

Memorandum: Consultee Response

TO:	Jonathan Markwell	Direct Line:	
FROM:	Jonathan Mullis	Ext No.	
Consultee:	Historic Buildings Consultant	Dated:	1-4-20
Ref:	200188		
Proposal:	Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floorspace (A3 use class), together with a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road		
Location:	Former SSE Site, Vastern Road		
Consultee Response:	DWG / Doc Ref:		

National Planning Policy Framework (NPPF)

In March 2012, the Government published the National Planning Policy Framework (NPPF), which was subsequently updated in 2019.

The NPPF sets out a presumption in favour of sustainable development and a key dimension of 'sustainability' is defined as '*...protecting and enhancing our...historic environment*' (DCLG et al, 2018).

The NPPF recognises the historic environment as comprising all aspects of the environment which have resulted from the interaction between people and places through time (DCLG et al, 2018, Annex 2: Glossary). The elements of the historic environment that are considered to hold significance are called heritage assets (DCLG et al, 2018, Annex 2: Glossary).

The associated Planning Practice Guide (PPG) identifies heritage assets as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

The glossary annexed to the PPG defines the setting of a heritage asset as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

The NPPF (paragraph 189) requires that:

189. 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. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Significance is defined by the NPPF as '*the value of a heritage asset to this and future generations because of its heritage interest*'. This significance or value may be related to a heritage asset's archaeological, architectural and artistic or historic elements and can derive not only from its physical presence but also from its setting (DCLG et al, 2012, para 56). The NPPF details the main policies regarding heritage assets in Section 12, Conserving and enhancing the historic environment (DCLG et al, 2012).

Paragraph 193 states 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 the more important the asset, the greater the weight should be). This is **irrespective** of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

Paragraph 194 states:

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. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 197 states that:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Planning Practice Guide (PPG)

PPG states that local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions but which are not formally designated heritage assets (DCLG et al, 2014, para. 39).

The PPG states under 'Why is 'significance' important in decision-taking?' that:

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Under the discussion of 'How to assess if there is substantial harm?' the PPG offers:

What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Reading Borough Planning Policies

The Reading Local Plan Adopted 2019 is the document that contains the policies for how Reading will develop up to 2036, which is the end date of the plan. It replaces the three previous development plan documents – the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015). It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided. Reading, has launched a 2050 vision for the town as a smart and sustainable city by 2050. The vision entails:

6. Maintain and enhance the historic, built and natural environment of the Borough through investment and high quality design, and capitalise on these assets to contribute to quality of life and economic success;

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;*
- *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 Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.

Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.

The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.

Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

EN4: LOCALLY IMPORTANT HERITAGE ASSETS

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.

EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT

In areas characterised by heritage assets, the historic environment will inform and shape new development. 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.*

Proposals

The proposed re-development of the former SSE site on Vastern Road, involves the demolition of a number of structures, including the locally Listed No. 55 Vastern Road, and the erection of a series of buildings to form a residential scheme from between 1 and 11 storeys with a dwellings for 209 residents, approximately 17.9sqm of leisure floorspace (café), and a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road and on towards Reading Station.

The proposals would include 43 undercroft and 12 on-street car parking spaces, including 3 disabled spaces, secure covered cycle stores with 122 cycle spaces with ancillary plant space and bin stores.

The proposed industrial-style residential blocks fronting onto Vastern Road would be up to 11 storeys high. The design for these proposed buildings are considered to be good quality, and encompass a variety of local architectural motifs from the Victorian and Edwardian housing and industrial structures in the vicinity. These features would include a mix of red with grey brickwork detailing, especially at ground floor level, arched window openings with stone coloured arches, external metal balconies and brick arched headers, set with recessed panels. Further windows would include flat stone coloured arches and stone coloured sills, a multi-coloured arched feature-window and corbelling at the upper storeys. All of these features are well designed and harmonised and based on distinctive local features and would help to reduce the bulk and mass of these multi-storey blocks.

Within the main body of the proposed scheme would be a central street with smaller linking buildings, again based around local architectural precedent. This would include a 2 storey element (Coal Drop Terrace), designed to sit alongside the existing 2 storey residential housing and 3 and 4 four storey buildings, based on the designs of the smaller scale warehouses and office structures, with slate pitched roofs. Again the bespoke designs are considered to work well within the historic context.

The design of the proposed multi-storey blocks alongside the river are of a different character to those alongside Vastern Road. These reflect the differing context of these buildings and would consist of buff brickwork, with some light stone-coloured detailing forming banding and window arches, with external metal balconies and glazed roof top extensions.

The proposals also include a feature footbridge over the Thames alongside the scheme to provide more direct access to Reading station and the town centre.

Discussion

The existing Locally Listed No. 55 Vastern Road within the proposed site is an example of an early 20th century office building built as part of the former industrial depot complex on Vastern Road. The building is clearly architecturally separately identifiable and distinct from the adjacent buildings and was built in connection with an electric works and was designed by the locally prominent architectural practice of Albury & Brown. F W Albury also designed the Grade II Listed Caversham Free Public Library. This is particularly reminiscent of 55 Vastern Road and is designed in what has been termed in the listing as an " *irregular red brick and stone sub-Voysey style with tiled roof*".

The Heritage Statement states the building at the eastern end of the present No. 55 Vastern Road was probably built as a new entrance for the Electric Works, with the eastern side of the building accommodating a carriage arch. The 1894 share issue prospectus for the Reading Electric Supply Co. Ltd shows that Albury was one of the company's directors, reinforcing this association and likelihood that his firm was responsible for the design of all of its buildings. The new stores for the Reading Electric Supply Company were built at Vastern Road in 1903, and that these were designed by the architect Frederick William Albury (1845-1912). Albury was therefore working at the site and had many connections with the company. The locally listed building at 55 Vastern Road, which is reminiscent of his style, is therefore likely to have also been designed by Albury.

As part of pre-application meeting it was recommended that options to retain the Locally Listed building were examined together with the re-directed pedestrian link-path. Façade retention was examined and a range of options for façade retention are illustrated in the Design and Access Statement (pp. 34-35 and pp. 40-43). These options were discounted due to the constraints of the site and instead the industrial heritage of the site has been used to inform the scheme design, to be branded as the "Old Power Station".

Conclusions

In conclusion, the bespoke design proposals are considered to be a good quality response to the historic context of the proposed development. Whilst the mass and scale of the buildings is extensive, the historic setting is not especially sensitive to change and the quality of the design would go some way to mitigate these impacts.

However, the proposals would result in the loss of the locally listed building at 55 Vastern Road, which is a well-designed and good quality building built by a locally renowned architectural practice.

As stated in the NPPF, local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as '*locally listed*' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions, but which are not formally designated heritage assets (DCLG et al, 2014, para. 39). As stated in paragraph 197 of the NPPF:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The proposed justification for the demolition of the locally listed building, therefore, rests on the benefit of the proposals in relation to the wider public benefits of the scheme against the heritage value of the non-designated heritage asset in the planning balance.

However, should RBC be minded to grant planning permission for this development then the following condition is recommended:

SAMPLE BRICKWORK PANELS

Before the relevant part of the work is begun, sample brickwork panels for the development hereby permitted of a minimum area of 1 square metre each shall be constructed and approved in writing by the local planning authority. These sample panels shall remain available for inspection on site for the duration of the construction of the development or until its removal is authorised by the local planning authority. New brickwork for the development shall match these panels in terms of bricks, mortar, joint profile and bond.

Summary

Please see above.