

Memo

To: Jonathan Markwell
From: Buju Can Cetin, Conservation Officer
Date: 30/09/2026
Re: Conservation Officer response

Application Number: PL/26/1121

Application Type: Full planning permission

Address: 138-141, 142-143 & 144 Friar Street, Reading, RG1 1EX

Proposal: Phased redevelopment of the site involving the demolition of No's 138-141 & 142-143 Friar Street, partial demolition of No. 144 Friar Street and erection of a basement, 6-storey and rooftop plant building for purpose-built shared living accommodation (co-living) (Sui Generis), together with the partial retention of No. 144 Friar Street for flexible Class E(a)-E(e) uses.

Summary

Objection – Revisions are recommended

Although the proposed development would result in lower harm compared with the previously approved scheme, due to the demolition of the 1920s extension of the non-designated heritage asset and the proposed design of the replacement section not integrated into the historic fabric of the asset, further revisions are suggested. The harm to the asset itself would be higher, while the harm to the setting of listed buildings would be lower. Therefore, I leave the final judgement to be made by the planning officer in accordance with Policies HE4, HE5, HE6, and HE7 of the NPPF and EN1, EN4 and EN6 of the Reading Borough Local Plan.

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 66 of the Act 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 (2026) outlines government policy, including its policy in respect of the historic environment. Chapter 20 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies securing the conservation of heritage assets and making decisions on development proposals.

Policy HE4: Securing the conservation of heritage assets recognises heritage assets as irreplaceable resources and requires their conservation, including any contribution made by **their setting** in a manner appropriate to their significance. **A heritage asset or its setting should be supported with a use consistent with their conservation together with the**

asset's contribution to sustainable communities, local economies, and local character and distinctiveness. Proposals should avoid harm to heritage significance wherever possible and, where harm cannot be avoided, minimise it. Any harm to or loss of a designated heritage asset's significance, including harm arising from development within its setting, must be supported by a clear and convincing justification.

Policy HE5: Assessing effects on heritage assets requires the potential impacts of the development proposals on the significance of the assets to be identified with regard to positive effects, no effect, harm and total loss of significance, and decision-makers' satisfaction that assessments accurately reflect the effects as stated below:

*"a. Have a **positive effect**, which is where the significance of a heritage asset would be enhanced, or better revealed; or*

*b. Have **no effect** on the significance of a heritage asset; or*

*c. Result in **harm** to the significance of a heritage asset, either from work affecting the asset itself or from development **within its setting**. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or*

*d. Cause the **total loss** of the significance of a heritage asset."*

This policy also requires development proposals with heritage impacts to be accompanied by an assessment of significance and potential impacts.

For the **Proposals affecting designated heritage assets, Policy HE6** states:

*"1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, **substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)**. This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance."*

*2. Development proposals which would have a **positive effect** on a designated heritage asset **should be supported**.*

*3. **Any harm** to a designated heritage asset will be a matter of considerable importance and weight. which should be dealt with in accordance with paragraphs 4 to 6 of this policy.*

*4. Where a development proposal would **harm** the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal.*

*5. Where a development proposal would cause **substantial harm** to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss."*

For the **Decisions on non-designated heritage assets, Policy HE7** requires:

"1. Development proposals which would have a positive effect on a non-designated heritage asset should be supported.

*2. Where a development proposal would **harm** the significance of a non-designated heritage asset, **this should be weighed against the benefits of the proposal and a balanced***

judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset.

3. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.”

National Planning Practice Guidance (NPPG) 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”.

Policy EN4 ‘Locally important heritage assets’ states the following:

*“Development proposals that affect locally important heritage assets will demonstrate that **development conserves architectural, archaeological or historical significance** which may include the appearance, character and setting of the asset.*

*Planning permission may be granted in cases where a proposal could result in harm to or loss of a locally important heritage asset only where it can be demonstrated that **the benefits of the development significantly outweigh the asset’s significance.** Where it is accepted by the Local Planning Authority that retention is not important, **recording of the heritage asset should be undertaken** and submitted alongside development proposals. **Replacement buildings should draw upon heritage elements of the previous design, incorporating historical qualities that made the previous building significant.** This may include appearance, scale and architectural quality.”*

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.”

Other Guidance

English Heritage’s “Conservation Principles” provides policy and guidance for the “sustainable management of the historic environment”.

Relevant heritage assets

The application site, which is located to the south of Friar Street, a historic route dating back to the 12th century, includes locally listed LL23 – The Bugle at 144 Friar Street on the corner with Fife Court, one of the last examples of small courts in Reading. Within the immediate area of the site lie Grade II listed buildings at 147 Friar Street, 2-32, Queen Victoria Street, 24-28, Broad Street, 148, 149 and 150, Friar Street, 35-38, Broad Street, 1-31, Queen Victoria Street, and locally listed LL14 - King Edward Buildings, 1 Station Road/22 Friar Street, as illustrated.



Application site in red boundaries, locally listed buildings with pink stars on them and statutory listed buildings with purple stars

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, 2026)

Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

The listing description of the Bugle and other listed buildings is read as below

LL23 – The Bugle, 144 Friar Street including linked buildings to the rear

“The Bugle at 144 Friar Street is a former public house dating from the mid-19th century. Until its 2021 closure, it had been in use for the sale of beer since at least 1841 and represents the last traditional public house in the western part of Friar Street. It sits within Fife Court, which is one of the last examples of small courts in central Reading, with many other examples having already been lost.

The building was initially classed as a beerhouse, operated by Daniel David according to the 1841 Census, of which there were a number in Reading, under the simplified licensing system of the 1830 Beer Act. Despite changes to the licensing regime in 1869 that resulted in the closure of many of Reading's beerhouses, the Bugle retained its license. It received a wine licence in 1952 and a full publican's licence in 1955.

The name of The Bugle dates from at least 1866, and the current pub sign is from the 66th (Berkshire) Regiment at the Battle of Maiwand (1880), which is also commemorated by the Maiwand Lion monument in Forbury Gardens. There is likely to have been an association between the pub and regiment, with the owner in 1850 being William Winkworth, a Captain and adjutant in the Berkshire Royal Militia, which took part in the Crimean War and was amalgamated into the regiment in 1881. The name prior to 1866 may have been The Sir John Barleycorn.

The building was in the Winkworth family ownership until being auctioned in 1882 along with the Fife Court cottages. In 1903, the freehold owner was the brewery H & G Simonds, which operated from Bridge Street until 1978, and which was an important part of Reading's 19th Century industries.

Whilst there have been changes made to the building over the years, the overall size, scale, massing and contribution to the Friar Street environment remain, as well as the flat clay tiles, single central timber framed window facing Friar Steet, and angled corner. Alterations include a rearrangement of the bars in 1920 and changes to the smoke room in 1925."

147, FRIAR STREET ([147, FRIAR STREET, Non Civil Parish - 1113488 | Historic England](#))

"Details

1.

5128

SU 7173

12/492

FRIAR STREET

(South Side)

No 147

II

2.

Circa 1880s. 3½ storey commercial frontage. Painted brick with stone voussoirs and dressings. Cornice and parapet. 3 high segmental headed dormers with ramped moulded coping between and modillion cornices, centre 2-light. These and 3 pairs of windows on 2nd floor are plate glass sashes. 4 depressed arches on 1st floor under cornice and fascia with outer pilasters and dividing fluted columns with Corinthian caps. Cornice and fascia over ground floor shop front of similar pattern with recessed entrance. The 2 storey shop front is the main interest of this building and it is included for that reason.

Listing NGR: SU7149673571"

2-32, QUEEN VICTORIA STREET, 24-28, BROAD STREET, 148,149 AND 150, FRIAR STREET, 35-38, BROAD STREET, 1-31, QUEEN VICTORIA STREET ([2-32, QUEEN VICTORIA STREET, 24-28, BROAD STREET, 148,149 AND 150, FRIAR STREET, 35-38, BROAD STREET, 1-31, QUEEN VICTORIA STREET, Non Civil Parish - 1113564 | Historic England](#))

" ...

A circa 1894 commercial street with returns to Broad and Friar Streets. Probably by Joseph Morris. Dutch gabled free Baroque style. 3 ½ storeys, yellow brick and terracotta with dividing Ionic pilasters. Dentil cornice. Pilasters to dormers, broken pediments above. An elongated

pattern of shallow bays to 1st and 2nd floors 4:2:1:1:1:3. Mullion and transom window to bays, sashes with architraves (and pediments on 1st floor) to rest. Modern shopfronts, retaining cornice to fascia and scroll brackets to pilasters, only one shop retains prewar shopfront. Large returns to Broad Street. The return to east (No 28 Broad Street) supported by No 26 (dated 1894, grey brick with red terracotta dressings) and by No 24 (an early C20 Bank with -large shaped pediment doorway on corner to Cross Street; red brick with stone dressings and stone fret patterns to gables).

Listing NGR: SU7152373529”

LL14 – King Edward Buildings, 1 Station Road/22 Friar Street

“Originally built as a Government building (the Inland Revenue). A handsome Edwardian building of 1902. The building is of 3½ storeys, with dormer windows at attic level. Built in red brick with Ashlar stone detailing forming the quoins of a canted bay at the junction of Station Road and Friar Street, and forming the gauged arch over the door into the canted bay. The door has a niche with stone surround above it above and a decorative stone relief. The main canted bay, corner elevation at the junction of Station Road and Friar Street is relatively unaltered and the historic form at first and second forms is clearly identifiable. Three bays on Friar Street and an impressive 11 bays on Station Road with a former main entrance with stone surround at ground floor level (now lost) emphasised by a segmental pediment at roof level with a decorative stone relief. Five impressive brick chimneys survive. Parapet with hipped slate roof behind with dormer windows with pitched roofs. Windows: 9 over 9 sashes survive at first and second floor levels with gauged brick arched heads with keystones. Interior and ground floor shopfronts largely altered.

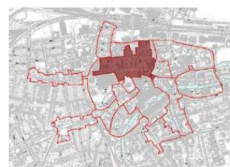
Architects were E B Hoare and M Wheeler of Portman Square, London and Reading. The building is considered to be an early example of the Neo-Classical Style in Reading.”

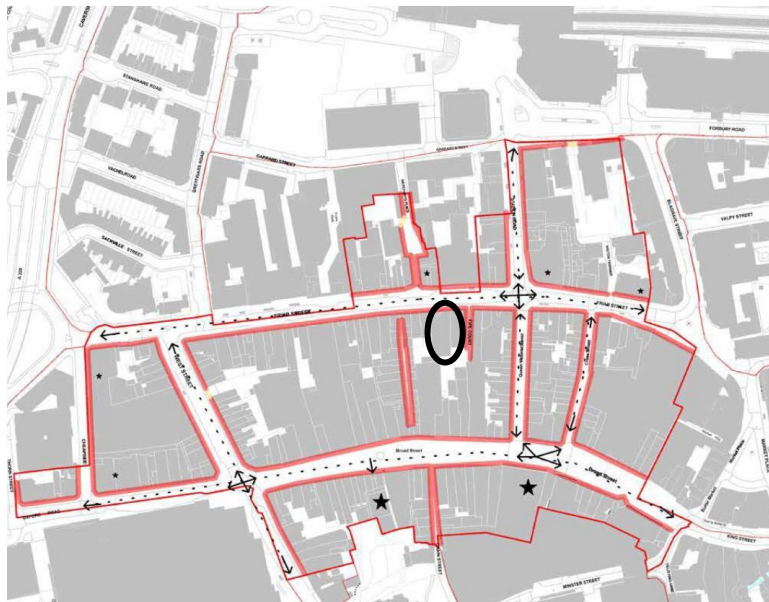
The application site, due to its location in the town centre and the existing buildings it includes, including the locally listed Bugle, forms an important part of the historic environment, with historic and attractive buildings along this Section of Friar Street. The analysis of ‘Relative Contributions to Character’ and ‘Visual Containment, Focus Points and Important Views within Character Area’ as given below from Reading Historic Area Assessment Study by the Council dated 2023 shows the contribution of the existing character of the application site to the strong continuous historic and aesthetic value of the area.



3.2 Relative Contributions to Character

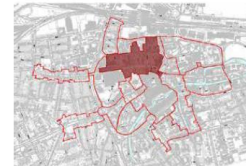
■ Detracting Contributor
■ Positive Contributor
■ Neutral Contributor





3.2 Visual Containment, Focus Points and Important Views within Character Area

- Strong Visual Containment
- Neutral Visual Containment
- Weak Visual Containment
- ★ Major Focal Buildings/Structure
- ★ Secondary Focal Building/Structure
- Kinetic view
- ↔ Key Viewing Points
- Static View



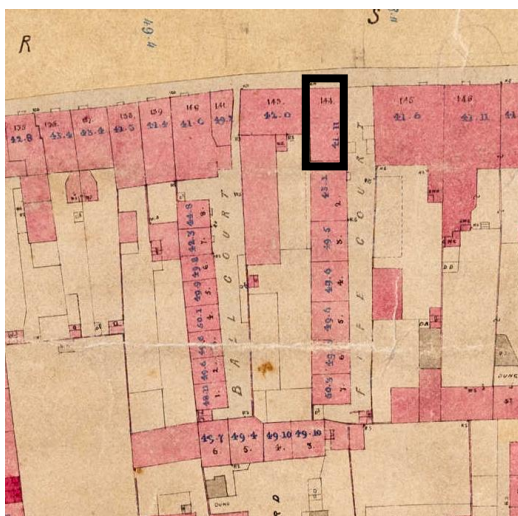
Impact of proposal upon heritage asset(s)

Further to the pre-app discussions, following my thoughts on the proposed scheme at pre-app, although I noted that the proposed new build would have lower heritage impacts stemming from the height, scale and appearance of the building, I find the design of the proposed 'Fife Court' elevation requires more attempts to reflect the demolished part of the non-designated heritage asset.

Here I insert my comments, as they are mostly the same as before, in [blue](#) and further comments on the Fife Court elevation and impacts on the Bugle, a non-designated heritage asset in the application site.

[I noted that this application has a similar scheme to the approved permission PL/22/1235; however, it proposes further demolition of the historic extension / Fife Court cottages of locally listed the Bugle. In contrast to this, the new development would have a lower height, smaller scale and plainer façade.](#)

[The historic map regression shows that although the rear/side extensions have been altered through time, compared with the most original fabric of the Bugle, they have lower significance, but the historic footprint has been preserved, and therefore requires a different approach that would represent the history of the site.](#)

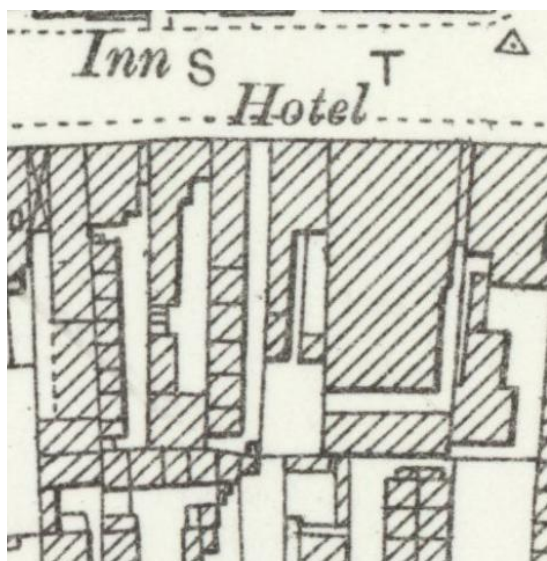


Reading Board of Health Map - 1853

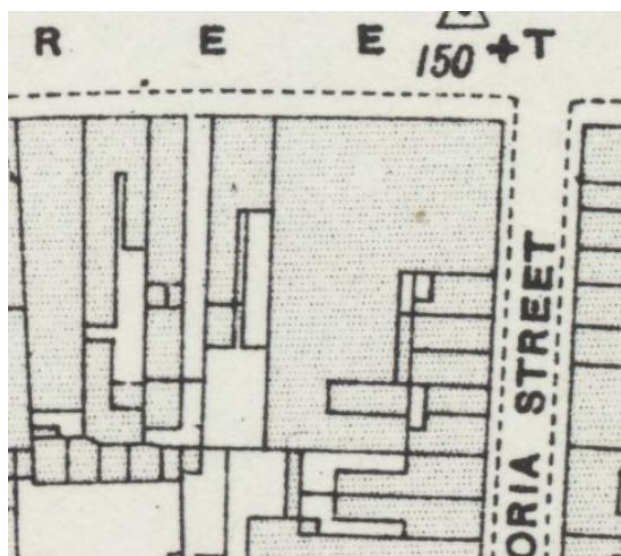


Ordnance Survey Map dated 1875 to 1877 (1879)

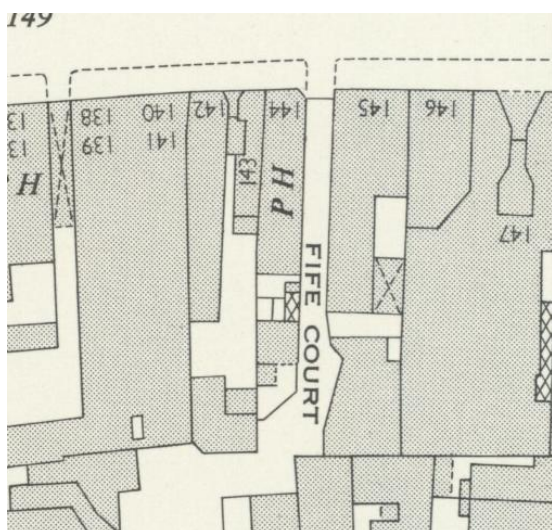
The proposed footprint and historic fabric to be retained by the proposed development is shown with black boundaries.



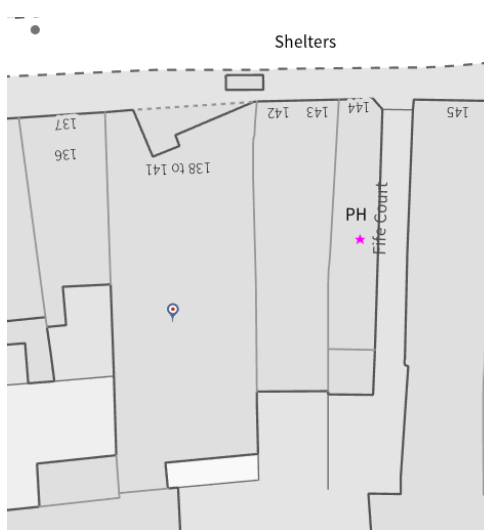
OS Map dated 1898 (1900)



OS Map dated 1931 to 1932 (1934)



OS Map dated 1957



OS Map dated 2026

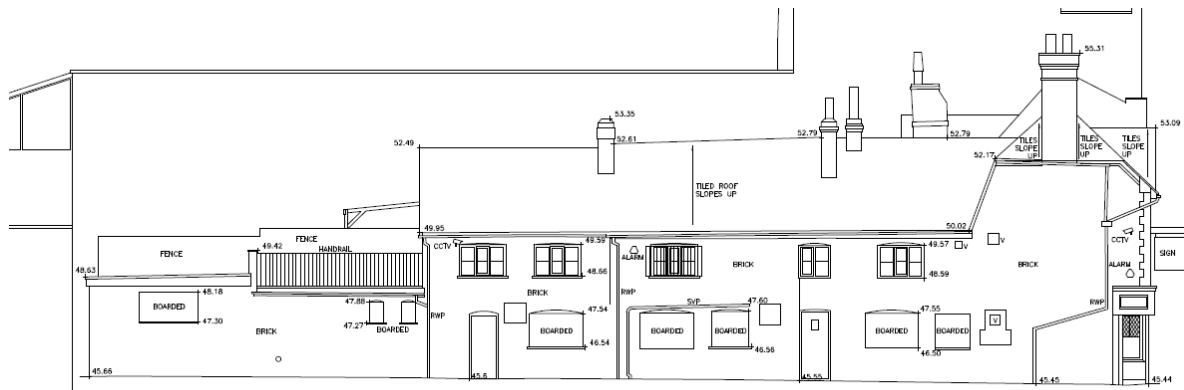
The proposed demolition of the historic extensions/buildings facing Fife Court would result in the loss of original and historic features, resulting in harm to the Bugle. However, because the proposed new build would have a considerable reduction in height and scale, and its Friar Street façade would not be as imposing as the previously approved scheme upon the Bugle. Because of the entrance and the openings in the façade, along with its composition of two-colour bricks and other materials, it would sit more comfortably within the historic environment.

The approved scheme has an arched main entrance that makes the building appear monumental and compete with the heritage assets. Therefore, the harm generated by the proposed development would be within acceptable limits with regard to the external features of the proposed building. However, due to the loss of some historic elements, the façade facing Fife Court requires a more sensitive approach. Due to the significance of non-designated heritage, which also derives from its relationship with 'cottages' and forming a 'small court', there is a need to reveal or include some traces of this. I think the old and new fabric should be integrated via a smoother transition on the eastern façade, creating a transition. This can be done via copying the ratios/dimensions of the existing original openings, the use of some artwork or displaying a name in a successful way to reveal the historic relationship.

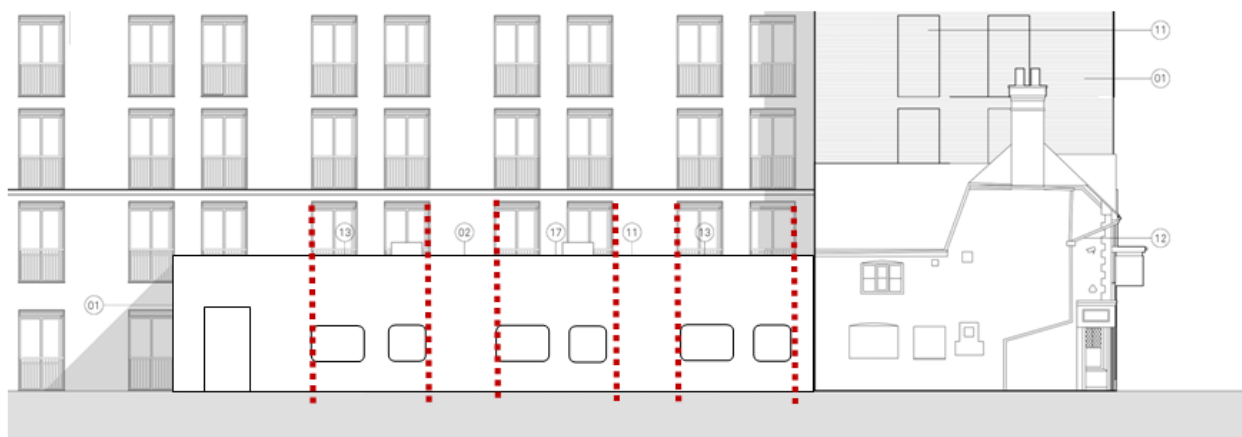
The NPPF (Dec 2024) requires the impact assessment to be proportionate to the significance of the heritage asset, which is not a preserved statutory asset. As such, with some contemporary approach appreciating the value of Fife Court and making the story of this façade legible could make the proposal acceptable.

The design and appearance of the new building could be argued to be plain, requiring a more attractive entrance or features. However, due to the location of the site, in order not to compete with the historic buildings or dominate the historic environment on Friar Street, the proposal should not stand out. There is also a need to emphasise that the Bugle would be refurbished with some conservation works, which the proposal would bring back the use of the pub, so that the benefits of the scheme would be clearer. Therefore, revisions are expected.

Regarding the design of the proposed building and its heritage impacts, my comments are the same. However, I think there could have been more about the design of the new element proposed behind the Bugle. The proposed development would reduce the original character and legibility of Fife Court, although the demolition is for the 1920s section of the non-designated heritage asset.



refurbishment works and commercial use for the non-designated heritage asset, all of which are supported and considered beneficial. However, the design lacks some historic input.



To conclude, there would be harm to the significance of the non-designated heritage asset and therefore do not totally agree with the following statements from the submitted Heritage and Townscape Statement, as the condition of the historic building or heritage asset does not determine or decrease its significance.

“Apart from the building line and the frontage of No 144, the Bugle PH, the Site’s contribution to the setting of the surrounding assets is limited. Although Fife Court is one of the remaining historic alleys in the area, its current condition and unkempt appearance detracts from the historic setting of the area. Additionally, the rear of the buildings appear haphazard and piecemeal, not contributing to the area or the immediate townscape.”

“In design terms, the single storey brick elevation would reflect the lower part of the tenement block, with the fenestration reflective of the Bugle.”

However, I agree with *“Additionally, the retention and repair of the oldest two phases of the Bugle and its operation as a separate commercial unit would be considered a heritage benefit. This would reinstate the historic use of the building, although it may not be operating as a pub.”*

I think the harm would totally remove the ‘small court’ character of Fife Court, and as such further revisions to the design of the east elevation would be ideal. I would like to leave the final judgement to the planning officer, as I am unable to assess the total public benefit expected from the proposed scheme in accordance with Policy HE7 of the NPPF, which requires that *“3. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.”*

Conservation response

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

Contact details

Buju Can Cetin, Conservation Officer