

**TOWN AND COUNTRY PLANNING ACT 1990
APPEAL UNDER SECTION 78**

**APPEAL BY BERKELEY HOMES (OXFORD & CHILTERN) LTD AGAINST THE DECISION BY
READING BOROUGH COUNCIL TO REFUSE PLANNING PERMISSION**

For

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

At

55 Vastern Road, Reading, RG1 8BU
Inspectorate reference: APP/E0345/W/21/3276463
Reading Borough Council reference: 200188

**CONSERVATION & URBAN DESIGN OFFICER'S
HERITAGE STATEMENT OF CASE
ON BEHALF OF READING BOROUGH COUNCIL**

August 2021

Planning, Development and Regulatory Services
Reading Borough Council
Civic Centre, Bridge Street

CONTENTS

1. INTRODUCTION	3
2. POLICY	7
3. THE COUNCIL'S CASE	12
i) Significance of the Heritage Asset	14
ii) Retention and re-use	24
4. CONCLUSION	37

Appendices

Appendix 1 Heritage based pre-application feedback from pre-app.

Appendix 2 Historic Environment Good Practice Advice in Planning Note 2:
Managing Significance in Decision-Taking (Historic England, 2015)

Appendix 3 Conservation Principles, Policies and Guidance (HE, 2008)

Appendix 4 Timeline of the procedure of locally listing Building LL8

Appendix 5 Photos of Building LL8 and local listing description

Appendix 6 Local listing Selection Criteria for Assessment sheet Building LL8

Appendix 7 Photo of a commercial building in Friar Street, Reading in a
similar architectural style

Appendix 8 Photos of other FW Albury buildings in Reading (two in Oxford)

Appendix 9 Screenshot of the heritage page of the Berkeley website

Appendix 10 Great Expectations pub, London Street, Reading: façade

1. INTRODUCTION

1.1 This Heritage Statement has been prepared by Bruce Edgar, RBC Conservation and Urban Design Officer (CUDO) on behalf of Reading Borough Council. A brief synopsis of my conservation professional experience is set out below. I was not involved with the proposal at application stage and my sole involvement has been at appeal stage. At the pre-application and application stages, specialist conservation advice for the Reading Borough Council Planning Service was provided by Jonathan Mullis (MSA, BA, IHBC, MCIfA, Heritage Consultant for Jacobs).

Qualifications and experience of Conservation Witness, Bruce Edgar

1.2 Bruce Edgar, FRSA, Reading Borough Council, Conservation & Urban Design Officer (CUDO)

- Full member IHBC;
- M. Philosophy (Architectural History) Uni. of Wales;
- B. Architecture (Hons), Uni of NSW;
- Corporate Member Planning Institute Australia (Urban Design Chapter);
- Member of ICOMOS (International Council on Monuments and Sites - UK), World Heritage Committee (since 2009).

Experience in the UK includes:

- Former Senior Urban Designer, (Prince's Foundation for the Built Environment, 2006 -2009), and Policy Advisor (English Partnerships) working on Collaborative Design Workshops / Enquiry by Design, for Masterplans and Regeneration schemes for historic environments with Local Councils and developers;

- 2015 - 2021, worked as Conservation and Urban Design Officer at the following Councils: LB Redbridge, LB Tower Hamlets, LB Wandsworth, LB Richmond, LB Enfield and Reading BC;
- Master of Philosophy (Classical British Architectural History 1650 - 1850), Prince of Wales's Institute of Architecture 1997-2003.

Conservation experience in Australia includes:

- 13 Years as a Specialist Planner Architect, Heritage Branch, NSW Department of Planning;

Including assessing and advising on conservation areas and assessing planning applications of statutory listed buildings; writing guidelines and advice on heritage planning and practice;

- 6 years as a conservation architect in private practice, preparing heritage statements, including 3 years as an expert heritage advisor.
- A member of ICOMOS Australia since 1990, including contributing to different versions and evolution of the Australian Burra Charter, which has been adopted for guidance in Scotland.

1.3 This Statement has been prepared in consultation with Richard Eatough, RBC Acting Planning Team Leader, who undertook the assessment and subsequent nomination of the Local listing of the heritage building in 2017 with the specialist input of the Council's then Heritage Consultant, Jonathan Mullis.

1.4 This Statement is in response to an appeal against the refusal by Reading Borough Council to grant planning permission for Application 200188, which proposed:

“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.”

1.5 This Heritage Statement has been specifically produced in response to Reason for Refusal No. 5 (please primarily refer to the separate Planning Officer Statement of Case in respect of the other reasons for refusal).

1.6 The application was considered and resolved to be refused by Reading Borough Council’s Planning Applications Committee on 31st March 2021, with the decision notice issued on 9th April 2021.

1.7 Reason for Refusal 5 states:

“The proposal would result in the complete loss of 55 Vastern Road, a Non-Designated Heritage Asset and building of local significance. The proposal has failed to demonstrate adequately that retention and reuse of the building has been explored fully. In this regard, the benefits of the proposal are not considered to significantly outweigh the harm caused to the asset’s identified significance. Therefore, the development is contrary to Policies EN1 and EN4 of the Reading Borough Local Plan (2019) and Section 16 of the National Planning Policy Framework (2019).”

1.8 This statement solely relates to:

- Discussion concerning the existing non-designated heritage asset (NDHA) building at 55 Vastern Road and its significance;
- Whether options for inclusion and reuse have been explored fully; and
- Responding to relevant elements of the Appellant’s Statement of Case.

1.9 Discussion concerning the benefits of the proposals, in the context of whether these outweigh the harm caused to the asset’s identified significance (as also referenced in reason for refusal 5), are largely beyond the scope of the CUDO/this Statement and this aspect is discussed in the Planning Officer’s Statement of Case.

1.10 The evidence which has been prepared and provided in this Heritage Statement of Case (SoC) is true and has been prepared in accordance with the guidance of the professional institution the Institute of Historic Building Conservation (IHBC). The opinions expressed are the true and professional opinions of Bruce Edgar.

1.11 This Statement should be read in conjunction with a number of previous heritage-based documents by Reading Borough Council:

- Heritage based pre-application feedback from pre-application meetings 1, 2, 3, 5 and 6 (relevant extracts are included as Appendix 1);
- The application stage RBC Heritage memorandum consultee response report prepared by Jonathan Mullis, the then Heritage Buildings Consultant for RBC (see document 4b submitted with the Council's appeal questionnaire)); and:
- The committee report and update report to the Planning Applications Committee (included as part of the Council's questionnaire documents), including sections 4B) and paragraphs 6.26-6.42 (locally listed building) of the committee report.

1.12 I concur with the decision to recommend Refusal of the application as given in Reason for refusal 5 (as detailed in the Introduction section above).

2. POLICY

National and local policy relevant to the consideration of heritage aspects of the appeal proposal

- 2.1 The proposed scheme would involve the total loss through demolition, of the locally listed building (referenced LL8 on the Council’s website) at 55 Vastern Road. It is therefore necessary to consider the development proposal against relevant national and local policy. This primarily consists of Section 16 of the National Planning Policy Framework (NPPF) (revised 2021), entitled, ‘Conserving and enhancing the historic Environment’ and adopted local planning policies Policy EN1: ‘Protection and Enhancement of the Historic Environment’ and Policy EN4: ‘Locally Important Heritage Assets’ (Reading Borough Local Plan, November 2019).

National Policy

- 2.2 The following paragraphs from the recently-revised NPPF are relevant and for completeness, these are reproduced in full below:

“189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

“190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*

*c) the desirability of new development making a positive contribution to local character and distinctiveness; and
d) opportunities to draw on the contribution made by the historic environment to the character of a place.”*

“195. 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.”

“197. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.”

“203. 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.”

Local Policy

- 2.3 Adopted local plan Policy EN1 ‘Protection and Enhancement of the Historic Environment’ of the Local Plan seeks to ensure that assets on the Local List are protected and where possible, enhanced. As a starting point, the policy requires proposals to avoid harming the Asset. The policy recognises that should any loss of a Heritage Asset occur, this must be accompanied by clear and convincing justification, usually in the form of public benefits. Applications which affect, or have the potential to

affect, the significant features of Heritage Assets should be justified by a Heritage Statement.

- 2.4 Adopted local plan Policy EN4: ‘Locally Important Heritage Assets’ is relevant, as it specifically considers matters which affect locally important heritage assets. Policy EN4 seeks to ensure that development which specifically affects locally important heritage assets conserves the architectural, archaeological or historical significance of the asset:

“Planning permission may be granted in cases where a proposal could result in the loss of a locally important heritage asset”, subject to certain criteria being met. As this proposal results in the total loss of a locally listed Heritage Asset, the following tests contained within this policy must be met. These are relevant to the consideration of this planning application:

“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”.

- 2.5 The Council has determined that this requirement has not been met.
- 2.6 Whether there are benefits of the development which clearly outweigh the asset’s significance is a matter for the planning balance. My statement addresses the other elements of policies EN1 and EN4 including the degree of harm which the development would cause to the significance of the asset.

Other relevant conservation policy documents

- 2.7 Other guidance documents relevant to assessing relevance/significance in relation to heritage assets and locally listed buildings are as follows.

- a. Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking (Historic England, 2015) (Appendix 2) ('GPA Note 2')
- b. Conservation Principles, Policies and Guidance (Historic England, 2008) (Appendix 3)
- c. Local Heritage Listing: Identifying and Conserving Local Heritage Historic England Advice Note 7 (Second Edition) January 2021- (included as part of the Council's appeal questionnaire).

2.8 GPA Note 2 sets out clear guidance for assessing significance of heritage assets including - as is relevant in this case - non-designated heritage assets, at paragraphs 3 (in the 'Introduction' section), paragraphs 4 and 5 (the 'General advice on decision-taking' section) and paragraph 25 (in the 'Assessing the proposals' section):

"3 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance."

"4 Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest. A variety of terms are used in designation criteria (for example, outstanding universal value for World Heritage Sites, national importance for scheduled monuments and special interest for listed buildings and conservation areas), but all of these refer to a heritage asset's significance."

"5 Heritage assets include designated heritage assets and non-designated assets identified by the local planning authority as having

a significance justifying consideration in a planning decision (NPPF glossary, page 52). The National Heritage List for England is the official database of all nationally designated heritage assets - see www.HistoricEngland.org.uk/listing/the-list. Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application. Archaeological potential should not be overlooked simply because it is not readily apparent.”

“25 In deciding applications for planning permission and listed building consent, local planning authorities will need to assess the particular significance of the heritage asset(s) which may be affected by the proposal and the impact of the proposal on that significance reflecting the approach as described in paragraphs 3-5 above. In most cases, to assess significance LPAs will need to take expert advice, whether in-house, from shared services or from consultants. It is good practice to use professionally accredited experts and to comply with relevant standards and guidance (For example, the ClfA Standard and Guidance: Archaeological Advice). To find a list of expert groups, see paragraph 19.”

3. THE COUNCIL'S CASE

Introduction

3.1 The locally listed building, referenced LL8, was added to the Council's list of Locally Listed Buildings on 22 May 2017. A timeline of this procedure is set out at Appendix 4 and the listing description is in Appendix 5. The Council's procedure for local listing was set up in 2013 in accordance with guidance available at that time and remains consistent with Historic England's advice as set out in paragraph 2.7 c above).

3.2 The Locally Listed Building in question currently looks like this:

[55 Vastern Road, Reading, southern façade facing the street.](#)



3.3 Further photos of the building are at Appendix 5. A brief description of the locally listed building is given below. The significance of the building was summarised in the application stage memorandum consultee response by the then RBC Heritage Consultant and was based on the Local Listing

Criteria for Assessment which led to the inclusion of the building on the Council's local list (see Appendix 6):

“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.”

3.4 The memorandum from the Council's Heritage Consultant further states in relation to the effect of a proposal on significance:

“ The effect on an undesignated heritage asset should be considered in accordance with paragraph 197 of the NPPF. Substantial harm is a high bar but in this case, the demolition of the non-designate heritage asset, the proposals would result in ‘substantial harm’ to the undesignated heritage asset, within the terms of the NPPF. Paragraph 197 of the NPPF which 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.”

3.5 In relation to Refusal Reason 5, it is considered that the proposal for the demolition of the existing Locally Listed building, a Non-Designated Heritage Asset, was considered to cause unacceptable harm to the character and significance of the site. After consideration of the available information and the officer report, the Council's Planning Applications Committee agreed that the proposed scheme would cause substantial harm to the character and significance of Non-Designated Heritage Asset and resolved to refuse the application.

3.6 This statement will now expand on this memorandum and the Selection Criteria, acknowledging the guidance for assessing significance and impact on significance as set out in the NPPF and the other guidance documents identified above.

i) Significance of the Heritage Asset

3.7 The reason for refusal states that the building is of local significance. It is necessary to determine the significance of the heritage asset and to consider what is meant by the term "conservation". At this point it is helpful to highlight how these terms are defined in Annex 2 of the NPPF, in the Glossary:

"Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."

"Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance."

- 3.8 GPA Note 2 says that the significance of a heritage asset is the SUM OF its archaeological, architectural, historic AND artistic interest. In this case it is ‘the sum’ of the building’s architectural, historic and artistic (stylistic) interest which is both individually and also cumulatively, significant.
- 3.9 Conservation Principles, Policy and Guidance (2008) (Appendix 3) is an overall summary of best practice principles and guidance. It identifies the criteria used in preserving and retaining of items (buildings etc.,) in conservation and heritage matters. The building analysis includes looking at its heritage values, which are aesthetic, communal, historic or evidential, which are included in the application for listing of Local buildings.
- 3.10 The guidance at paragraph 5.4 states,
- “If conflict cannot be avoided, the weight given to heritage values in making the decision should be proportionate to the significance of the place and the impact of the proposed change on that significance.”*
- 3.11 Historic England’s Good Practice Advice note 2 (Appendix 2) (GPA Note 2) advises that consideration needs to be given to the nature of the significance; the extent of significance; and the level of significance and the impact of the proposal on the particular significance which has been identified. Historic England’s Heritage Listing Advice Note 7 (included as part of the Council’s appeal questionnaire) within the Summary section states, “These [local heritage lists] enable the significance of any building or site on the list to be better taken into account in planning applications affecting the building or site or its setting”. Therefore, the

process of local listing confirms via the headline characteristics of the subject building/structure, the significance of the Asset.

- 3.12 The Local listing description of the building is considered to be clear and comprehensive in describing the various aspects of the importance of the building - social/architectural; historic/townscape - and indeed, is considered to be more comprehensive than many descriptions for Statutory Listed Buildings (Designated Heritage Assets), which can be quite vague (especially if these have not been updated since the 1950s or 60s).
- 3.13 For the discussion below, please also refer to Appendix 6 for the Criteria for Assessment of the building.

Age of the building

- 3.14 Selection for the local list needs to have first found that the building was between a certain age range and condition. In this case, that is 1840-1913: *“1840 - 1913: Any building, structure or group of buildings that is/are substantially complete and unaltered and of definite significance.”* It fulfils this criteria. This building has not been considered for Statutory listing, so it is not known if it would be worthy of formal listing. However, the fact that it is not Statutorily Listed is not a reflection of its significance. I am aware that a lot of good quality Victorian and Edwardian buildings in the borough have been lost over the last twenty years or so and this is part of the reason why the local listing process was introduced in Reading Borough in the first place.
- 3.15 This building has an importance for a number of reasons. These are considered to be both individually important, as well as being

intrinsically connected (for instance, in this case, the local/social importance of the architect links to the status of the architect himself).

Historic interest: social importance and industrial importance

- 3.16 Research conducted on behalf of the Council by the Reading Local Studies Library in 2017 indicated that the site has strong associations with local electricity production and is a rare remaining example of the industrialisation of Reading in the early 20th Century, particularly in the area north of the main railway line. The LL8 building was of particular importance symbolically, being the entrance to the Electricity Power Station.
- 3.17 The building was designed by a well-known firm of local architects and its director Frederick William Albury (1845-1912). Albury was quite an important person in the town around the turn of the 20th. Century. He was a student of Alfred Waterhouse, he was a local historian himself (who wrote about Reading Abbey), he was the owner of an accomplished architectural firm and part founder of the electric company itself, which fuelled the industrial significance of Reading. His association adds to the Social significance of the asset.
- 3.18 In terms of industrial importance, the building was the main gateway building to the electric supply company and was built the same year as the electric tramways were opened, fuelling Reading's industrial expansion (the town being famous at the time for 'beer, bulbs and biscuits').
- 3.19 An inspection of the site in 2017 shows that the external envelope, which is part of the Office/Caretaker flat's significance is largely intact. It is this

character which is part of the building's significance in Industrial terms, as the purpose of the building as a caretaker's lodge, office and gatehouse is clearly identifiable. The interior retains some 'nibs' of internal walls, corncicing, etc. The building is solidly built, but on the face of it, able to be receptive to change and adaptation, as will be discussed further in Section ii) below. There would be substantial harm to the total loss of the building in Industrial terms.

Architectural interest: sense of place, innovation and virtuosity

- 3.20 According to the Council's former Heritage Consultant, the style is an eclectic mix of a number of architectural styles, making use of polychromatic effects, including Neo-Gothic elements, appearing to be a Victorian building in a kind of Classical/Georgian revival style, which was fashionable at the time. There is use of stone in the string work, porticos, headers and pillars which gives this small building a grandeur beyond its size. I consider the building to have a more Classical, Italianate influence, which is reflected in Albury's other works.
- 3.21 Albury was working at a time when several other architects were also producing fine commercial buildings in Reading. As an example of another commercial building of the same period in Reading, using similar detailing and materials, please refer to Appendix 7 which shows a commercial building in Friar Street, Reading. There is clearly an artistic/stylistic similarity here and this helps give Reading its sense of place. Substantial harm through the total loss of the building would be caused to the architectural significance of the building.

Architectural interest: work of a notable local/national architect/
engineer/builder

3.22 An early understanding of the importance of the building was the realisation that this building was the work of Albury. FW Albury/ Brown & Albury (Architects) were responsible for a number of important civic/community buildings in Reading, including the following (and there may be others still not yet attributed to him or his firm):

Public houses:

- The Rising Sun, Forbury Road (Locally Listed: LL7);
- The Corn Stores, Forbury Road (Grade II);
- The Cross Keys Inn, Gun Street (identified as a building of townscape merit in the St Mary's Butts / Castle Street Conservation Area Appraisal 2008);

Libraries:

- West Branch Library (now Battle Library, Grade II); and
- also attributed to him, Caversham Free Library, Church Street, Caversham (Grade II);

Department Stores:

- the original Heelas Department Store, Broad Street (now John Lewis, the façade of which partially survives at first, second and third floors);
- Jacksons department store, Kings Road/High Street (Jacksons Corner identified as a building of townscape merit in the Market Place/London Street Conservation Area Appraisal);

Other important buildings in Reading:

- The London and County Bank (latterly the National Westminster Bank), Market Place (Grade II);
- St. Saviour's Church, Berkeley Avenue/Wolseley Street;
- 4-storey extension to Great Western House/Hotel, Station Road (now the Malmaison hotel, Grade II).

3.23 Photographs and brief details of these examples of a selection of Albury buildings listed above are provided as Appendix 8. Albury & Brown were also known to have designed other large buildings further afield, such as the former Wilberforce Temperance Hotel in Queen Street, Oxford, and the former YMCA Building in George Street, Oxford as also detailed in Appendix 8. This suggests that the firm may have been engaged in other projects in the wider area, certainly the local architectural historian, Sidney Gold thinks so, when questioned in a telephone call with Richard Eatough in 2017), although the full extent of this wider influence is largely unknown.

3.24 Albury was therefore a well-known local architect with influence in the wider region and with connections to Waterhouse, and may have even had influence nationally in other Waterhouse buildings. This brings Albury into the realms of possibly being a nationally-important architect and in doing so, adds to the architectural significance of the asset. The total loss of the building would therefore cause substantial harm in terms of Architectural significance, given the importance of the architect and links to the town's architecture (and beyond).

3.25 At paragraph 2.4 of the Appellant's Heritage SoC it is suggested that there is some doubt about the architect. This would appear unlikely as

Albury himself was one of the founders of the electricity supply company and the Berkeley website (Heritage page - see Appendix 9) also notes that Albury designed the electric company buildings, so there is no cogent argument presented as to why this key building would have been designed by anyone else. This aspect of the Appellant's case is respectfully considered to be unwarranted conjecture.

Appellant's views and conclusions on significance of the NDHA

3.26 It is somewhat surprising that the Appellant's own marketing material on the Berkeley Homes' website under 'Heritage' for the site (see Appendix 9), credits Albury with designing the buildings, but manages not to note the locally listed building at all, nor reference its construction date of 1903, which was clearly very significant at the time (the connection of electricity supply to the new electric trams). In the timeline on this webpage, no reference is given at all to the locally listed building until 1940, some 37 years after it was built, and even then, the reference is to the occupant, not the building itself. However, a rather small, grainy photo (entitled 'aerial view from south-west') shows the locally listed building in place with a frontage to it, providing a more grand setting to the entrance than is shown now. The webpage is indicative of the dismissive approach taken to the significance of the building by the developer and the Heritage page of the website ends by picking up on design features of general power station precedents (brick, warehouse roof forms, chimney, arched windows) but neglects to mention elements of the locally listed building itself (for instance, stone window surrounds, bay windows, polychromatic brick/stone details). This indicates to me that the Appellant has not properly appreciated the significance of the

building in coming to the view that it has “a relatively low level of significance” (see below).

3.27 The LPA does not agree with the position of the Appellant on significance. Mr. Weeks in his Heritage SoC (see Appendix 18) at paragraph 4.2 notes that, “..*the building has a relatively low level of significance, reduced through various detracting alterations over time and the loss of its historic setting, including the main power station buildings to which it was ancillary*”. Mr. Weeks then subsequently states that the Council’s conservation officer commented during a pre-application meeting that the remaining heritage value the building possesses relates mainly to its front façade. I will respond to each of these points.

3.28 With regard to setting, it is considered that the building’s setting has not in fact, altered significantly: it has always experienced abutting significant industrial/commercial buildings, as it does today.

3.29 For clarity, Jonathan Mullis was not an officer of the Council, he was the LPA’s retained conservation consultant. With regard to the comments attributed to Mr. Mullis on the façade, the meeting notes supplied in Mr. Weeks’ Annex A are not an agreed note, so they cannot be verified. However, the pre-application response letter 2 which the LPA provided on 15 February was the formal response to that meeting and makes no such concession that, “...*the remaining heritage value the building possesses relates mainly to its front façade*”.

Conclusion on significance

- 3.30 The previous owner of the site sought to resist the nomination of the locally listed building at the time in 2017 (and then subsequently appealed against it). The Applicant/Appellant has not sought to offer any such arguments that the building is not worthy of locally listing, so the significance of the Heritage Asset as a NDHA is an area of agreement in this appeal. The significance of the building is set out in the local listing and its inclusion on the Local List follows National advice and guidance for identifying significance.
- 3.31 As set out above, its significance is considered to be high in terms of the Social and Industrial importance to the town; the quality of the Architecture; and the influence of the architect linking back to his historical associations with the town and the Reading Electric Supply Company itself. The total loss of this building would, in my opinion, be a loss to the town on a number of interlinked social and historic levels. It is common ground that the scale of loss in this case is total as the asset would be demolished which therefore constitutes substantial harm. It is set out above that the significance of the asset is also very high as a result of the interconnected architectural, artistic and historic interests. Guidance indicates that when weighing planning applications which affect NDHAs, a balanced judgment is required taking into account both the scale of any harm or loss and the significance of the asset.
- 3.32 Accepting the high level of significance to be attached to retaining the building as a starting point in terms of policy principle, this Statement will now examine the options for retention and reuse of the locally listed building by the Appellant and commentary/alternatives offered by the LPA.

ii) Retention and Re-use

Introduction

3.33 The NPPF advises that planning policies and decisions should ensure that developments are, “...*sympathetic to local character and history..*” (NPPF 2021 paragraph 130 c)). Removing the entirety of the buildings from the site, including the locally listed building, is also considered to be at odds with the sentiments expressed in paras 5.40-5.47 of the Appellant’s Design SoC which is entitled, ‘Establishing a Strong Sense of Place’. As is noted above, a sense of place is in this case going to be best achieved by correctly acknowledging history and the significance of the locally listed building.

3.34 Paragraph 189 NPPF advises that heritage assets “..*should be conserved in a manner appropriate to their significance*”. Paragraph 195 advises that conflict should be minimised between conservation and any aspect of the proposal, whilst paragraph 197 asks LPAs to examine the detailed merits of the contribution the NDHA can make. Various references in policy documents refer to the need to conserve or enhance NDHAs. The Appellant’s design response to these policy requirements is their warehouse/power station design, and not conserving the NDHA. This sub-section discusses whether this strategy is an appropriate design response.

3.35 In reason for refusal 5, it is stated that the proposal has, “..*failed to demonstrate that retention and reuse has been explored fully*”. In this sub-section, I will discuss the validity of efforts which have been made to incorporate the LL8 building.

Alternative uses of the locally listed building

- 3.36 In paragraph 6.38 of the committee report, the suggestions of options for retention set out in the applicant's DAS were examined. These were considered at the time to be somewhat cursory and retention options did not appear to have been seriously considered, in the case officer's view. Certainly, from very early on in pre application discussions with the applicant's original planning consultant (see summary of pre-application responses at Appendix 1) it was clear that the developer was intending to demolish the building to make way for their intended development, and their reasoning for doing so seemed to be that retention of the LL8 building does not feature in Policy CR11g. This is a selective reading of the local plan, where all relevant planning policies need to be considered, including EN1 and EN4. The committee report alludes to the fact that it was disappointing that even some sort of façade option did not appear to have been given serious consideration. There are several direct points about retention, particularly in Mr. Weeks' SoC which I respond to below.
- 3.37 Regarding the retention or reuse of the locally listed building, Mr. Weeks notes at paragraph 3.1 that following the conclusion of the pre-application discussions, this issue of re-use of the building was 'not raised' and therefore the "*only consideration was whether the public benefits of the scheme outweighed the limited harm*". In response to this matter and as advised above, the LPA advice was consistent in advising that the building should be retained. Policy is clear that viable uses should be found for it and that the harm caused by the (total) loss would need to be outweighed by the benefits, which were and have not been proven.
- 3.38 Mr. Weeks' SoC notes at paragraph 3.4 that the Council's conservation officer within the Committee Report (Appendix 2) at 4.1.29 is quoted as

explaining that a range of options were discussed but were discounted 'due to the constraints of the site'. This is an accurate response from the Conservation Consultant, but it also highlights the constraints put on the development as a result of the restricted nature of the application/appeal site which as Mr. Doyle notes within his SoC, severely compromises the ability to retain the locally listed building.

- 3.39 Mr. Taylor's Design SoC at paragraph 6.62 lists the work which was done to ascertain whether or not the locally listed building could be retained as part of the development proposals. This included retaining the full streetscene, integrating the building within the proposals, retaining the building as a stand-alone structure and retaining the façade only, with multiple proposals/options for each. A detailed response to this is given below in the discussion on retention below.

Flooding preventing retention

- 3.40 Policy CR11g notes that proposals are to take account of flood mitigation. The issue of flooding is raised at paragraph 3.177 of the Appellant's main SoC and paragraph 6.84 of Appendix 14 but it has not been demonstrated to the LPA's satisfaction that this issue is insurmountable. The finished floor level of the locally listed building is 300mm below the level required by the FRA. The Appellant's DAS discounts this floorspace as impossible for inclusion within the proposed scheme but has not explained what other options were considered in terms of engineering works to raise the ground floor above the level required by the FRA or other uses that would not need the fixed floor level to be increased. The Council notes that the submitted existing plans

provide the fixed floor level at ground floor and first floor (ground floor is 38.34 and first floor is 41.87) so even when allowing for space between the two floors for services etc, there is ample scope for the floor to ceiling height to meet the minimum technical standards of 2.3m (as per paragraph 4.4.42i of Policy H5, which although not applicable in the Central Area or to refurbishment proposals, still offers a useful point of reference) if the ground floor level is raised. Also, in terms of future uses, Annex 3 of the NPPF sets out in terms of flood risk vulnerability classifications showing residential to be a 'more vulnerable use', but 'less vulnerable uses' could be an alternative use. Within the 'less vulnerable uses' are offices, which is the existing use of the building. If the existing use at the building were maintained at ground floor level planning permission would not be required for this element of any such proposal.

Options for retention of the building

- 3.41 There are two main potential options for 'retention' of the locally listed building. The most preferable is to largely preserve the fabric of the building itself and incorporate it. A secondary and much less preferable option - in the LPA's view - would be some kind of façade retention only.
- 3.42 It is considered that the locally listed building currently has a rather muted/ understated contribution to the streetscene of Vastern Road, given the archway is boarded up. This and the offices adjacent are vacant and the frontage courtyard that the entrance building once enjoyed (see the Heritage page of the Berkeley website at Appendix 9) has at some point in the past been removed. Moving east, the next notable heritage structure is Reading Bridge. Heading west, the terraced

townhouses on Vastern Road and the terraced streets beyond to the north have a connection to this building in terms of their similar ages and decorative brickwork. The townhouses for instance, are in grey brick with red detailing, which is a Reading characteristic.

- 3.43 This muted contribution is considered to be due to two main things: the scale of Vastern Road itself which is an urban dual carriageway; and also because the adjoining buildings are much wider. It is possible that the previous industrial buildings had a more sympathetic relationship with the heritage building but we do not know as no clear photos are available apart from that shown on the Heritage page of the Berkeley website. What is clear to me is that the streetscene presence of this building could relatively easily be enhanced (and its significance sustained) with its incorporation within a sympathetic redevelopment proposal and indeed the characteristic and stylistic features could be enhanced, celebrated and it could contribute once again to the streetscene and the sense of place of this part of Reading.
- 3.44 Consideration also needs to be given to the area involved in the retention of the existing listed building and to what extent this is a 'site constraint'. An assessment of the footprint of the locally listed building in relation to the /appeal site 200188, shows it is only a small area. It should be noted that the red line of LL8 itself is really quite constrained, less than 69 square metres on plan. This is less than 1% of the appeal site. Nonetheless, it would be easier to incorporate if the whole of site CR11g were available; a point made by Mr. Doyle.

3.45 Given the way the present (later) SSE office buildings abut and surround the historic building on two sides already, in principle there is no concern with a development being quite overbearing on the Asset; indeed, it would be merely a continuation of the relationship it presently experiences. There would therefore seem to be ample scope to integrate this building from a purely townscape point of view. As has already been discussed, I disagree with the statement in paragraph 3.174 of the Appellant's main SoC which seeks to argue that the building should not be retained from a design standpoint due, as is stated, to its relatively low level of significance (disagreed with above in this statement), reductions through detracting alterations and setting (again, not accepted, the changes are relatively minor and setting is not an issue), and the comments attributed to the Conservation Consultant are not accepted and do not reflect the relevant pre-application advice letter supplied subsequently at pre-application meeting 2.

3.46 The Council considers that outright (or near outright) retention is achievable and appropriate within a redevelopment scheme. It is considered that this building which is some 1% of the application site area in total, could be integrated into the development of this site and provide tangible benefits for the development and for urban design and historic ends.

3.47 I consider that the total loss of the asset constitutes substantial harm and in my opinion, very great weight should be attached to this harm given the significance of the asset as described above. In principle, the locally listed building should be retained.

- 3.48 The Appellant's DAS on page 34 considers façade retention options, but presents poor examples. The Cardiff example is a rather clumsily handled facade retention scheme, 'for the sake of it' and does little to show that it is anything but 'facadism'. The Lillian Knowles house, London example is not much better and I would agree with the statement in the DAS that says that it is not an honest way for retention of the facade for functional reasons. These are not representative of the appeal situation which is a comparatively small building with a very useful entranceway which should very much form part of a larger building.
- 3.49 The third example in the Appellant's DAS, the UCL student housing in London, is almost irrelevant and a particularly bad design, in my view. It almost looks as if it is a stencil with a student accommodation scheme behind it, where the stencil compromises outlook/amenity from the student study rooms. In short, these are all bad examples, as they do not seriously reflect the opportunities of what could be achieved within the redevelopment of the appeal site. By contrast, The Great Expectations public house (London Street, Reading) (see Appendix 10) is considered to be a good example of full-frontal facadism. The front of the original building has been kept to contribute to the streetscene of the London Street Conservation Area, whilst behind is a modern pub/hotel structure.
- 3.50 The LL8 building is small-scale and unlike the Great Expectations façade. Its incorporation within 'The Olde Power Station' redevelopment would be quite different. It was a small-scale but important building at the time of the old electric company complex, it retains that relationship now and I am of the view that it's inclusion in a redevelopment scheme is possible with much more contemporary building scheme around and even over it.

Any façade retention in this case would need to have a re-purposing function such as an entranceway, archway, doorway, security lodge, concierge, etc. It should also to be remembered that the current building has and probably always was experienced as part of a much larger building, it was never to be experienced on its own and therefore considered thought can and should be given in design terms to its inclusion.

3.51 Paragraph 6.85 of Mr. Taylor’s SoC states that it was considered that the building was not able to be successfully retained whilst achieving the other objectives of the site. This should probably be more properly re-phrased as, the wider objectives of the appeal scheme, which appear to have been given greater priority. It is also noted that the word ‘objectives’ is used and not ‘benefits’, which would reflect the local policy test.

3.52 The Appellant’s DAS looks at consideration of façade retention options to this site through various high-level massing options. These are shown in very small diagrams and it is not clearly demonstrated how the building could not sit within a redevelopment proposal. The options discount the building in terms of its relationship to the main route because it does not fit with entrances and unit layouts within the development, as designed. In design terms, the building is presented as jarring with the redevelopment proposal, but it would not take too much to accommodate it, and it is accepted that this is likely to be easier in façade retention terms.

3.53 The partial loss of the asset, i.e. were a suitable façade retention scheme presented, would constitute less than substantial harm, but there would still be harm to the significance of the heritage asset as described above. For instance, Industrial/Social harm would be more severe for failing to provide a suitable use for the building, whereas from a Townscape/Architectural perspective, the retention of the façade would continue to tell the story and indicate the presence of the building, although in a much-reduced form. My opinion is that a façade retention option, even if carried out sensitively, would result in a medium-high level of harm overall to the significance of the heritage asset.

3.54 The Appellant's DAS on page 35 then moves to 'abstract reference' which appears to discuss some sort of wholesale demolition and rebuilding of the original heritage asset, which is not considered to be suitable here (to either the Appellant or the LPA). Finally, the DAS comes to retention as an option and offers an example. Unfortunately, it shows a rather simple example of where a building could nicely fit into a Georgian Street, which is not applicable to this situation and I would submit that there are more complicated instances where Heritage Assets can and have been retained and successfully assimilated into redevelopment proposals and it is wrong to restrict such opportunities to situations such as the Georgian street example.

3.55 At paragraph 3.179 of the Appellant's main SoC (and Mr Taylor's at paragraphs 6.86-7), it is noted that the Appellant proposes to incorporate design features of the locally listed building within the proposed development in Block B. This appears to hark back in certain ways to the 'abstract reference' option given in page 35 of the DAS, where this kind of

echoing or reconstructing parts of the development does not appear to be supported. In any of the senses of significance of the locally listed building, its architectural associations, etc., none of these design echoes will be noticeable or be able to communicate the value of the locally listed building in terms of any of the aspects of its significance. The overall, overpowering design emphasis will be on 'The Old Power Station' with its relatively inoffensive but largely non-specific 'warehouse' design; but unfortunately, without much local relevance; because this has been ignored. The locally listed building is considered to be suitable for retention in its current position, provides local relevance and multiple connections to the past, and furthermore is considered perfectly capable of quite serious internal intervention to make sure that it can be put to a new use. Any commentary (see Appendix 1) on the suitability of the (then) applicant's proposal to incorporate design aspects of the heritage building within the redevelopment were always a poor substitute and any such advice on this aspect of the emerging scheme was always given on a 'without prejudice' basis (and always caveated that the benefits of the scheme would need to outweigh the harm caused by the loss of the NDHA).

- 3.56 At paragraph 3.178 of the Appellant's main SoC, it is suggested that the retention of the building is unviable from a design perspective and due to the physical alterations to the locally listed building. Viability in terms of flooding constraints have been discussed above. Other uses are possible and have not been adequately explored. The building is of a size that could easily be converted into habitable space, commercial office or other ancillary services.

- 3.57 From the internal inspection of the building and the Appellant's heritage statement, and despite some more modern office adaptations, there remains a reasonable level of remaining evidence of internal compartmentation of the building and acknowledging that this is of less significance than a statutorily listed building, there would be much more opportunity for change and integrating it with the rest of the redevelopment. No 'setting' to the building is required. The fact that the current SSE buildings surround the heritage buildings on two sides mean that these frontages are much more amenable to change and could be adapted howsoever they need to be, in order to integrate.
- 3.58 At paragraph 2.3 of the Appellant's Heritage SoC (Mr. Weeks), the statement acknowledges that although the building has ceased to fill the function of an entrance building and the arch is boarded up at the front (rather than being 'filled in' as Mr. Weeks suggests) it was until relatively recently in use as offices as part of the electrical supply complex. This is true and confirms that not only was the building in continued commercial office use - indeed a very similar use for the past 110 years or so - until comparatively recently, it is still considered to be in sound and usable condition. The generally good and serviceable condition of the building is acknowledged in the applicant's Heritage Statement.
- 3.59 Paragraph 197 of the NPPF advises that viable uses should be sought for heritage buildings wherever possible. The limited consideration which appears to have been given to alternative uses to the building from the Appellant stems from a failure to recognise a need (required by policy) to conserve the Heritage Asset and configure the scheme accordingly. A

sustainable solution would be to retain the building and conserve and/or enhance it, in accordance with policy guidance.

- 3.60 The building would make an ideal feature entrance to a development given its scale, characteristic style/materials, the natural surveillance afforded by the two storey curved bays, and the entranceway itself, which could provide a pleasing and grand residential entrance. There are other secondary options which could be explored involving domestic options, lobby, domestic store/post-drop boxes, bike entrance, etc.
- 3.61 Considerations as to options for façade retention (as opposed to retaining the building) in the DAS were the only semi-realistic design alternatives provided by the Appellant and even these were supplied retrospectively. Pre-application scheme options through to the application scheme layout have not shown the retention of the building. This indicates that retention has not realistically informed the design of the redevelopment and not even façade retention was properly considered when designing the scheme.
- 3.62 Paragraph 6.38 of the applicant's DAS examines a number of options to retain the locally listed building but these identify the building as a constraint to a route, or a constraint to a frontage and also rule out residential use of the locally listed building due to flood risk. The DAS does not appear to discuss options for a viable re-use, however such as whether the former carriage arch (or even perhaps just the façade of the archway) could have been adapted to form a pedestrian entrance, even.
- 3.63 Mr. Doyle's SoC at paragraph 4.12 states that. *"The lack of a comprehensive approach, stemming from the subdivision of the site,*

affects the decision not to retain the locally listed building". He then goes on to explain why this is so and that in his view as an urban designer, the issues could be addressed by an alternative comprehensive design approach. I agree that the restricted site has limited options for the building's inclusion and it has therefore been effectively 'scoped out' of the redevelopment scheme.

3.64 Based on my own experience of urban design, there appears to be a range of options that could rearrange the massing and configuration of the proposed development, but it is evident to me that the designer has not taken the locally listed building as a legitimate site constraint and its presence has not informed their design. They have not sought to make sure that the heritage asset is retained, put to a viable use, or made a contribution to sustainable communities or local character. Their approach does not comply with the three criteria in paragraph 197 of the NPPF:

"197. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness."

4. CONCLUSION

- 4.1 With reference to Historic England's local heritage listing advice note (included as part of the Council's appeal questionnaire), the question which needs to be answered is: overall, what is the scale of the harm from the loss of the Heritage Asset? This document advises that, *"...a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset"*. (page 3 para 8).
- 4.2 This Statement of Case has set out the significance of the Locally Listed building and described why its total loss would be harmful. Its historical significance - for a locally listed building and a Non-Designated Heritage Asset - is in the case of this particular building, wide-ranging; touching to a greater or lesser degree on almost all strands of RBC's local listing Criteria for Assessment. The Appellant does not dispute the methodology or rationale for its inclusion on the Local List. In terms of National guidance and policy, the significance of the Heritage Asset, although not accepted by the Appellant, is high. The Appellant maintains that Building LL8 has a 'relatively low level of significance'. However, I have demonstrated that this is simply incorrect. Applying the NPPF and GPA2 understanding of significance, the architectural interest, when combined with the historic and artistic (stylistic) interest of the building, leads to a high level of significance.
- 4.3 Notwithstanding this evident significance, the redevelopment scheme in the appeal proposal has not been driven by a serious commitment to the retention of this building or even part or parts of it. The driver was the scheme design which seeks to remove all buildings and structures within the application red line area and start again and this was clear from the

very first pre-application meeting and it is an approach which the Applicant/Appellant has maintained consistently. Any discussion, even of the (much less preferable and in my opinion, badly-presented) façade retention options in the Applicant/Appellant's DAS, has been retrospectively applied and has not informed the scheme design.

4.5 Adopted local plan policies EN1 and EN4, and Section 16 of the NPPF indicate the need for the reuse and retention of the locally listed building as part of this development, that respects the scale, significance and character of the buildings on the site.

4.6 I also return to the central question which would appear to be posed by paragraph 189 of the NPPF: as to whether in the appeal scheme, the Heritage Asset has been *conserved in a manner appropriate to its significance*. There is clearly no *conservation* at work here. The Asset is not being retained, its façade is not being retained, no remnant parts of it, even, are being retained. The appeal proposal is not seeking to 'sustain or enhance' (NPPF terms) the Asset, so this is not a conservation-led proposal (as it should be). The Appellant has sought to justify the complete loss of the Asset through, in effect, the building's perceived obsolescence; but in doing so has failed to answer why its historical significance can be devalued and has also not realistically sought inclusion/retention alternatives to sustain or enhance the Asset. The appeal scheme's physical indications towards the past are general imitations and tokenistic; whereas the evidence and value of the Asset is self-evident, but has been dismissed.

4.7 Whilst this Heritage Statement of Case does not concern itself with the planning benefits of the overall appeal scheme, nor does it discuss the case officer's overall planning balance, I consider that the significance of the

building itself is high, and any opportunities for re-use/retention have been poorly explored.

- 4.8 The current scheme, proposing the demolition of the existing building, is harmful to the significance of the Asset/site, and ‘substantial harm’ (total loss) to this Non-Designated Heritage Asset will result. The conservation of this Asset for future generations will be lost. The nature of the loss is irreversible.
- 4.9 Although I was not involved at application stage, it is my submission that the refusal decision by the Planning Applications Committee in relation to reason for refusal 5 is supported and justified based on the information available.

Bruce Edgar, FRSA

Conservation and Urban Design Officer, Reading Borough Council

M. IHBC M.Phil. (Arch. History), M.ICOMOS (UK), M.PIA (Urb. Design Chapt.), B. Arch.