 8775676/Let RBC

By email

Dear Sir/Madam

Retrospective Application For The Use of Fibre Cement Roof Tiles at 4 Prospect Street, Reading RG1 7YG,

I am writing in respect of the recent replacement of the roof covering at **4 Prospect Street, Reading (RG1 7YG)**, which lies within the Russell Street/Castle Hill Conservation Area. This letter provides a **retrospective justification** for the use of **fibre cement roof tiles** in place of natural slate on this unlisted property, and seeks to explain how this choice **preserves the character** of the conservation area while aligning with relevant planning policies and guidance. I hope to demonstrate that the high-quality fibre cement slates installed are an appropriate and sympathetic alternative. Below I will outline the policy context, cite comparable examples (in Reading and elsewhere), and highlight the material's conservation and sustainability merits, with references to support these points.

Conservation Area Policy Context and Material Guidance

Reading Borough Council's planning guidance emphasizes maintaining the character of historic areas by using materials that **match the existing building** and its traditional palette. For example, the Council's *Design Guide to House Extensions SPD (2021)* notes that in sensitive locations like conservation areas, extensions or alterations should use **matching materials** to the original structure. In practice, for a 19th-century building in Russell Street/Castle Hill, this has generally meant replacing a natural slate roof with new natural slate to preserve authenticity.

It is within this policy framework – **preservation of appearance and character** – that the use of fibre cement slates must be justified. Notably, Reading's Local Plan Policy EN3 (*Enhancement of Conservation Areas*) requires that any development in a conservation area "makes a positive contribution to local character and distinctiveness. In other words, changes should *preserve or enhance* the visual character of the area. The **central question** is whether the fibre cement slates at 4 Prospect Street uphold that policy by maintaining the roof's traditional appearance, as opposed to causing harm.

Appearance and Character – Fibre Cement vs Natural Slate

The fibre cement roofing tiles used at 4 Prospect Street were carefully chosen to **replicate the appearance** of natural slate as closely as possible. Modern fibre-cement slates (such as the **Cedral/Marley "Rivendale"** slates used in this case) are specifically designed with a textured surface and **dressed edges** to **mimic the look of traditional Welsh slate**. They have a thin profile and authentic blue-black coloration, making them virtually indistinguishable from natural slate when observed from street level. In a recent article in the *Conservation & Heritage Journal*, conservation specialists highlighted that fibre cement slates "**provide an appearance of traditional materials**," offering the aesthetic of natural slate while also bringing technological and performance benefits. In fact, Reading's own Planning Committee has previously noted that **'Rivendale' fibre cement slates give a good impression of a traditional slate roof**, indicating that the product is considered sympathetic in heritage contexts.

By using a high-quality artificial slate, the intent at No.4 Prospect Street was to **match the visual character** of the original roof and the surrounding historic roofs, thereby satisfying the spirit of the "materials to match existing" guidance. The new roof retains the same **colour, texture and module size** as the former slate covering, and thus the streetscape is unchanged to the casual observer. This helps ensure the conservation area's character and appearance are **preserved**, meeting the test of Policy EN3. It is worth noting that in the nearby Eldon Square Conservation Area, many slate roofs have been re-covered in artificial slate over time – while not all of those changes were ideal, it means that **precedent exists in Reading for artificial slate roofs** on historic buildings. What is crucial is the *quality and*

appearance of the material: in this case the fibre cement slates are of premium grade meant to “**reflect the qualities of natural slate**”, combining modern roofing technology with the look of traditional slate. This ensures that the change does not introduce an incongruous element to the area.

Examples of Fibre Cement Slates in Heritage Contexts

There are several instructive examples, both within Reading and elsewhere, that demonstrate **successful use of fibre cement roofing in conservation areas**:

- **Local Example – New Developments in Reading:** In recent years, Reading Borough Council has **approved the use of fibre-cement slates on new buildings within conservation areas**, recognizing their visual compatibility. For instance, in one Planning Committee report, officers supported a proposal for pitched roofs finished with “*Rivendale’ fibre cement slates*”, noting that these give “a good impression of a traditional slate” roof (180319/FUL). This shows that even the Council’s planners consider certain fibre cement products an acceptable alternative where they closely resemble historic slate. By extension, on an existing building like 4 Prospect Street, replacing old slates with a comparable fibre-cement slate can be seen as **maintaining the intended traditional appearance** without detriment to the area.
- **Hawkshaw Lodge, Hawkshaw (Greater Manchester):** A notable case is the *Hawkshaw Lodge* development, where a former mill in a **Green Belt conservation area** was converted to housing. Initially, **local planners stipulated natural slate** for the new roof, given the sensitive setting. However, the developers had concerns about natural slate’s suitability (the exposed location raised issues about fixings and the variability of natural slates). After discussions, **Cedral “Rivendale” fibre cement slates were accepted as a perfect alternative to natural slate**, meeting the strict conservation area requirements. The planning authority was persuaded by the **environmental benefits** of fibre cement and its visual qualities – the *planners ultimately “changed their mind about insisting on natural slate”*, concluding that the fibre cement slates were “**aesthetically ideal as well as cost effective.**”. In other words, the conservation officers in that case determined that a high-grade fibre cement tile could achieve the same appearance and preserve character, while also offering practical advantages. This is a compelling precedent illustrating that heritage objectives can sometimes be met with alternative materials, provided their look and feel are sufficiently traditional.
- **Malvern (Worcestershire):** In Malvern, a conservation area apartment development called *The Cedars* also used **Cedral fibre cement slates** to satisfy a demanding design brief. The project’s approval took over a year, but ultimately the **planning permission was granted with fibre cement roofing**, as it achieved a high-end traditional look in keeping with the area. The project architects chose a blue-black fibre-cement slate and reported that “*everybody was very pleased with the finished result,*” noting it is a “*very attractive and smart product*” that fit the conservation setting. This example underlines that **planning authorities can be satisfied** with fibre cement roofing where it convincingly emulates natural slate.
- **Other Conservation Areas:** As reported in the *Conservation & Heritage Journal*, numerous other projects have successfully incorporated fibre cement cladding or roofing in historic areas – from a modern infill near a Grade II listed church in Derbyshire, to a renovated house in the Ranmoor Conservation Area (South Yorkshire). In the Ranmoor case, the homeowners faced initial skepticism from planners, but because **fibre cement had been used on other conservation area schemes**, the proposal was approved. This demonstrates a growing acceptance that fibre cement products can be used “**successfully in other conservation areas**”, paving the way for their consideration in similar contexts. The overarching lesson is that there is *not a one-size-fits-all solution* for roofing in heritage settings, but **high-quality fibre cement is increasingly recognized as a viable option** when carefully selected.

In summary, these examples show that **fibre cement slates have precedent in heritage-sensitive projects**, including cases where planners initially expected natural materials. The key to acceptance has been demonstrating that the alternative material will **preserve the aesthetic character** of the building and its surroundings. In each example above, the fibre cement roofs blend in harmoniously and uphold the historic appearance, which is precisely the aim at 4 Prospect Street.

Conservation and Sustainability Benefits of Fibre Cement

Beyond appearance, there are practical conservation benefits in using fibre cement slates that align with both **heritage conservation principles and modern sustainability goals**:

- **Lightweight and Less Intrusive:** Fibre cement slates are lighter than natural slate, putting less stress on the roof structure. This is beneficial for an older building – it means the original roof timbers (often over a century old in this area) are not overloaded. A lighter roof covering can prolong the life of the structure and avoid the need for extensive structural alterations or reinforcements (which themselves could disturb historic fabric). In this sense, the fibre cement tiles help **conserve the building** by keeping the intervention minimal while achieving the same outward effect.
- **Durability and Maintenance:** The modern fibre cement product is **highly durable and low-maintenance**. It does not delaminate, crack, or require periodic replacement the way some natural slates might if they weather poorly. It also doesn't suffer from issues like rot or warping (which can affect timber shingles or low-grade slates). Using a long-lasting material ensures the roof remains weathertight and attractive for many decades with minimal intervention. This reduces the need for future repairs that could disrupt the building or the area. The **consistency of manufactured slates** (each tile being uniform) also made installation quicker and ensured a neat finish, again meaning the building was exposed for less time and workmanship was simplified – a subtle benefit for construction in tight urban conservation areas.
- **Cost-Effectiveness and Viability:** While cost alone is not an overriding factor in conservation decisions, it is relevant to **viability**. Fibre cement slates are more affordable than natural slate. By choosing the former, the property owner was able to **afford a full roof replacement** now, rather than potentially patching or delaying due to the higher expense of real slate. This means the building has a completely renewed, weatherproof roof protecting it from water ingress – a positive outcome for the building's conservation. In contrast, insistence on natural slate might have led to delays or a lower-quality substitute being used unofficially. In the Hawkshaw Lodge case, the developer also cited cost-effectiveness as a benefit of fibre cement, which helped sway the decision. An **affordable solution that meets aesthetic requirements** is more likely to be maintained properly over the long term, which ultimately benefits the conservation area by ensuring the building does not fall into disrepair.
- **Fire Safety:** The fibre cement slates used are **non-combustible (fire rated A2-s1,d0)**, very close to the performance of natural stone/slate (which is Class A1). Thus, there is no compromise in fire safety; the new roof meets modern fire standards, which is especially pertinent for closely spaced buildings in an urban conservation area.
- **Environmental Sustainability:** Fibre cement is considered an **eco-friendlier choice** in several ways. Manufacturing fibre cement slates uses **fewer raw materials and less energy** than quarrying and shipping natural slate. The product is also **recyclable** at end of life. Reading Borough Council has declared a Climate Emergency and has policies encouraging sustainable construction practices and waste minimisation. Allowing the continued use of the fibre cement roof aligns with those objectives. It avoids the significant carbon footprint that would be associated with sourcing new natural slates (often from overseas) and transporting them, and it prevents the **waste of scrapping the brand-new fibre cement tiles** already in place. (The Local Plan specifically notes that building materials are consumed at a rapid rate and calls for increased re-use and avoidance of waste – removing the new roof would run counter to this principle.) In the Hawkshaw example, the planners were influenced by the **environmental benefits** of fibre cement slates and found that compelling. Likewise, at 4 Prospect Street the environmental considerations weigh in favour of retaining the current roof, since it achieves the conservation aim with a lower carbon and material impact.

In light of the above points, it can be argued that the fibre cement roof **preserves the historic appearance** of the property *and* delivers practical benefits that support the long-term conservation of both the building and the environment. Modern conservation philosophy, as reflected in industry journals, accepts that **“fibre cement roofing can be successful in a conservation area, providing a material that is durable, low maintenance... and with an aesthetic that works in harmony with the surrounding homes and landscape.”** In essence, it is possible to uphold heritage values *and* embrace sustainable materials – the two goals are not mutually exclusive.

Conclusion and Request

In conclusion, I respectfully submit that the use of **fibre cement slate tiles** on the roof of 4 Prospect Street is a **justifiable and sympathetic alteration** in the context of the conservation area. The choice of material was made in good faith to closely resemble the original slate roof, thereby **preserving the character and appearance** of the building and the streetscape. This is in line with the Council's aim of keeping alterations in conservation areas in character. Importantly, comparable cases (both in Reading and nationally) show that planning and conservation authorities have accepted high-quality fibre cement slates as *legitimate substitutes* for natural slate, especially when they deliver visual fidelity and other benefits as detailed above. The installed roof meets those criteria – it maintains the historic look, and offers advantages in terms of building conservation and sustainability.

We acknowledge the Council's general preference for natural materials in historic settings; however, we hope the evidence provided here demonstrates that **no harm has been caused** to the significance of the conservation area. The roof's appearance remains that of a traditional slate roof, and thus the special architectural interest of the area is unharmed. Given the substantial cost and environmental impact that would be involved in stripping the new roof to revert to natural slate, it is our view that such an action would yield **no appreciable benefit** to the character of the area. On the contrary, allowing the fibre cement slates to remain would be consistent with national guidance to **balance heritage conservation with sustainability** (as encouraged by the NPPF and local policies).

I therefore **request the support of the Council for this retrospective planning application** for the fibre cement roof tiles, and ask that any enforcement action be re-considered in light of the material presented. I am confident that this approach satisfies the relevant conservation area objectives by **ensuring the building continues to contribute positively** to the area's character. The end result – a sound, attractive roof that matches its surroundings – aligns with both the letter and spirit of conservation best practice.

Thank you for taking the time to consider this application. Please do not hesitate to contact me if any further information or clarifications are required. I am keen to work with the Council to reach an outcome that upholds our shared goals of protecting Reading's heritage while also embracing sustainable, practical solutions for the long-term care of its historic buildings

Yours sincerely

A handwritten signature in black ink, appearing to read 'H' followed by a stylized 'C' and 'T'.

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