

Appendix 1 - extracts of Heritage-based written pre-application advice by Reading Borough Council

Relevant extracts from Pre-application meeting 1 (meeting held on 21/11/18; written advice dated 5/12/18 - included in full at document 10.1 of the Appellant's submission)

Page 4

As you are already aware the entrance building is locally listed and your proposal is, put simply, seeking its demolition. In this regard your submission makes reference to an initial heritage statement (not submitted in full for this pre-app) which details the building as being much or somewhat compromised, that the proposals incorporate references to the existing building and that there is a need to take a 'balanced view' in the competing demands against significant public benefits.

Input has been received from the RBC Historic Buildings Consultant. Although his full comments (detailing the policy/guidance context) are outlined at Appendix 1 below, in short, at this juncture (i.e. based on the information submitted) it is evident that the proposed development would disappointingly result in the demolition of the locally listed building. Moreover, it is also considered that this would amount to substantial harm to the locally listed building. Furthermore, greater weight should be afforded to the conservation/preservation of this non-designated heritage asset in the planning balance. Accordingly, significant concerns are raised with the demolition of the locally listed building.

It is also interesting to note that, within the past week, an appeal elsewhere in the Borough ([3-5 Craven Road](#)), also seeking the demolition of a locally listed building, has been dismissed partly on this basis.

As such, should you continue to seek to demolish the locally listed building it is considered that full / comprehensive justification will be required. As part of this you should also explore options which retain the building and incorporating it within your emerging proposals (possibly as a gateway to the public route through the site to the river). It is acknowledged that this would have knock-on implications for the remainder of the site; but the full methodology which has led you to arrive at your preferred option should be re-visited and explored further, so officers can give this appropriate consideration. To be clear, officers would however far prefer you to retain the existing building (and incorporate it as an integral part of your scheme) as part of your emerging proposals.

In addition, it is also noted at this initial stage that the intended proposal, to mimic the polychromatic brickwork of one arch of the locally listed building within the façade treatment of the replacement block, is not considered to have any heritage benefit within the terms of Reading LDF Policy CS33. It is considered to be an abstract interpretation which would not be recognised by a casual observer, nor arguably by a more informed observer either.

Initial design concept / Bulk, scale and massing (and related matters as a result)

Appendix 1 - full version of the Historic Building Consultants observations in advance of the pre-application meeting:

Memorandum: Consultee Response			
TO:	Jonathan Markwell	Direct Line:	
FROM:	Jonathan Mullis	Ext No.	0118 946 7000
Consultee:	Historic Buildings Consultant	Dated:	14-11-18
Ref:	Pre-App 181724		
Proposal:	Re-development of part of the former SSE site		
Location:	Part of the former SSE Site, Vastern Road		
Consultee Response:	DWG / Doc Ref:		
Background			
Reading Borough Council guidance is provided in:			
<ul style="list-style-type: none"> • Reading Station Area Framework (RBC, 2010) • Station Hill South Planning and Urban Design Brief (RBC, 2007) 			
<p>The <i>Station Hill South Planning and Urban Design Brief</i> (RBC, 2007) states that the wider area remained predominantly open land until the late 1800's when development encroached into the western parts of the area off Greyfriars Road and the livery stables adjacent to the station. In the mid-20th century, the centre of Reading was redeveloped. Areas of the historic core of the town were demolished to provide offices and shopping precincts. The construction of the Inner Distribution Road (the A4155), which started in 1969, improved traffic circulation but divided the town in half.</p>			
<p>The <i>Reading Station Area Framework</i> (RBC, 2010) identifies listed buildings, including Grade I and II* buildings, as well as the Market Place/London Street Conservation Area, Forbury Gardens (a historic park) and the Abbey Ruins (a scheduled ancient monument) as close to the area. The opportunities for enhancing the setting of historic assets are identified as, in the main, south of the railway.</p>			
Reading Borough Planning Policies			
The Core Strategy 2008 (with further alterations January 2015), Policy CS33: Protection and Enhancement of the			

Historic Environment states:

Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.

Within paragraph 11.8 of the Core Strategy it also specifies that:

The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".

RC5: DESIGN IN THE CENTRE

Applications for development within the Reading central area should demonstrate the following attributes:

- *Development will build on and respect the existing grid layout structure of the central area, providing continuity and enclosure through appropriate relationships between buildings and spaces, and frontages that engage with the street at lower levels, and contributing towards enhanced ease of movement through and around the central area;*
- *Development will provide appropriate, well designed public spaces and other public realm, including squares, open spaces, streetscape, utilising high quality and well-maintained hard and soft landscape, public art, that provide suitable functions and interest, sense of place and safe and convenient linkages to adjoining areas;*
- *The architectural details and materials used in the central area should be high quality and respect the form and quality of the detailing and materials in areas local to the development site;*
- *Development and any associated public realm should contribute to the diversity of the central area, be capable of easy adaptation over time to meet changing circumstances, and be designed to enhance community safety.*

Reading Borough Council Planning Policy

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Policy CS7: Design and the Public Realm relates to the general design of development within the borough and requires that:

All development must be of high design quality that maintains and enhances the character and appearance of the area of Reading in which it is located. This can be achieved through the layout, landscape, density and mix, scale and architectural detailing and materials. The policy notes that development will also be assessed to ensure that they respond positively to their local context and create or reinforce local character and distinctiveness, including protecting and enhancing the historic environment of the Borough.

National Planning Policy Framework (NPPF) 2018

In March 2012, the Government published the National Planning Policy Framework (NPPF), which replaced the

National Planning Policy Statements (PPS) and Planning Policy Guidance (PPG). The NPPF was subsequently updated in 2018. 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 NPPF 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 NPPF 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:

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.

Paragraph 190 states:

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Paragraph 191 states:

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

Paragraph 192 of the NPPF states that, local planning authorities 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 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.*

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 195 states that:

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

Paragraph 196 states that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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.

Paragraph 199 states:

Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Planning Practice Guide (PPG)

The Planning Practice Guide (PPG) (2014) clarifies this additional requirement under 'What is the main legislative framework for planning and the historic environment?' where it states that:

In addition to the normal planning framework set out in the Town and Country Planning Act 1990....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan. (See ID 18a-002-20140306).

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.

The PPG states under 'What is the setting of a heritage asset and how should it be taken into account?' that:

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Setting is the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we

experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).

Historic England Good Practice Advice

Historic England has produced guidance on the interpretation and implementation of the NPPF and PPG with regard to the historic environment in the form of:

- Historic Environment *Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking* (Historic England, 2015a);
- Historic Environment *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Historic England, 2015b); and
- Historic England *Good Practice Advice in Planning Note 4: Tall Buildings* (Historic England, 2015c).
- Historic England: Local Heritage Listing: Advice Note 7 (Historic England, 2016)

Reading Borough Planning Policies

The Core Strategy 2008 (with further alterations January 2015), Policy CS33: Protection and Enhancement of the Historic Environment states:

Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.

Within paragraph 11.8 of the Core Strategy it also specifies that:

The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".

Proposals

The proposed development of the re-development of the former SSE site on Vastern Road, which contains a local listed building: 55 Vastern Road. No. 55 Vastern Road was locally listed as an early 20th century office building as part of the former industrial depot complex on Vastern Road which is clearly architecturally separately identifiable and distinct from the adjacent buildings. It was probably built in connection with the wider electric works related to the electric tramways which opened in Reading in 1903 (Reading Corporation Tramways).

Paragraph 197 of the NPPF 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.

As the 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).

As stated in Paragraph 12 of Historic England's Advice Note 7 on *Local Heritage Listing*:

While local heritage listing can be a legitimate response to an actual or perceived threat to a heritage asset, including the threat of demolition, the level of protection afforded is influenced by the manner in which the local heritage list is prepared. The sounder the basis for the addition of an asset to the local heritage list – particularly the use of selection criteria – the greater the weight that can be given to preserving the significance of the asset. The degree of consultation on the list and the inclusion of assets on it also increases that weight. However, the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply that it does not currently meet the selection criteria or that it has yet to be identified.

Conclusions

The proposed development would result in the demolition of the locally listed building which would amount to substantial harm to the locally listed building.

As detailed in the supporting reasons for local listing, 55 Vastern Road is built in a style of building which is representative of Reading, enhances the sense of place and is a building of townscape quality which could be incorporated into the final design. In this case because of the preparation and publication of Reading Council's criteria and process for local listing, greater weight should be afforded to the conservation of this non-designated heritage asset in the planning balance. The current proposals to mimic the polychromatic brickwork of one arch of the locally listed building within the façade treatment of the replacement block is not considered to have any heritage benefit within the terms of Reading Policy CS33.

Summary	Please see above.		
RECOMMENDATION <i>check relevant boxes</i>		CONDITIONS Discharge	PRE-APP submission
<input type="checkbox"/> APPROVE	<input type="checkbox"/> REFUSE	<input type="checkbox"/> COMPLIES with Conditions	<input type="checkbox"/> SUPPORT PRE-APP
<input type="checkbox"/> S106 Legal Agreement		<input type="checkbox"/> NON-COMPLIANCE	<input checked="" type="checkbox"/> OBJECT PRE-APP

Relevant extracts from Pre-application meeting 2 (meeting held on 29/01/19; written advice dated 15/02/19 - included in full at document 10.6 of the Appellant's submission)

Pages 6-7

Further justification for demolition / heritage & related land use issues (as per the Barton Willmore submission received on 23/01/19)

Demolition/Heritage

In the first instance it is noted that the full observations from the Council's Historic Building Consultant are included as appendix 1 to this advice note. Accordingly, this provides an

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overview and summary of these matters. Following on from the serious concerns raised at meeting 1, it is noted that predominantly pages 29&30 of the Broadway Malyan document and the Heritage Statement seeks to respond to this. In short however, officers do not consider that all of the possible options to retain (either in full or in a somewhat altered form/scale/location) the local listed building have been evidenced to officers to date. Accordingly, it is advised at this time the demolition of the locally listed building is not supported by officers.

More specifically, it was previously advised that various options to retain the locally listed building were examined. This included those which also incorporated the re-location of the north-south link, with this possibly forming a feature of that route (with one option including development above and beyond the building. Furthermore, the options shown for the retention of 55 Vastern Road assume that it can only be retained as part of a block that extends along the whole Vastern Road frontage, and therefore the effect that this has on the north-south link forms a reason for loss of the building. It is not clear why retention of the locally-listed building necessitates a full frontage block, and why the building could not be retained as part of a slightly amended block B footprint? These options would at least need to be shown in full and assessed thereafter, because the planning balance between the loss of the building and creating the direct north-south link will be likely to form a basis in justifying the loss.

It is also recognised that at our meeting it was suggested by you that the front façade of the building could be potentially relocated elsewhere on the site. Although the Historic Buildings Consultant considers that you may wish to explore this further, at this juncture it is considered difficult to envisage how this would work successfully in practice. Therefore, significant caution is raised at this point. Should you wish to consider this further, officers would expect to be provided with details as to the practicalities as well as the actual form of such an approach.

It is also considered worthwhile clarifying that 55 Vastern Road was not locally-listed at the time of drafting the RCAAP policy, or indeed when the Local Plan policy was initially drafted. As a result, neither site allocation explicitly anticipates its retention.

In respect of your 'the principle of demolition' document (section 3 of the note received 23/01/19), it is advised that such factors are a starting point for the future officer assessment regarding whether the benefits of the development significantly outweigh the asset's significance. It is premature to provide an officer viewpoint / judgement on such a matter at this time (especially in the context of the above advice regarding not all options having yet been considered / demonstrated / evidenced). However, it is clear that such a future assessment will be in line with the second paragraph of emerging Policy EN4. In this regard, particular focus should be made to the matters explicitly referenced in the emerging Policy CR11g allocation, such as enhancing public access along and to the Thames / the high quality route including a green link. As such, ensuring that these elements are successfully incorporated will be essential in this future officer assessment.

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Appendix 1 - full version of the Historic Building Consultants observations in advance of the pre-application meeting

Memorandum: Consultee Response			
TO:	Jonathan Markwell	Direct Line:	
FROM:	Jonathan Mullis	Ext No.	
Consultee:	Historic Buildings Consultant	Dated:	23-1-19
Ref:	Pre-App 181724		
Proposal:	Re-development of former SSE site including demolition of a number of structures including locally Listed building and erection of a series of buildings to form a residential scheme (2-11 storeys) of 246 residential units, including a new north-south pedestrian link, connecting Christchurch Bridge to Vastern Road towards Reading Station.		
Location:	Former SSE Site, Vastern Road		
Consultee Response:	DWG / Doc Ref:		
Background			
Reading Borough Council guidance is provided in:			
<ul style="list-style-type: none"> • Reading Station Area Framework (RBC, 2010) • Station Hill South Planning and Urban Design Brief (RBC, 2007) 			
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core of the town were demolished to provide offices and shopping precincts. The construction of the Inner Distribution Road (the A4155), which started in 1969, improved traffic circulation but divided the town in half.

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Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

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.

Paragraph 199 states:

Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Planning Practice Guide (PPG)

The Planning Practice Guide (PPG) (2014) clarifies this additional requirement under 'What is the main legislative framework for planning and the historic environment?' where it states that:

In addition to the normal planning framework set out in the Town and Country Planning Act 1990.....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.

(See ID 18a-002-20140306).

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.

The PPG states under 'What is the setting of a heritage asset and how should it be taken into account?' that:

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Setting is the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).

Historic England Good Practice Advice

Historic England has produced new guidance on the interpretation and implementation of the NPPF and PPG with regard to the historic environment in the form of:

- Historic Environment Good Practice Advice in Planning Note 2: *Managing Significance in Decision-Taking* (Historic England, 2015a);
- Historic Environment Good Practice Advice in Planning Note 3: *The Setting of Heritage Assets* (Historic England, 2015b); and
- Historic England Good Practice Advice in Planning Note 4: *Tall Buildings* (Historic England, 2015c).
- Historic England: Local Heritage Listing: Advice Note 7 (Historic England, 2016)

Reading Borough Planning Policies

The Core Strategy 2008 (with further alterations January 2015), Policy CS33: Protection and Enhancement of the Historic Environment states:

Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in

which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.

Within paragraph 11.8 of the Core Strategy it also specifies that:

The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".

Reading Borough Council is preparing a new Local Plan, which will replace the above documents. The following policies are applicable:

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, 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.

Proposals

The proposed re-development of the former SSE site on Vastern Road, involves the demolition of a number of structures including a locally Listed Building and the erection of a series of buildings to form a residential scheme of from between 2 and 11 storeys with a new north-south pedestrian link connecting Christchurch Bridge to Vastern Road towards Reading Station.

The site contains 55 Vastern Road, which is a Locally Listed building. No. 55 Vastern Road was locally listed as 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. It was probably built in

connection with the wider electric works related to the electric tramways which opened in Reading in 1903 (Reading Corporation Tramways) and designed by the locally prominent architectural practice of Albury & Brown. F W Albury also designed the Grade II Listed Caversham Caversham Free Public Library and the Grade II Listed. The former 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 also indicates that the 1894 share issue prospectus for the Reading Electric Supply Co. Ltd shows that Albury was one of the company's directors, and thus there is every chance that his firm was responsible for the design of all its buildings. Moreover, local newspapers record that, in 1892, Mr Elisha Albury presumably some relation had established the 'Vastern Road Horse Repository'. The precise location of this enterprise is not known, but clearly the Albury family owned land here before the establishment of the Electric Works.

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.

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.

As detailed in the Heritage Statement, Kelly's Directory of Reading for 1909 gives the occupants of No. 55 as E. Rowley Hill and the Reading Electric Supply Co. Ltd. The 1912 edition provides the same listing but adds that E. Rowley Hill was the company's engineer and manager. It seems reasonable to suggest that Hill, who retired in 1915, was provided with on-site accommodation in the entrance building as part of his appointment.

Discussion

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, but this has not been included as a separate option. The proposed justification for the demolition involves the benefit of the proposals in relation to the public benefits of the scheme against the heritage value of the site. However, in this case, because of the preparation and publication of Reading Council's criteria and process for local listing, greater weight should be to the conservation of this non-designated heritage asset in the planning balance.

It is proposed to root the proposed building in the character of the locality by including proposals to mimic the polychromatic brickwork of one arch of the locally listed building within the façade treatment of the replacement block following its demolition. However, this proposal would do very little to mitigate the effect of demolishing the locally listed building and or its replacement with a large-scale building of 11 storeys.

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 12 of Historic England's Advice Note 7 on *Local Heritage Listing*:

While local heritage listing can be a legitimate response to an actual or perceived threat to a heritage asset, including the threat of demolition, the level of protection afforded is influenced by the manner in which the local heritage list is prepared. The sounder the basis for the addition of an asset to the local heritage list – particularly the use of selection criteria – the greater the weight that can be given to preserving the significance of the asset. The degree of consultation on the list and the inclusion of assets on it also increases that weight. However, the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply that it does not currently meet the selection criteria or that it has yet to be identified.

Paragraph 197 of the NPPF 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.			
Conclusions			
The proposed development would result in the demolition of a locally listed building which would amount to substantial harm to the locally listed building. The building's architectural style and aesthetic value, plus associations with the Albury & Brown architectural practice are acknowledged. The reasoning for local listing by Reading Borough Council still stands. It is therefore recommended that 55 Vastern Road, which is representative of Reading's built heritage, enhances its sense of place and is a building of townscape importance, should be incorporated into the final design.			
Summary	Please see above.		
RECOMMENDATION check relevant boxes		CONDITIONS Discharge	PRE-APP submission
<input type="checkbox"/> APPROVE	<input type="checkbox"/> REFUSE	<input type="checkbox"/> COMPLIES with Conditions	<input type="checkbox"/> SUPPORT PRE-APP
<input type="checkbox"/> S106 Legal Agreement		<input type="checkbox"/> NON-COMPLIANCE	<input checked="" type="checkbox"/> OBJECT PRE-APP

Relevant extracts from Pre-application meeting 3 (meeting held on 27/03/19; written advice dated 11/04/19 - included in full at document 10.36 of the Appellant's submission)

Pages 3-4

Heritage - Loss of the Locally Listed Building

3

It is a welcomed step that you have detailed the process of comparing various possible options for retention (in various forms), which then ultimately led you to your original conclusion that the locally listed building should be demolished. It is also noted you are seeking to incorporate echoes of 'industrial heritage' throughout the proposed redevelopment scheme. Although officer concerns are still raised in relation to the loss of the locally listed building (as outlined in detail previously), this will ultimately form part of the future officer 'planning balance' at the time of the future planning application. It is therefore strongly advised that your justification at application stage for the demolition of the building is thorough and robust. Notwithstanding the above, the general design approach to encapsulate the industrial heritage of the site as a design theme is broadly welcomed.

No relevant information from Pre-application meeting 4 (conference call on 22/05/19 - written advice dated 05/06/19 - included in full at document 10.63 of the Appellant's submission)

Relevant extracts from Pre-application meeting 5 (meeting held on 03/10/19; written advice dated 07/10/19 - included in full at document 10.79 of the Appellant's submission)

Page 9

Heritage

The proposals continue to seek the demolition of a locally listed building. As per previous advice, this remains a concern for officers and would ultimately form part of the future 'planning balance' in the assessment of any formal application. Previously the proposals sought to include echoes of the locally listed building in the proposed design approach at parts of the site; on first glance this does not appear to be continuing in the current iteration of the proposals. Naturally it would be anticipated that your future full submission will pick up on all relevant heritage matters at that time.

Standalone café

Officers welcome the principle of a small café unit within a standalone space and consider that this has the potential to be an attractive benefit of the emerging proposals. In principle this would comply in providing the "small scale leisure" component referenced in the CR11g allocation. Obviously it will be for you to detail to exact use(s) sought (it could be that flexible uses could assist the attractiveness of the unit to potential future occupiers) and, in particular, the servicing arrangements associated with such a unit in this location (which appears on first glance to be distant from vehicular access points). Officers would expect detailed information to be submitted to detail such practicalities, in order to demonstrate the suitability of the use in the location sought (or put another way, measures to ensure that it does not become difficult to let / becomes a vacant unit & possible negative consequential impacts).

Other RBC Transport officer comments

In addition to matters already referenced above, the following further transport based comments are raised:

- It has been requested that a strip of land be secured along the towpath to increase its width at the point at which the bridge adjoins the towpath. An exact depth has not yet been agreed but this will be provided as soon as an assessment has been undertaken. This is in order to make associated improvements to the towpath at that point.
- The proposals should include the location of the crossing point on Vastern Road and this will need to identify how this will link with the existing arrangements for the current retail park site to the south (who undertook a public exhibition event in September 2019 - Barton Willmore are the Planning Consultants). You are also strongly

Relevant extracts from Pre-application meeting 6 (meeting held on 25/11/19; written advice dated 12/12/19)

Page 7

Heritage

Little additional details have been provided in this regard. It is noted that the latest CGIs include an arched brickwork detail in roughly the same location as the existing locally listed building on Vastern Road. The choice of location is acknowledged, but the fact that it serves a private lounge (rather than an entrance) means it is queried whether it would be more appropriate for this to be incorporated at the actual shared entrances to blocks?

Standalone café

Officers can advise of no strong preference one way or the other in terms of the D:SE suggestion for the standalone building to have a character of its own. There are considered to be benefits and drawbacks to both approaches, with justified narratives being likely to be able to be progressed in each instance by you.

Waste Services comments

These were fed into you via email on 25th November, subsequent to our meeting. In the interests of brevity, the comments are not repeated in this note. Please liaise directly with Alice Layzell prior to your future submission (including scope for a possible meeting) and copy me into any correspondence for my information. Alice will naturally be formally consulted at the time of the future application.

Residential mix and affordable housing



Historic England

Managing Significance in Decision-Taking in the Historic Environment

Historic Environment Good Practice Advice in Planning: 2



This document was produced by Historic England in collaboration with the Historic Environment Forum, and with the particular assistance of:

Association of Local Government Archaeological Officers

British Property Federation

Council for British Archaeology

Chartered Institute for Archaeologists

Country Land and Business Association

Civic Voice

Heritage Alliance

Historic Houses Association

Historic Towns Forum

Institute of Historic Buildings Conservation

National Trust

It is one of three related Good Practice Advice (GPA) Notes, along with GPA1 *The Historic Environment in Local Plans* and GPA3 *The Setting of Heritage Assets*.

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Introduction

1 The purpose of this Historic England Good Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the **National Planning Policy Framework (NPPF)** and the related guidance given in the **Planning Practice Guidance (PPG)**. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

2 This good practice advice acknowledges the primacy of relevant legislation and the NPPF and PPG, and is intended to support the implementation of national policy. It does not however constitute a statement of Government policy, nor does it seek to prescribe a single methodology or particular data sources. In order to gain a full understanding of the relevant issues, this document should be read in conjunction with the relevant legislation, national planning policy and guidance (the NPPF and PPG), as well as Good Practice Advice Note 1 (*The Historic Environment in Local Plans*) and Good Practice Advice Note 3 (*The Setting of Heritage Assets*) and other Historic England Advice Notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives.

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.

General advice on decision-taking

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.

6 Both the NPPF (paragraph 188) and the PPG (section ID20) highlight early engagement and pre-application discussion. Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed. As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the

assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate:

For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary.

- Understand the significance of the affected assets
- Understand the impact of the proposal on that significance
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected

The assessment of significance as part of the application process

7 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 early in the process is very important to an applicant in order to conceive of and design a successful development and to the local planning authority in order to make decisions in line with legal requirements and the objectives of the development plan and the policy requirements of the NPPF.

8 Understanding the **nature of the significance** is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.

9 Understanding the **extent of that significance** is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

10 Understanding the **level of significance** is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.

11 To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

12 Although there are many sources of information and methods for assessing significance and impact upon it, the most common steps an applicant might take are as follows. The first three steps are almost always necessary:

- 12.1 Examine the asset and its setting (see GPA 3).
- 12.2 Check:
 - a the Local Development Plan, evidence base and policies
 - b main local, county and national records including the relevant Historic Environment Record (see [paragraph 21](#)),
 - c statutory (these can be accessed via the [National Heritage List for England](#)) and local lists
 - d the [Heritage Gateway](#)
 - e the [Historic England Archive](#), and
 - f other relevant sources of information that would provide an understanding of the history of the place and the value the asset holds for society, for example historic maps, conservation area appraisals, townscapes studies or the urban archaeology database
- 12.3 Consider whether the nature of the significance of the affected assets requires an expert assessment to gain the necessary level of understanding; where there is archaeological interest (including buildings, areas and wreck sites), consider whether it requires a desk-based assessment to understand the significance. It is good practice to use professionally accredited experts and to comply with relevant standards and guidance. To find a list of expert groups, see [paragraph 19](#).

A **desk-based assessment** will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so. See the relevant [standards and guidance](#) provided by the Chartered Institute for Archaeologists (CIfA).

CIfA Standard and Guidance: Historic Environment Desk Based Assessment 2014

- 12.4 In order to ensure that the scope of the assessment or evaluation meets the requirements of the local planning authority (LPA) and avoids the risk of damage to heritage assets, it is good practice to discuss the scope of the work with the LPA in advance and to agree a written scheme of investigation (WSI), if necessary, before commencement, thus precluding abortive work.
- 12.5 Carry out additional investigations if initial research has established an archaeological, architectural, artistic, and/or historic interest but where the extent, nature or importance needs to be established more clearly before decisions can be made about change to the site. This may include documentary research.

For example, see *Understanding Place: An Introduction*, *Understanding Place: Historic Area Assessments in a Planning and Development Context*, *Understanding Place: Historic Area Assessment – Principles and Practice* (all 2010: English Heritage).

12.6 Where an archaeological desk-based assessment is insufficient to assess the archaeological interest of a heritage asset fully, consider whether an on-site field evaluation would provide the necessary information.

An **archaeological field evaluation** will determine, as far as is reasonably possible, the nature of the archaeological resource within a specified area using appropriate methods and practises, including: geophysical survey, physical appraisal of visible structures and/or trial trenching for buried remains.

CIfA Standard and Guidance: Evaluation.

See also *Mineral Extraction and Archaeology: A Practice Guide*, English Heritage on behalf of the Minerals Historic Environment Forum, 2008.

12.7 Consider, in the case of buildings, whether physical intervention such as the selected removal of non-historic plaster, may be helpful to reveal important details hidden behind later additions and alterations bearing in mind that such investigations should be proportionate to the significance. Most evaluation of significance in buildings is likely to be based on a mixture of documentary research and non-intrusive examination of fabric but where the significance lies below-ground or more deeply concealed in a building's fabric, a greater level of intrusive investigation may be required.

For further information on the investigation of historic buildings, see *Understanding Historic Buildings: A Guide to Good Recording Practice* (2006), *Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities* (2008 - both English Heritage) and CIfA Standard and Guidance: *Archaeological Investigation and Recording of Standing Buildings or Structures*.

12.8 Establish whether any investigative work may itself require listed building consent, scheduled monument consent or other permissions.

Conservation Principles and assessment

13 The reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in *Conservation Principles* (2008). *Conservation Principles* identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.

14 Assessment of significance, on a UK wide basis, is also covered in Part 4 of British Standard 7913:2013 *Guide to the Conservation of Historic Buildings*.

Curtilage structures

15 Some buildings and structures are deemed designated as listed buildings by being fixed to the principal building or by being ancillary within its curtilage and pre-dating 1 July 1948. Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (ie the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance. **Listed buildings** designated very recently (after 25 June 2013) are likely to define curtilage definitively; where this is (or is not) the case will be noted in the list description.

Archaeological and historic interest

16 Archaeological interest, as defined in the NPPF, differs from historic interest because it is the prospects for a future expert archaeological investigation to reveal more about our past that need protecting. Caring for an asset that has a well-understood historic interest, but no substantial archaeological interest, will be relatively straightforward as our existing knowledge of the asset will guide how it can be managed in order to sustain its significance. However, if for example there is good reason to suspect that a bare field which has never been investigated contains important remains, or that an apparently ordinary building contains a hidden medieval timber-frame, the task of managing it would be different.

Historic interest is an interest in what is already known about past lives and events that may be illustrated by or associated with the asset.

17 Where a heritage asset is thought to have archaeological interest, the potential knowledge which may be unlocked by investigation may occasionally be harmed by even minor disturbance, thus damaging the significance of the asset. This can make some assets, or parts of them, very sensitive to change. Expert advice will be needed to identify these sensitivities and assess whether and how they can be worked around (see [paragraphs 20 - 23](#)), however, a proportionate approach should be maintained. It has been estimated that disturbance would have an adverse impact in less than 3% of all planning applications currently (Information from forthcoming ALGAO casework survey (to be published summer 2015)).

The archaeological interest of an asset can remain even after apparently thorough investigation. As techniques and the understanding of our past improve, a previously investigated asset may be revisited to see what further can be learned.

Using appropriate expertise

18 Expert advice on where the significance lies and its sensitivity to change can unlock viable uses for the asset and secure its long-term future. It can also be very valuable in minimising and mitigating impact, therefore avoiding conflicts between the owner's reasonable aspirations for the site and its conservation, particularly if it is sought early. Where the proposal is likely to affect the significance of heritage assets, early engagement with appropriate expert advice and the relevant local authority heritage advisers will be helpful both in developing an understanding of significance and in identifying the level of information needed to support the application and can be helpful throughout the process. National amenity societies and local groups, such as civic and historical societies, museums and local records/archives can also be particularly valuable sources of advice and information. Where a heritage asset may have a cultural or faith interest to a particular community, it is important to consult them as their views and information may add to the understanding of the asset's significance.

19 There are several established registers that can be used to identify appropriately qualified specialists or organisations, depending on the nature of the project. Though not exhaustive, the alphabetical list below may be helpful:

Architects Accredited in Building Conservation Ltd operates a register of specialist architectural heritage expertise.

The **Chartered Institute for Archaeologists (CIfA)** has a register of accredited organisations for historic environment practice. CIfA requires its members to meet defined levels of competence. www.archaeologists.net/ro

The **Institution of Civil Engineers and the Institution of Structural Engineers** operate a joint register of engineers (Conservation Accreditation Register for Engineers - CARE) who have demonstrated to their peers that they meet a required standard in conservation.

The **Institute for Conservation (ICON)** operates a register of accredited conservator-restorers.

The **Institute of Historic Building Conservation (IHBC)** has a register of accredited organisations for historic environment practice. The IHBC requires its members to meet defined levels of competency. www.ihbc.org.uk/hespr/

The **Royal Institute of British Architects** also operates a register of architects accredited in building conservation, for works on listed buildings, scheduled monuments and pre-1900 buildings.

The **Royal Institution of Chartered Surveyors** maintains a register of accredited building conservation surveyors.

20 Some projects may need more than one type of specialist and, indeed, others, for instance planners and architectural historians.

Finding appropriate information: Historic Environment Records (HERs)

21 To ensure sustainable development, local planning authorities need to have access to HERs that are publicly-accessible and dynamic sources of information about the local historic environment, its archaeological remains, architecture and town- and landscape of all periods. They need to provide an up-to-date catalogue of heritage assets and interventions within a defined geographical area. They will assist in informing good planning decisions by providing information about the historic environment, complementary to that provided by museums, archives and libraries, to communities, owners and developers. As an information service managed by dedicated specialist staff, they consist of databases, indexes and reference collections linked to a Geographical Information System (GIS) and thus provide core information for plan-making, designation and development management decisions in the planning system as set out in the NPPF, as well as decisions relating to environmental stewardship schemes (details can be found at: www.heritagegateway.org.uk/Gateway/CHR).

22 An effective HER is likely to contain information on the following:

- 22.1 Designated heritage assets.
- 22.2 Locally designated heritage assets.
- 22.3 Heritage assets with archaeological interest that are neither nationally nor locally designated (including assets that are known to have been demolished or destroyed or known only from antiquarian sources, assets which do not meet the criteria for national or local designation, and those which have yet to be formally assessed as such).

- 22.4 Other heritage assets with historic, architectural and artistic interest that are of local significance (including undesignated historic buildings, parks and gardens and historic places commemorating events and people).
- 22.5 Findspots.
- 22.6 Archaeological objects and their findspots under the Portable Antiquities Scheme.
- 22.7 Investigations of the archaeological, architectural, historic or artistic interest of a place or landscape, including desk-based assessments, field evaluations, excavation reports, archaeological watching briefs, environmental assessments, conservation management plans and assessments, reports on significance from Design and Access Statements, record reports on buildings, conference notes and proceedings, etc.
- 22.8 Historic area assessments and characterisation studies, urban archaeological databases, conservation area appraisals and management plans.
- 22.9 Output from the National Mapping Programme (NMP).
- 22.10 Scientific data relevant to the understanding of heritage assets such as borehole logs, absolute dating and palaeoenvironmental data.
- 22.11 Documentation, such as Listed Building Heritage Partnership Agreements, Local Listed Building Consent Orders and (National) Listed Building Consent Orders, which derive from changes to the Planning (Listed Building and Conservation Areas) Act 1990 under the Enterprise and Regulatory Reform Act 2013.

23 HERs will usually be defined by the administrative boundaries (whether terrestrial, inter-tidal or marine) of the local authority(-ies) that an HER covers. To ensure useful coverage in all types of planning casework, HERs are encouraged to consult user groups regularly and take account of their information requirements in sourcing material.

24 Information generated in putting together the local plan, during the process of applying for consent and in the discharging of conditions placed on consents will often provide new evidence of the state and significance of the historic environment. It can be invaluable in plan-making and decision-making in the future and is of significant public benefit in furthering the understanding of our surroundings and our past. This information should be made publicly accessible, usually through the Historic Environment Record.

Assessing the proposals

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](#).

26 Successful sustainable development achieves economic, social and environmental gains jointly and simultaneously through planning decisions (NPPF, Paragraph 8). If there is any apparent conflict between the proposed development and the conservation of a heritage asset then the decision-maker might need to

consider whether alternative means of delivering the development benefits could achieve a more sustainable result, before proceeding to weigh benefits against any harm. For example, raft foundations can span archaeological deposits, so minimising both the physical impact and the costs associated with excavation.

27 Substantial harm is a high test which may not arise in many cases. In those cases where harm or loss is considered likely to be substantial (NPPF, Paragraph 132 & PPG 01-7), then the LPA will need to consider the relevant NPPF tests. Further detail on the tests on levels of harm can be found at paragraphs 133-135 and 139 of the NPPF. Further guidance on heritage conservation as a public benefit in itself, optimum viable use, levels of harm and mitigating harm are given in the PPG section ID 18a, paragraphs 15 to 20.

Cumulative impact

28 The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

Listed building consent regime

29 Change to heritage assets is inevitable but it is only harmful when significance is damaged. The nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be needed if it is to go ahead. In the case of listed buildings, the need for owners to receive listed building consent in advance of works which affect special interest is a simple mechanism but it is not always clear which kinds of works would require consent. In certain circumstances there are alternative means of granting listed building consent under the Enterprise & Regulatory Reform Act 2013.

Further advice is given in Historic England Advice Note *Making Changes to Heritage Assets* (forthcoming).

For the Enterprise and Regulatory Reform Act 2013 see: www.legislation.gov.uk/ukpga/2013/24/contents/enacted

Decision-taking for assets with archaeological interest

30 Many heritage assets have a significance that is a combination of historic, architectural, artistic and archaeological interest. However, some will currently hold only an archaeological interest, in that nothing substantial may be known about the site and yet there is a credible expectation that investigation may yield something of strong enough interest to justify some level of protection.

31 For sites with archaeological interest, whether designated or not, the benefits of conserving them are a material consideration when considering planning applications for development.

Recording and furthering understanding

32 If a decision in principle is made to allow a proposal that would cause the loss of an asset (either wholly or in part), developers are required to record and advance our understanding of the significance of the asset or the relevant part in a manner proportionate to its importance and the potential impact (NPPF, Paragraph 141). Nevertheless, records cannot deliver the sensory experience and understanding of context provided by the original heritage asset, so the ability to investigate and record a heritage asset is not a factor in deciding whether consent for its destruction should be given.

33 Developers are more likely to achieve the NPPF objective if the recording is undertaken by a professionally accredited organisation or individual with appropriate expertise and that it complies with professional standards and guidance and takes account of relevant research frameworks.

Accredited members:

The ClfA maintains a Register of accredited organisations and holds a directory of members:

www.archaeologists.net/ro

Guidance:

ClfA Standard and Guidance: *Evaluation; Watching Briefs; Archaeological Excavation and Archaeological Investigation and Recording of Standing Buildings or Structures.*

Mineral Extraction and Archaeology: A Practice Guide, English Heritage on behalf of the Minerals Historic Environment Forum, 2008.

Understanding Historic Buildings: a guide to good recording practice. English Heritage 2006.

Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities English Heritage 2008.

Local authority archaeological advisers may have additional, locally specific guidance.

Research Frameworks:

See: www.HistoricEngland.org.uk/research/support-and-collaboration/research-resources/research-frameworks/

Written Schemes of Investigation (WSI)

34 In those cases where development will lead to loss of a substantive part of the significance of a heritage asset, the steps to be taken by the developer to achieve the NPPF requirements are best controlled through a WSI, although given the number of planning applications likely to have an adverse impact such an investigation may not be required in many cases. A WSI is usually commissioned by the applicant and approved by the LPA. The planning authority will need to satisfy itself that any WSI is set out to a level of detail proportionate to the asset's likely significance and in accordance with appropriate standards and is flexible enough to be able to take account of reasonable and unavoidable changes or unexpected discoveries. WSIs are used to set out proposals for assessment and evaluation, as well as post-permission investigation and recording.

35 The LPA (and their heritage advisers) can advise as to what the WSI should cover; additional guidance is also available, for example through ClfA standards and guidance. Schemes normally include:

- Background information and context relating to existing understanding and the purpose of the investigation
- Proposals for the site investigation, including statements on research objectives, methodology and community engagements
- Proposals for the assessment, analysis, publication, dissemination, archiving and curation of the results of the investigation. Assessment and analysis may need to be a two stage process with detailed proposals for investigation and analysis being agreed following completion of the assessment stage

- Operational matters including timetable, resourcing, expertise of those undertaking the work, compliance with professional standards and legislative or regulatory requirements

Archaeological conditions and obligations for WSIs

36 A requirement to record the significance of a heritage asset with archaeological interest that will be harmed may be made enforceable through conditions, a planning obligation or a combination of the two (see Paragraphs 203-206 of the NPPF). The use of conditions or obligations can be applied where the legal and policy tests in the NPPF have been met, and it has been established that sustainable development can only be achieved through harm to a heritage asset. An approach for using conditions to identify and secure the appropriate level of work is set out below. Depending on the nature of the proposals and the heritage assets affected, the timing of submission of details relating to works (ie in this case the WSI), their approval and implementation may need to be tied to the phases of development or occupation. Information requirements should also be tailored to the development.

37 The following is suggested as an example condition which can be helpful to identify and to secure the appropriate level of work that is necessary before commencement of the development, and also what may be required after commencement and in some cases after the development has been completed. The staged approach to discharge can therefore help to avoid problems for developers with the delay of fully discharging pre-commencement conditions such as where lengthy programmes of archaeological work are secured by a single clause pre-commencement condition. Care will be needed to ensure the conditions are enforceable and otherwise comply with the NPPF. A planning obligation may be needed in certain circumstances:

- No demolition/development shall take place/commence until a written scheme of investigation (WSI) has been [submitted to and] approved by the local planning authority in writing. For land that is included within the WSI, no demolition/development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, **and**
- The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Reporting, publication and archiving

38 Where the local planning authority has indicated that a report detailing the findings of the investigation shall be published, it is helpful to consider the following points:

- The best means of publication to reach target audiences, dependent upon the nature of the findings
- For important sites, the publication of detailed findings to an appropriate and proportionate level through books, archaeological, architectural or historical journals or via the internet
- The general structure, length and format of the report including summaries

39 Local planning authorities are advised to ensure that the compilation, deposition and appropriate conservation of the material, digital and documentary archive in a museum, or other publicly accessible repository willing and capable of preserving it, forms an integral part of any recording project. Securing the archive of an investigation according to the terms of deposition or guidelines issued by the receiving body will facilitate future research. Proposals for these stages of work will have been included in the WSI but may need to be updated following completion of the on-site investigation.

40 The ClfA publishes standards and guidance for the creation, compilation, transfer and deposition of archaeological archives (ClfA Standard and Guidance: *Archives*), while advice is also available from the Museums Association and individual museums and archives. Deposition of copies of reports and site summaries with the HER is vital in providing an evidence base that can be called on by applicants for future development and by planners when drawing up plans and making decisions, as well as being important to local communities. Advice on the content of site summaries may be available from the HER.

Human remains

41 There are important, additional legal requirements that apply where development or on-site evaluation may affect human remains and it is advisable to follow established professional guidelines. Further guidance on compliance with burials legislation is available from the Ministry of Justice and [Historic England](#).

Mineral extraction

42 Archaeological interest is often of particular importance in proposals for minerals extraction. The Minerals and Historic Environment Forum has published *Mineral Extraction and Archaeology: a Practice Guide* (2008) to provide guidance on minerals planning and archaeology. This is currently being updated given the subsequent publication of the NPPF.

Public engagement

43 Where appropriate, local planning authorities and the developer are advised to consider the benefits of making the investigative works open to and interpreted for the public and to include that as part of the WSI. The results can contribute to a deeper sense of place, ownership and community identity. Promoting understanding will increase active protection for the historic environment. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

Unexpected discoveries during work

44 Where a new heritage asset is discovered or an existing known asset proves to be more significant than foreseen at the time of application, the local planning authority is advised to work with the developer to seek a proportionate solution that protects the significance of the new discovery, so far as is practical, within the existing scheme. Developers are advised to incorporate the potential for unexpected discoveries into their risk-management strategies.

Scheduled monument consent

45 [Guidance on scheduling and scheduled monument consent](#) is published by DCMS. Scheduled monument consent is a separate approval process from the planning system.

Neglect

45 While most disrepair is not deliberate neglect, and while LPAs need to be wary of delaying sympathetic proposals which would give the heritage asset a future, where an owner appears to have permitted a heritage asset to deteriorate deliberately in the hope of making consent or permission easier to gain, the local planning authority will need to disregard the deteriorated state of the asset. In all other cases the condition of the property and its impact on viability can be a material consideration.

46 Working with the owner is the route to solving heritage at risk issues and informal approaches to the owner are the normal starting point. LPAs may need to consider exercising their repair and compulsory purchase powers to remedy neglect, deliberate or otherwise (NPPF, Paragraphs 126 and 207). The potential to exercise these powers as an alternative means of conserving a heritage asset could be a material consideration in determining applications (see: [Stopping the Rot: A Guide to Enforcement Action to Save Historic Buildings](#)).

Unauthorised works, enforcement notices and prosecution

47 The objective of conserving heritage assets for generations to come will not be met if there is no deterrent to those contemplating not applying for a consent and no remedy applied when consents are not sought when they should have been. Wrongdoing should obviously not be rewarded and those who obey the law should not be disadvantaged. Local planning authorities may, where it is expedient and in the public interest, consider the following steps, as appropriate: to remind people of the need for consents; to investigate and prosecute breaches of the law; and, to remedy the effects of any wrongdoing using their enforcement powers. The strategy for enforcement in the historic environment would form part of the 'local enforcement plan' (NPPF, Paragraph 207).

48 Carrying out works that affect the special interest of a listed building and the demolition of a building in a conservation area without consent are both criminal offences. Expert heritage advice should be sought if there is any doubt as to whether consent should be obtained and, if in doubt owners are encouraged to talk to their LPA before works are undertaken. Although scheduled monument consent is a separate regime, unauthorised works are a criminal offence under the Ancient Monuments and Archaeological Areas Act 1979.

Marketing to demonstrate redundancy

49 Excepting those which, by their nature, have limited or no economic end use, total loss or substantial harm to a designated heritage asset may be justified where certain conditions apply (NPPF, Paragraph 133). Marketing is required to demonstrate redundancy as expert evidence of possible purchasers and their intended uses for the site can never be conclusive and the seriousness of the proposed harm justifies the time taken in the marketing exercise (See section 4.7 of *Enabling Development and the Conservation of Significant Places* – English Heritage, 2008).

50 No-one is obliged to sell their property. The aim of a marketing exercise is to reach all potential buyers who may be willing to find a use for the site that still provides for its conservation to some degree. If such a genuine purchaser comes forward who would be willing to maintain the asset, there is no obligation to sell to them, of course, but redundancy will not have been demonstrated. To ensure that those marketing efforts have been genuine and given the best chance of succeeding, local planning authorities may consider the following aspects of the campaign in order to judge its merits:

- a **The timing of the marketing.**
Paragraph 133 of the NPPF requires that there is clear evidence that no viable use can be found in the 'medium term'. Under poor market conditions the applicant may wish to consider whether 'mothballing' the asset might be appropriate until conditions have improved to the point when a negative response can be reasonably ascribed to a genuine lack of interest in the asset itself rather than to general market conditions.
- b **The period and means of marketing.**
These will be set to give the best chance of reaching all categories of potential purchaser.

- c **The asking price.**
A price that does not fairly reflect the market value of the heritage asset will deter enquiries.
- d **Condition of the site and deliberate neglect.** To test the market adequately the price would need to reflect the cost of any works needed to repair the asset. Deterioration from deliberate neglect of the asset in the hope of obtaining consent should be ignored. This means that if the cost of making good the deterioration from deliberate neglect is greater than any value the site may have had without the neglect, the applicant is unlikely to be able to demonstrate that the asset would have been unviable in the assumed condition that the policy requires.
- e **The extent of the land included and nature of the interest being marketed.**
The land being offered needs to be sufficient to provide necessary infrastructure; if a lease rather than freehold is offered and it is too short or has otherwise onerous terms genuine interest may be deterred.

Public or charitable interest and support for assets under threat

51 Where there are no expressions of interest in the general market for maintaining the asset, reasonable endeavours will need to be made to see if there is a public or charitable organisation willing to take on the asset and to find grant-funding that may pay for its continued conservation. This might include approaching the local authority, Historic England, the Heritage Lottery Fund, the Architectural Heritage Fund (who maintain a list of possible alternative sources of funding), charitable foundations, national and local amenity societies and preservation trusts.

Opportunities to enhance assets, their settings and local distinctiveness

52 Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and local distinctiveness

53 Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size

- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

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Historic England

We are the public body that looks after England's historic environment. We champion historic places, helping people understand, value and care for them.

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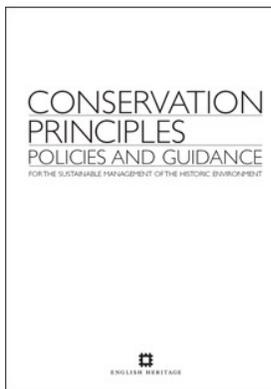
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Historic England

Conservation Principles, Policies and Guidance



On 1st April 2015 the Historic Buildings and Monuments Commission for England changed its common name from English Heritage to Historic England. We are now re-branding all our documents.

Although this document refers to English Heritage, it is still the Commission's current advice and guidance and will in due course be re-branded as Historic England.

[Please see our website](#) for up to date contact information, and further advice.

We welcome feedback to help improve this document, which will be periodically revised. Please email comments to guidance@HistoricEngland.org.uk

We are the government's expert advisory service for England's historic environment. We give constructive advice to local authorities, owners and the public. We champion historic places helping people to understand, value and care for them, now and for the future.

HistoricEngland.org.uk/advice

CONSERVATION
PRINCIPLES
POLICIES AND GUIDANCE
FOR THE SUSTAINABLE MANAGEMENT OF THE HISTORIC ENVIRONMENT



ENGLISH HERITAGE

FOREWORD

The sustainable management of the historic environment depends on sound principles, clear policies and guidance based on those principles, and the quality of decisions that stem from their consistent application. We need a clear, over-arching philosophical framework of what conservation means at the beginning of the 21st century; and to distil current good practice in casework, given the impending reform of legislation and the need for more integrated practice.

These *Principles, Policies and Guidance* for the sustainable management of the historic environment have been developed through extensive debate and consultation, both within English Heritage and with colleagues in the historic environment sector and beyond. Our main purpose in producing the *Principles, Policies and Guidance* is to strengthen the credibility and consistency of decisions taken and advice given by English Heritage staff, improving our accountability by setting out the framework within which we will make judgements on casework. Our success will also be measured by the extent to which this document is taken up more widely in the sector.

Over time, and in conjunction with legislative reform and improving capacity in the sector, we hope that the document will help to create a progressive framework for managing change in the historic environment that is clear in purpose and sustainable in its application – constructive conservation.



Lord Bruce-Lockhart

Chairman
English Heritage
April 2008

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DEFINITIONS

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Using this document

- 1 English Heritage sets out in this document a logical approach to making decisions and offering guidance about all aspects of England's historic environment. This will help us to ensure consistency in carrying out our role as the Government's statutory advisor on the historic environment.
- 2 As the **Introduction** (pages 13-16) explains, we have avoided using the terminology of current heritage designations. Instead, we have adopted the term 'place' for any part of the historic environment that can be perceived as having a distinct identity.
- 3 The **Conservation Principles** (pages 19-24) provide a comprehensive framework for the sustainable management of the historic environment, under six headlines:
 - Principle 1: The historic environment is a shared resource
 - Principle 2: Everyone should be able to participate in sustaining the historic environment
 - Principle 3: Understanding the significance of places is vital
 - Principle 4: Significant places should be managed to sustain their values
 - Principle 5: Decisions about change must be reasonable, transparent and consistent
 - Principle 6: Documenting and learning from decisions is essential
- 4 We define *conservation* (under Principle 4.2) as the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.
- 5 **Understanding the values** (pages 27-32) describes a range of *heritage values*, arranged in four groups, which may be attached to places. These are:
 - Evidential value: the potential of a place to yield evidence about past human activity.
 - Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
 - Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
 - Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

- 6 Assessing heritage significance** (pages 35-40) sets out a process for *assessing the heritage significance* of a place:
- Understand the fabric and evolution of the place
 - Identify who values the place, and why they do so
 - Relate identified heritage values to the fabric of the place
 - Consider the relative importance of those identified values
 - Consider the contribution of associated objects and collections
 - Consider the contribution made by setting and context
 - Compare the place with other places sharing similar values
 - Articulate the significance of the place.
- 7 Managing change to significant places** (pages 43-48) explains how to apply the *Principles* in **making decisions** about change to significant places by:
- Establishing whether there is sufficient information to understand the impacts of potential change
 - Considering the effects on authenticity and integrity
 - Taking account of sustainability
 - Considering the potential reversibility of changes
 - Comparing options and making the decision
 - Applying mitigation
 - Monitoring and evaluating outcomes.
- 8 English Heritage Conservation Policies and Guidance** (pages 51-63), a series of *Policies* specific to some common kinds of action, followed by associated *Guidance* on their interpretation. While some of these policies have a close relationship to particular principles, it is important that they are interpreted in the context of the *Principles* as a whole. These policies, which English Heritage will follow, are that:
- 9** The conservation of significant places is founded on **appropriate routine management and maintenance**.
- 10** **Periodic renewal** of elements of a significant place, intended or inherent in the design, is normally desirable unless any harm caused to heritage values would not be recovered over time.
- 11** **Repair** necessary to sustain the heritage values of a significant place is normally desirable if:
- a. there is sufficient information comprehensively to understand the impact of the proposals on the significance of the place; and
 - b. the long term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future; and
 - c. the proposals are designed to avoid or minimise harm, if actions necessary to sustain particular heritage values tend to conflict.

- 12 Intervention in significant places primarily to increase knowledge of the past involving material loss of evidential values, should normally be acceptable if:
- a. preservation *in situ* is not reasonably practicable; or
 - b. it is demonstrated that the potential increase in knowledge
 - cannot be achieved using non-destructive techniques; and
 - is unlikely to be achieved at another place whose destruction is inevitable; and
 - is predicted decisively to outweigh the loss of the primary resource.

This policy most commonly applies to research excavation.

- 13 Restoration to a significant place should normally be acceptable if:
- a. the heritage values of the elements that would be restored decisively outweigh the values of those that would be lost;
 - b. the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence;
 - c. the form in which the place currently exists is not the result of an historically-significant event;
 - d. the work proposed respects previous forms of the place;
 - e. the maintenance implications of the proposed restoration are considered to be sustainable;
- 14 New work or alteration to a significant place should normally be acceptable if:
- a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
 - b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
 - c. the proposals aspire to a quality of design and execution which may be valued now and in the future;
 - d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.

- 15** Changes which would **harm the heritage values of a significant place** should be unacceptable unless:
- a. the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;
 - b. there is no reasonably practicable alternative means of doing so without harm;
 - c. that harm has been reduced to the minimum consistent with achieving the objective;
 - d. it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering:
 - its comparative significance,
 - the impact on that significance, and
 - the benefits to the place itself and/or the wider community or society as a whole.
- 16** **Enabling development** to secure the future of a significant place should be unacceptable unless:
- a. it will not materially harm the heritage values of the place or its setting
 - b. it avoids detrimental fragmentation of management of the place;
 - c. it will secure the long term future of the place and, where applicable, its continued use for a sympathetic purpose;
 - d. it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid;
 - e. sufficient subsidy is not available from any other source;
 - f. it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests;
 - g. the public benefit of securing the future of the heritage asset through such enabling development decisively outweighs the disbenefits of breaching other public policies.
- 17** We conclude with a general statement about **Applying the Principles** (page 67), acknowledging that the cultural and natural heritage values of significant places, including those reflected in landscape designations, should be managed in parallel, fostering close working relationships between cultural and natural heritage interests. Finally, we provide a set of key **Definitions** (pages 71-72).

INTRODUCTION

Aims

- 18** The historic environment is central to England's cultural heritage and sense of identity, and hence a resource that should be sustained for the benefit of present and future generations. English Heritage's aim in this document is to set out a logical approach to making decisions and offering guidance about all aspects of the historic environment, and for reconciling its protection with the economic and social needs and aspirations of the people who live in it.
- 19** The *Conservation Principles, Policies and Guidance* are primarily intended to help us to ensure consistency of approach in carrying out our role as the Government's statutory advisor on the historic environment in England. Specifically, they make a contribution to addressing the challenges of modernising heritage protection by proposing an integrated approach to making decisions, based on a common process. The *Principles* look forward to the consolidated framework of heritage protection proposed in the White Paper *Heritage Protection for the 21st Century* (March 2007), but their application is not dependent upon it.
- 20** The *Principles* will inform English Heritage's approach to the management of the historic environment as a whole, including the community engagement, learning and access issues addressed under Principle 2. The *Policies and Guidance* will specifically guide our staff in applying the *Principles* to English Heritage's role in the development process, and in managing the historic sites in our care. We hope, of course, that, like all our guidance, the *Principles* will also be read and used by local authorities, property owners, developers, and their advisers. In due course, the *Principles, Policies and Guidance* will be supported by further, more detailed guidance about particular types of proposal or place, and current English Heritage guidance will make specific reference to them as it is updated.

Terms and concepts

- 21** The practice of recognising, formally protecting and conserving particular aspects of the historic environment has developed along parallel paths, trodden by different professional disciplines. The lack of a common, 'high level' terminology has been a barrier to articulating common principles, and using them to develop a more integrated approach. We have therefore deliberately avoided the specialised terminology of current law and public policy relating to heritage designations, such as 'listed building' and 'scheduled monument'. We use the word 'place' as a proxy for any part of the historic environment, including under the ground or sea, that people (not least practitioners) perceive as having a distinct identity, although recognising that there is no ideal term to cover everything from a shipwreck to a landscape.

- 22 The term 'place' goes beyond physical form, to involve all the characteristics that can contribute to a 'sense of place'. It embraces the idea that places, of any size from a bollard to a building, an historic area, a town, or a region, need to be understood and managed at different levels for different purposes; and that a particular geographical location can form part of several overlapping 'places' defined by different characteristics. Similarly, we have stretched the concept of 'fabric', commonly used to describe the material from which a building is constructed, to include all the material substance of places, including geology, archaeological deposits, structures and buildings, and the flora growing in and upon them. 'Designation' embraces any formal recognition of heritage value, including registration, listing, scheduling and inscription.
- 23 Our approach anticipates the proposed consolidation of national cultural heritage protection and, more importantly, avoids the suggestion that the *Principles* are concerned only with places that meet the particular thresholds of significance necessary for formal international, national or local designation. Beyond heritage designations, in the wider framework of environmental management and spatial planning, an understanding of the heritage values a place may have for its owners, the local community and wider communities of interest should be seen as the basis for making sound decisions about its future.
- 24 Sustainable management of a place begins with understanding and defining how, why, and to what extent it has cultural and natural heritage values: in sum, its significance. Communicating that significance to everyone concerned with a place, particularly those whose actions may affect it, is then essential if all are to act in awareness of its heritage values. Only through understanding the significance of a place is it possible to assess how the qualities that people value are vulnerable to harm or loss. That understanding should then provide the basis for developing and implementing management strategies (including maintenance, cyclical renewal and repair) that will best sustain the heritage values of the place in its setting. Every conservation decision should be based on an understanding of its likely impact on the significance of the fabric and other aspects of the place concerned.

- 25 Our definition of conservation includes the objective of sustaining heritage values. In managing significant places, 'to preserve', even accepting its established legal definition of 'to do no harm', is only one aspect of what is needed to sustain heritage values. The concept of conservation area designation, with its requirement 'to preserve or enhance', also recognises the potential for beneficial change to significant places, to reveal and reinforce value. 'To sustain' embraces both preservation and enhancement to the extent that the values of a place allow. Considered change offers the potential to enhance and add value to places, as well as generating the need to protect their established heritage values. It is the means by which each generation aspires to enrich the historic environment.

Relationship to other policy documents

- 26 Planning Policy Statement 1 *Delivering Sustainable Development* (2005) includes the explicit objective of 'protecting and enhancing the natural and historic environment'.¹ In these *Principles, Policies and Guidance*, we provide detailed guidance on sustaining the historic environment within the framework of established government policy. In particular, the document distils from Planning Policy Guidance note (PPG) 15 *Planning and the Historic Environment* (1994) and PPG16 *Archaeology and Planning* (1990) those general principles which are applicable to the historic environment as a whole. It also provides a structure within which other current English Heritage policy and guidance should be applied. The *Policies and Guidance* will be updated to refer to and reflect new heritage legislation and government policy as they emerge, and in the light of experience in use.
- 27 At the international level,² the *Principles* reflect many of the presumptions of the *World Heritage Convention*, with its call to give all natural and cultural heritage a function in the life of communities. The *Principles* are consistent with the *Granada Convention* on the protection of the architectural heritage, and the *Valletta Convention* on the protection of the archaeological heritage, both ratified by the United Kingdom. The *European Landscape Convention*, also ratified by the United Kingdom, has been influential, not least for its definition of a landscape as 'an area, as perceived by people...', and its references to the need to consider sustaining cultural values in managing all landscapes, as well as the importance of public engagement in that process.

¹ See paragraphs 5, 17-18

² *Convention concerning the Protection of the World Cultural and Natural Heritage* (UNESCO, 1972)
Convention for the Protection of the Architectural Heritage of Europe (Granada: Council of Europe, 1985, ETS 121)
European convention on the Protection of the Archaeological Heritage (Valletta: Council of Europe, 1992, ETS 143)
European Landscape Convention (Florence: Council of Europe, 2000, ETS 176)

Correlation with current and proposed legislation

- 28** The White Paper *Heritage Protection for the 21st Century* (March 2007) proposed a single national *Register of historic buildings and sites of special architectural, historic or archaeological interest*, which will include all those places currently on the statutory list of buildings of special architectural or historic interest and the schedule of monuments, the non-statutory registers of historic parks and gardens and of battlefields, and World Heritage Sites (although the latter are designated internationally). 'Historic asset' is the proposed shorthand for registered places, although marine 'historic assets' will remain outside this system. Conservation areas will continue to be designated at local level, alongside non-statutory local designations, and much of the archaeological resource will continue to be managed by policy, rather than designation.
- 29** In the proposed new national system of cultural heritage protection, 'reasons for designation' will set out why each 'historic asset' is above the threshold for designation for its 'architectural, historic or archaeological interest'. Grounds for designation will necessarily be confined to specific values under these headings, directly related to published selection criteria. The statutory basis of designation will, however, be sufficiently broad to embrace the range of values which the *Principles* identify as desirable to take into account in the management of significant places.

Equalities impact assessment

Public bodies are legally required to ensure that their plans, policies and activities do not unfairly discriminate against a group protected by equalities legislation. It is the responsibility of those public bodies for whom we provide advice to ensure that that they have conducted any relevant Equalities Impact Assessment that may be required when implementing the advice of English Heritage.

CONSERVATION PRINCIPLES

I The historic environment is a shared resource

- I.1 Our environment contains a unique and dynamic record of human activity. It has been shaped by people responding to the surroundings they inherit, and embodies the aspirations, skills and investment of successive generations.
- I.2 People value this historic environment as part of their cultural and natural heritage. It reflects the knowledge, beliefs and traditions of diverse communities. It gives distinctiveness, meaning and quality to the places in which we live, providing a sense of continuity and a source of identity. It is a social and economic asset and a resource for learning and enjoyment.
- I.3 Each generation should therefore shape and sustain the historic environment in ways that allow people to use, enjoy and benefit from it, without compromising the ability of future generations to do the same.
- I.4 Heritage values represent a public interest in places, regardless of ownership. The use of law, public policy and public investment is justified to protect that public interest.
- I.5 Advice and assistance should be available from public sources to help owners sustain the heritage in their stewardship.

2 Everyone should be able to participate in sustaining the historic environment

- 2.1** Everyone should have the opportunity to contribute his or her knowledge of the value of places, and to participate in decisions about their future, by means that are accessible, inclusive and informed.
- 2.2** Learning is central to sustaining the historic environment. It raises people's awareness and understanding of their heritage, including the varied ways in which its values are perceived by different generations and communities. It encourages informed and active participation in caring for the historic environment.
- 2.3** Experts should use their knowledge and skills to encourage and enable others to learn about, value and care for the historic environment. They play a crucial role in discerning, communicating and sustaining the established values of places, and in helping people to refine and articulate the values they attach to places.
- 2.4** It is essential to develop, maintain and pass on the specialist knowledge and skills necessary to sustain the historic environment.

3 Understanding the significance of places is vital

- 3.1** Any fixed part of the historic environment with a distinctive identity perceived by people can be considered a place.
- 3.2** The significance of a place embraces all the diverse cultural and natural heritage values that people associate with it, or which prompt them to respond to it. These values tend to grow in strength and complexity over time, as understanding deepens and people's perceptions of a place evolve.
- 3.3** In order to identify the significance of a place, it is necessary first to understand its fabric, and how and why it has changed over time; and then to consider:
- who values the place, and why they do so
 - how those values relate to its fabric
 - their relative importance
 - whether associated objects contribute to them
 - the contribution made by the setting and context of the place
 - how the place compares with others sharing similar values.
- 3.4** Understanding and articulating the values and significance of a place is necessary to inform decisions about its future. The degree of significance determines what, if any, protection, including statutory designation, is appropriate under law and policy.

4 Significant places should be managed to sustain their values

- 4.1 Change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people's responses to social, economic and technological change.
- 4.2 Conservation is the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.
- 4.3 Conservation is achieved by all concerned with a significant place sharing an understanding of its significance, and using that understanding to:
- judge how its heritage values are vulnerable to change
 - take the actions and impose the constraints necessary to sustain, reveal and reinforce those values
 - mediate between conservation options, if action to sustain one heritage value could conflict with action to sustain another
 - ensure that the place retains its authenticity – those attributes and elements which most truthfully reflect and embody the heritage values attached to it.
- 4.4 Action taken to counter harmful effects of natural change, or to minimise the risk of disaster, should be timely, proportionate to the severity and likelihood of identified consequences, and sustainable.
- 4.5 Intervention may be justified if it increases understanding of the past, reveals or reinforces particular heritage values of a place, or is necessary to sustain those values for present and future generations, so long as any resulting harm is decisively outweighed by the benefits.
- 4.6 New work should aspire to a quality of design and execution which may be valued both now and in the future. This neither implies nor precludes working in traditional or new ways, but should respect the significance of a place in its setting.

5 Decisions about change must be reasonable, transparent and consistent

- 5.1** Decisions about change in the historic environment demand the application of expertise, experience and judgement, in a consistent, transparent process guided by public policy.
- 5.2** The range and depth of understanding, assessment and public engagement should be sufficient to inform and justify the decision to be made, but efficient in the use of resources. Proportionality should govern the exercise of statutory controls.
- 5.3** Potential conflict between sustaining heritage values of a place and other important public interests should be minimised by seeking the least harmful means of accommodating those interests.
- 5.4** 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.

6 Documenting and learning from decisions is essential

- 6.1** Accessible records of the justification for decisions and the actions that follow them are crucial to maintaining a cumulative account of what has happened to a significant place, and understanding how and why its significance may have been altered.
- 6.2** Managers of significant places should monitor and regularly evaluate the effects of change and responses to it, and use the results to inform future decisions. Public bodies similarly should monitor and respond to the effects on the historic environment of their policies and programmes.
- 6.3** If all or part of a significant place will be lost, whether as a result of decision or inevitable natural process, its potential to yield information about the past should be realised. This requires investigation and analysis, followed by archiving and dissemination of the results, all at a level that reflects its significance.
- 6.4** Where such loss is the direct result of human intervention, the costs of this work should be borne by those who benefit from the change, or whose role it is to initiate such change in the public interest.

UNDERSTANDING HERITAGE VALUES

Preamble

- 30 People may value a place for many reasons beyond utility or personal association: for its distinctive architecture or landscape, the story it can tell about its past, its connection with notable people or events, its landform, flora and fauna, because they find it beautiful or inspiring, or for its role as a focus of a community. These are examples of cultural and natural heritage values in the historic environment that people want to enjoy and sustain for the benefit of present and future generations, at every level from the ‘familiar and cherished local scene’³ to the nationally or internationally significant place.
- 31 Many heritage values are recognised by the statutory designation and regulation of significant places, where a particular value, such as ‘architectural or historic interest’ or ‘scientific interest’, is judged to be ‘special’, that is above a defined threshold of importance. Designation necessarily requires the assessment of the importance of specific heritage values of a place; but decisions about its day-to-day management should take account of *all* the values that contribute to its significance. Moreover, the significance of a place should influence decisions about its future, whether or not it is has statutory designation.
- 32 Although most places of heritage value are used, or are capable of being used, for some practical purpose, the relationship between their utility and their heritage values can range from mutual support (in the normal situation of use justifying appropriate maintenance) to conflict. Places with heritage values can generate wider social and economic (‘instrumental’) benefits, for example as a learning or recreational resource, or as a generator of tourism or inward economic investment, although their potential to do so is affected by external factors, such as ease of access. Utility and market values, and instrumental benefits, are different from heritage values in nature and effect.
- 33 This section is intended to prompt comprehensive thought about the range of inter-related heritage values that may be attached to a place. The high level values range from evidential, which is dependent on the inherited fabric of the place, through historical and aesthetic, to communal values which derive from people’s identification with the place.
- 34 Some values can be appreciated simply as a spontaneous, although culturally influenced, response; but people’s experience of all heritage values tends to be enhanced by specific knowledge about the place.

³ PPG 15, *Planning and the historic environment* (1994), para 1.1.

Evidential value

- 35 Evidential value derives from the potential of a place to yield evidence about past human activity.
- 36 Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These remains are part of a record of the past that begins with traces of early humans and continues to be created and destroyed. Their evidential value is proportionate to their potential to contribute to people's understanding of the past.
- 37 In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past. Age is therefore a strong indicator of relative evidential value, but is not paramount, since the material record is the primary source of evidence about poorly-documented aspects of any period. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it.
- 38 Evidential value derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.

Historical value

- 39 Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be *illustrative* or *associative*.
- 40 The idea of *illustrating* aspects of history or prehistory – the perception of a place as a link between past and present people – is different from purely evidential value. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. An historic building that is one of many similar examples may provide little unique evidence about the past, although each illustrates the intentions of its creators equally well. However, their distribution, like that of planned landscapes, may be of considerable evidential value, as well as demonstrating, for instance, the distinctiveness of regions and aspects of their social organisation.

- 41 Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have 'technological value'.
- 42 *Association* with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or cultural affiliations. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote, or are recorded as having said, at the time, and so also provide evidential value.
- 43 Many buildings and landscapes are associated with the development of other aspects of cultural heritage, such as literature, art, music or film. Recognition of such associative values tends in turn to inform people's responses to these places. Associative value also attaches to places closely connected with the work of people who have made important discoveries or advances in thought about the natural world.
- 44 The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.

- 45 The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so, cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them. Conversely, abandonment, as of, for example, a medieval village site, may illustrate important historical events.⁴

Aesthetic value

- 46 Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.
- 47 Aesthetic values can be the result of the conscious *design* of a place, including artistic endeavour. Equally, they can be the seemingly *fortuitous* outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects – for example, where the qualities of an already attractive landscape have been reinforced by artifice – while others may inspire awe or fear. Aesthetic values tend to be specific to a time and cultural context, but appreciation of them is not culturally exclusive.
- 48 *Design value* relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.
- 49 Sustaining design value tends to depend on appropriate stewardship to maintain the integrity of a designed concept, be it landscape, architecture, or structure.
- 50 It can be useful to draw a distinction between design created through detailed instructions (such as architectural drawings) and the direct creation of a work of art by a designer who is also in significant part the craftsman. The value of the artwork is proportionate to the extent that it remains the actual product of the artist's hand. While the difference between design and 'artistic' value can be clear-cut, for example statues on pedestals (artistic value) in a formal garden (design value), it is often far less so, as with repetitive ornament on a medieval building,

⁴ For guidance on the restoration on ruins see para 133, on alterations to sustain use, para 154.

- 51 Some aesthetic values are not substantially the product of formal design, but develop more or less *fortuitously* over time, as the result of a succession of responses within a particular cultural framework. They include, for example, the seemingly organic form of an urban or rural landscape; the relationship of vernacular buildings and structures and their materials to their setting; or a harmonious, expressive or dramatic quality in the juxtaposition of vernacular or industrial buildings and spaces. Design in accordance with Picturesque theory is best considered a design value.
- 52 Aesthetic value resulting from the action of nature on human works, particularly the enhancement of the appearance of a place by the passage of time ('the patina of age'), may overlie the values of a conscious design. It may simply add to the range and depth of values, the significance, of the whole; but on occasion may be in conflict with some of them, for example, when physical damage is caused by vegetation charmingly rooting in masonry.
- 53 While aesthetic values may be related to the age of a place, they may also (apart from artistic value) be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.

Communal value

- 54 Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.
- 55 *Commemorative* and *symbolic* values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. The most obvious examples are war and other memorials raised by community effort, which consciously evoke past lives and events, but some buildings and places, such as the Palace of Westminster, can symbolise wider values. Such values tend to change over time, and are not always affirmative. Some places may be important for reminding us of uncomfortable events, attitudes or periods in England's history. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be understood through information and interpretation, whereas, in others, the character of the place itself tells most of the story.

- 56 *Social value* is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that has generated a deeper attachment, or shaped some aspect of community behaviour or attitudes. Social value can also be expressed on a large scale, with great time-depth, through regional and national identity.
- 57 The social values of places are not always clearly recognised by those who share them, and may only be articulated when the future of a place is threatened. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may indeed have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it.
- 58 Compared with other heritage values, social values tend to be less dependent on the survival of historic fabric. They may survive the replacement of the original physical structure, so long as its key social and cultural characteristics are maintained; and can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, although this is rare in England.
- 59 Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.
- 60 Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

Preamble

- 61 Understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment. This section sets out such a process, which can be applied not only to places already acknowledged as significant, but also to those where the potential for change generates the need for assessment. Not all stages will be applicable to all places.

Understand the fabric and evolution of the place

- 62 To identify the cultural and natural heritage values of a place, its history, fabric and character must first be understood. This should include its origins, how and why it has changed over time (and will continue to change if undisturbed), the form and condition of its constituent elements and materials, the technology of its construction, any habitats it provides, and comparison with similar places. Its history of ownership may be relevant, not only to its heritage values, but also to its current state.
- 63 The study of material remains alone will rarely provide sufficient understanding of a place. The information gained will need to be set in the context of knowledge of the social and cultural circumstances that produced the place. Documentation underpinning any existing statutory designations is also important. Historical and archaeological archives always help with understanding how and why the place has changed over time, as may personal recollections, which can be fundamental to identifying some historical and communal values. Published research frameworks may highlight particular aspects of evidential value or potential, but absence of evidence is not evidence of absence, especially of concealed or buried remains.
- 64 Historic Environment Records play a vital role in developing a comprehensive and dynamic information resource, both for understanding particular places and as a wider research tool. Key elements of documentation generated through understanding places, and making changes to significant places, should be copied to Historic Environment Records, as well as remaining accessible to everyone directly concerned with the place.

- 65 Extensive mapping, description, understanding and assessment – ‘characterisation’ – can facilitate rapid analysis of large areas, both urban and rural. Its aim is to help people recognise how the past has shaped the present landscape, by identifying the distinctive historic elements of an area, and explaining past contexts of particular places within it.⁵

Identify who values the place, and why they do so

- 66 To provide a sound basis for management, the people and communities who are likely to attach heritage values to a place should be identified, and the range of those values understood and articulated, not just those that may be a focus of contention. This involves engaging with owners, communities and specialists with a sufficient range of knowledge of the place, subject to the need for proportionality.
- 67 Different people and communities may attach different weight to the same heritage values of a place at the same time. Experience shows that judgements about heritage values, especially those relating to the recent past, tend to grow in strength and complexity over time, as people’s perceptions of a place evolve. It is therefore necessary to consider whether a place might be so valued in the future that it should be protected now.
- 68 Understanding the history of a place does not necessarily make it significant; but the process of investigation often generates and helps to define perceptions of heritage value. This may happen through physical or documentary discoveries, or dialogue; but equally may be prompted by the articulation of links between the qualities of a particular place and the evolution of the culture that produced it, or the events that happened there.

⁵ See *Boundless Horizons: Historic Landscape Characterisation* and *Using Historic Landscape Characterisation* (English Heritage, 2004) and at a more detailed level, *Guidance on conservation area appraisals* (English Heritage, 2006).

Relate identified heritage values to the fabric of the place

- 69** An assessment of significance will normally need to identify how particular parts of a place and different periods in its evolution contribute to, or detract from, each identified strand of cultural and natural heritage value. This is current practice in statutory designation, in relation to those particular values that are the basis of selection. The most useful categories for differentiating between the components of a place ('what') are temporal ('when', often linked to 'by whom') and spatial ('where', 'which part', often linked to 'why'). Understanding a place should produce a chronological sequence of varying precision, allowing its surviving elements to be ascribed to 'phases' in its evolution. Some phases are likely to be of greater significance than others, while some values, such as historical or communal, will apply to the place as a whole. For example:

'The evidential value and potential of Smith's Hall lies primarily in the timber-framed elements of the medieval hall house and 16th century cross-wing, and to a moderate extent in the 18th century alterations and partial casing. The latter is, however, of high architectural value, marred by superficial 19th century accretions, but complemented by a study extension of c1970 by A Architect. The contemporary garden is an outstanding design, integrating framework, sculpture and planting. The building well illustrates a regionally typical pattern of development from a medieval core, and its historical value is enhanced by its association with the writer A Wordsmith who commissioned the study and garden. Since his death Smith's Hall has developed as a creative writing centre and the focus of an annual literary festival'.⁶

- 70** In other cases, differentiation will be spatial, for example:

'The street block of the factory was designed by A N Other to demonstrate the architectural potential of the company's terracotta; it is a bold and well-proportioned design which was followed by others in the district. Its architectural value is reinforced by the technological [*ie illustrative historical*] value of the fireproof construction of the floors using hollow pots. The rear block, although it followed soon afterwards, is by contrast architecturally entirely typical of its date and place. While of lesser architectural value, it and the other buildings on the site, each of which fulfilled a specific role in the manufacturing process, are collectively of high evidential and historical value.'

- 71** In many cases, differentiation will be a combination of the spatial and the temporal. It will normally best be illustrated by maps or plans showing the age and relative significance of the components or character areas of a place. Where the assessment is prompted by potential change, it is important that elements that would be directly affected are addressed at an appropriate level of detail, but always in relation to the place as a whole.

⁶ As a result of which it may also acquire social value over time.

Consider the relative importance of those identified values

- 72** It is normally desirable to sustain all the identified heritage values of a place, both cultural and natural; but on occasion, what is necessary to sustain some values will conflict with what is necessary to sustain others (paragraphs 91-92). If so, understanding the relative contribution of each identified heritage value to the overall value of the place – its significance – will be essential to objective decision-making. A balanced view is best arrived at through enabling all interested parties to appreciate their differing perspectives and priorities.
- 73** As the 'Smith's Hall' example above demonstrates, some elements of a place may actually mar or conceal its significance. Identifying these is current good practice in statutory designation, both national and local, the latter through conservation area character appraisals. Eliminating or mitigating negative characteristics may help to reveal or reinforce heritage values of a place and thus its significance.

Consider the contribution of associated objects and collections

- 74** Historically-associated objects can make a major contribution to the significance of a place, and association with the place can add heritage value to those objects. The range includes, but is not limited to, artefacts recovered through archaeological fieldwork, artworks and furnishings, collections, tools and machinery, and related archives, both historical and archaeological. The value of the whole is usually more than the sum of the parts, so that permanent separation devalues both place and objects. The contribution of such objects and archives, including evolving collections, should be articulated, even if they are currently held elsewhere, and regardless of whether their contribution falls within the scope of statutory protection.
- 75** Where places have been created around accumulated collections (for example, museums or libraries), the interior of a room or part of a garden has been designed as an entity (including a specific collection of furniture or sculpture, as well as fixed elements), or where an industrial building was designed around or to accommodate particular machinery, the relationship between the objects or elements and the place is fundamental to the significance of the place.

Consider the contribution made by setting and context

- 76** 'Setting' is an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape. Definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance.
- 77** 'Context' embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places.

Compare the place with other places sharing similar values

- 78** Understanding the importance of a place by comparing it with other places that demonstrate similar values normally involves considering:
- how strongly are the identified heritage values demonstrated or represented by the place, compared with those other places?
 - how do its values relate to statutory designation criteria, and any existing statutory designations of the place?
- 79** Designation at an international, national or local level is an indicator of the importance of particular value(s) of a place; but the absence of statutory designation does not necessarily imply lack of significance. Detailed research and analysis may reveal new evidence about any place, and designation criteria are reviewed from time to time. The heritage values of a place established through detailed study should therefore normally be compared with current selection criteria for designation or the application of protective policies.

- 80** Value-based judgements about elements of the historic environment have implications both for places and for everyone with an interest in them. Such judgements provide the basis for decisions about whether, or to what extent, a place should be conserved, rather than remade or replaced. Designation forms the basis of the statutory system of heritage protection. It may have important financial and other consequences for owners, while the refusal to designate may mean the loss of a place to which some people attached considerable significance. Consistency of judgement is therefore crucial to the public acceptability and fairness of the process. Detailed criteria for statutory designation, periodically updated,⁷ and a methodical articulation of how a particular place does or does not meet such criteria, make a major contribution to achieving that consistency.
- 81** The fact that a place does not meet current criteria for formal designation does not negate the values it may have to particular communities. Such values should be taken into account in making decisions about its future through the spatial planning system,⁸ or incentive schemes like Environmental Stewardship.

Articulate the significance of the place

- 82** A 'statement of significance' of a place should be a summary of the cultural and natural heritage values currently attached to it and how they inter-relate, which distils the particular character of the place. It should explain the relative importance of the heritage values of the place (where appropriate, by reference to criteria for statutory designation), how they relate to its physical fabric, the extent of any uncertainty about its values (particularly in relation to potential for hidden or buried elements), and identify any tensions between potentially conflicting values. So far as possible, it should be agreed by all who have an interest in the place. The result should guide all decisions about material change to a significant place.
- 83** Assessments in support of a decision that a place passes the threshold for statutory designation for a particular value normally stand the test of time. However, the values of a place tend to extend beyond those which justify designation, and to grow in strength and complexity as time passes (Principle 3.3). A statement of significance is an informed and inclusive judgement made on a particular set of data, applying prevailing perceptions of value, primarily to inform the management of a significant place. The statement will therefore need review in the light of new information, and periodically to reflect evolving perceptions of value (Principle 3.4).

⁷ Communities and Local Government Circular 01/2007, *Revision to principles of selection for listing buildings* complemented by detailed *Selection Guides* for particular building types produced by English Heritage, are a major step towards achieving this objective for listed buildings.

⁸ In line with the *European Landscape Convention*, Articles 5, 6.

MANAGING CHANGE
TO SIGNIFICANT
PLACES

Preamble

- 84** Conservation involves people managing change to a significant place in its setting, in ways that sustain, reveal or reinforce its cultural and natural heritage values (Principle 4.2). Conservation is not limited to physical intervention, for it includes such activities as the interpretation and sustainable use of places. It may simply involve maintaining the *status quo*, intervening only as necessary to counter the effects of growth and decay, but equally may be achieved through major interventions; it can be active as well as reactive. Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effect on heritage values. It is only harmful if (and to the extent that) significance is eroded.
- 85** The public interest in significant places is recognised through specific legislative and policy constraints on their owners, but there are few fiscal concessions to encourage conservation, and direct financial assistance is very limited. It is the potential of significant places to be used and enjoyed that generates value in the market or to a community, and so tends to motivate and enable their owners to exercise positive, informed stewardship. Very few significant places can be maintained at either public or private expense unless they are capable of some beneficial use; nor would it be desirable, even if it were practical, for most places that people value to become solely memorials of the past.
- 86** Keeping a significant place in use is likely to require continual adaptation and change; but, provided such interventions respect the values of the place, they will tend to benefit public (heritage) as well as private interests in it. Many places now valued as part of the historic environment exist because of past patronage and private investment, and the work of successive generations often contributes to their significance. Owners and managers of significant places should not be discouraged from adding further layers of potential future interest and value, provided that recognised heritage values are not eroded or compromised in the process.
- 87** The shared public and private interest in sustaining significant places in use demands mutual co-operation and respect between owners or managers and regulators. The best use for a significant place – its 'optimum viable use'⁹ – is one that is both capable of sustaining the place and avoids or minimises harm to its values in its setting. It is not necessarily the most profitable use if that would entail greater harm than other viable uses.

⁹ PPG 15, paragraph 3.9, in the context of listed buildings, but the principle is applicable to most significant places.

- 88 Decisions about change to significant places may be influenced by a range of interests. They may involve balancing the heritage value(s) of what exists now against the predicted benefits and disbenefits of the proposed intervention; that is to say, the public interest in the historic environment (which, if statutorily protected, is subject to a policy presumption in favour of preservation), with other, usually inter-related, public and private interests. There is rarely a single right answer, so adequate information and adopting a consistent, rigorous process are crucial to reaching publicly-justifiable decisions.

Establish whether there is sufficient information

- 89 Understanding the impacts or consequences of proposed change should go beyond implications that are immediately apparent; for example, how much physical intervention would really be required to implement a proposal or a change of use? Specific investigation is often required, not only of ongoing processes of growth, change and decay, and other factors which may make the significance of the place vulnerable to harm or loss, but also of technical information about all the implications of a potential change, and often of the methods by which it would be achieved.
- 90 Having understood the scope of continuing or proposed change, sufficient information about the values of the elements of the place that would be affected is essential. The general process of assessing values and significance is addressed above (paragraphs 61-65). But detailed, targeted investigation and evaluation may be required, particularly of habitats, and of potential buried archaeological deposits or concealed structure, in order adequately to establish the contribution they make to the significance of the place. If required as part of a statutory process, such research must, however, be directly and proportionately related to the nature of proposal and its potential effects.

Consider the effects on authenticity and integrity

- 91** Evidential value, historical values and some aesthetic values, especially artistic ones, are dependent upon a place retaining (to varying degrees) the actual fabric that has been handed down from the past; but authenticity lies in whatever most truthfully reflects and embodies the values attached to the place (Principle 4.3). It can therefore relate to, for example, design or function, as well as fabric. Design values, particularly those associated with landscapes or buildings, may be harmed by losses resulting from disaster or physical decay, or through ill-considered alteration or accretion. Design value may be recoverable through repair or restoration, but perhaps at the expense of some evidential value. Keeping a large machine, like a water mill or boat lift, in use, may require replacement and modification of structural or moving parts which could be retained if it ceased to operate, producing a tension between authenticity of fabric and function.
- 92** The decision as to which value should prevail if all cannot be fully sustained always requires a comprehensive understanding of the range and relative importance of the heritage values involved (guided by the assessment of significance: paragraphs 82-83), and what is necessary (and possible) to sustain each of them. Retaining the authenticity of a place is not always achieved by retaining as much of the existing fabric as is technically possible.
- 93** A desire to retain authenticity tends to suggest that any deliberate change to a significant place should be distinguishable, that is, its extent should be discernible through inspection. The degree of distinction that is appropriate must take account of the aesthetic values of the place. In repair and restoration, a subtle difference between new and existing, comparable to that often adopted in the presentation of damaged paintings, is more likely to retain the coherence of the whole than jarring contrast.
- 94** Integrity (literally, 'wholeness, honesty') can apply, for example, to a structural system, a design concept, the way materials or plants are used, the character of a place, artistic creation, or functionality. Decisions about recovering any aspect of integrity that has been compromised must, like authenticity, depend upon a comprehensive understanding of the values of the place, particularly the values of what might be lost in the process.
- 95** Every place is unique in its combination of heritage values, so, while it is technically possible to relocate some structures, their significance tends to be diminished by separation from their historic location. There are exceptions, for example public sculpture not significantly associated with its current site, or moving a structure back from an eroding cliff edge, thus recovering its intended relationship with the landform. Relocated structures may also acquire new values in a new location.

Take account of sustainability

- 96** Significant places should be used and managed in ways that will, wherever possible, ensure that their significance can be appreciated by generations to come, an established aspect of stewardship. Sustaining the value of the historic environment as a whole depends also on creating in the present the heritage of the future, through changes that enhance and enrich the values of places. Both objectives involve the difficult task of anticipating the heritage values of future generations, as well as understanding those of our own.
- 97** Sustaining heritage values is likely to contribute to environmental sustainability, not least because much of the historic environment was designed for a comparatively low-energy economy. Many historic settlements and neighbourhoods, tending towards high density and mixed use, provide a model of sustainable development. Traditional landscape management patterns have been sustained over centuries. Many traditional buildings and building materials are durable, and perform well in terms of the energy needed to make and use them. Their removal and replacement would require a major reinvestment of energy and resources.
- 98** The re-use of sound materials derived from the place being repaired or altered is traditional practice and contributes to the sustainable use of energy and material resources. Mixing old and new materials in exposed situations, however, may be inadvisable. Maintaining demand for new traditional and local materials will also stimulate their continued or renewed production, and help to ensure a sustainable supply and the craft skills to utilise it.
- 99** The re-use of sound traditional materials recovered from alteration and demolition elsewhere can also contribute to sustainability, provided they are not derived from degrading other significant places primarily because of the value of their materials.

Consider the potential reversibility of changes

- 100** In reality, our ability to judge the long-term impact of changes on the significance of a place is limited. Interventions may not perform as expected. As perceptions of significance evolve, future generations may not consider their effect on heritage values positive. It is therefore desirable that changes, for example those to improve energy efficiency in historic buildings, are capable of being reversed, in order not unduly to prejudice options for the future.

- I01** However, places should not be rendered incapable of a sustainable use simply because of a reluctance to make modest, but irreversible, changes. It is also unreasonable to take the idea of reversibility to the point that intervention in significant places diminishes their aesthetic values by appearing contrived, awkward or ugly, in order to ensure that it can be undone. Unless of very short duration, crude and intrusive changes are certainly not justifiable simply because they are theoretically temporary or reversible, for they risk becoming permanent.

Compare options and make the decision

- I02** Ideally, proposed changes will cause no harm to any of the values of the place, and the right decision will be obvious. In practice, however, there tend to be options for achieving the objective of proposed change, each of which will have different impacts on values. The predicted long-term or permanent consequences of proposals (in terms of degree, and whether positive, negative or neutral) on each of the identified heritage values of a place, and thus on the significance of the whole, should provide the reasoned basis for a decision, where necessary taking other interests into account.
- I03** Where there are options for the conservation management of change, or reconciling conservation and other interests, 'heritage impact assessment' can be used to compare the predicted effects of alternative courses of action (including taking no action) on the values of a place, in order to identify the optimum solution. The approach can be refined by weighting different values to reflect their relative importance for the place and its significance. Heritage impact assessment can be particularly useful if applied at the conceptual stage of a proposal, and refined at each successive step towards making a decision.

Apply mitigation

- I04** If some negative impact or loss of fabric is unavoidable, mitigation should be considered to minimise harm. This will normally include making records and archiving parts of significant elements, including archaeological deposits, that will be removed or altered prior to and during the work, in accordance with Principles 6.3 and 6.4. A high quality of design of proposed interventions is not mitigation; it is essential in any significant place (Principle 4.6), regardless of any unavoidable harm. Mitigation should not be confused with compensation – non-essential benefits to other aspects of the place, or to other heritage interests.

Monitor and evaluate outcomes

- I05** Monitoring implementation helps to ensure that outcomes reflect expectations. If, despite prior investigation, the unexpected is revealed during implementation, proposals should, so far as is reasonably possible, be amended to minimise harm.
- I06** The management of significant places should include regular monitoring and evaluation of the effects of change, in accordance with Principles 6.1 and 6.2. This provides the basis for action to address ongoing change (including action by authorities to mitigate the effects of deliberate neglect). Outcomes of decisions can be compared with expectations, often revealing unanticipated consequences, and informing future policy and decisions.
- I07** Conservation management plans, regularly reviewed, can provide a sound framework for the management of significant places, particularly those in responsible long-term ownership.

ENGLISH HERITAGE
CONSERVATION
POLICIES AND
GUIDANCE

Preamble

- 108** This section summarises the policies that will guide English Heritage in offering advice or making decisions about particular types of change affecting significant places. More than one type of change may of course be included in any particular proposal. English Heritage is primarily concerned with the effect of proposals on the heritage values of places, and its policies are framed accordingly.
- 109** While some of the policies have a close relationship to particular principles (for example 'New work and alteration' to Principle 4.6), it is important that all the policies are interpreted in the framework of the *Principles* as a whole.
- 110** Tension between conservation and other public policies usually arises from a perceived need to harm the heritage values of a place in order to achieve another important public policy objective, or to sustain the place itself (paragraph 150). The converse is 'enabling development' contrary to public policy, which is proposed in order to sustain a significant place (paragraph 158). In both cases, it is important to keep a sense of proportion, and not automatically to assume that cultural or natural heritage values must prevail over all other public interests. Such tensions are usually best reconciled by integrating conservation with the other public interests through dialogue, based on mutual understanding and respect.

Routine management and maintenance

- 111** **The conservation of significant places is founded on appropriate routine management and maintenance.**
- 112** The values of landscapes and buildings tend to be quickly obscured or lost if long-standing management and maintenance regimes are discontinued. Such regimes are often closely linked to historic design, function and stewardship, and dependent on traditional processes and materials. Since most habitats in England are the result of long-established land management practices, sustaining their ecosystems can depend upon continuing those practices. Reinstating a lapsed regime can help to recover both cultural and natural heritage values.
- 113** Regular monitoring should inform continual improvement of planned maintenance and identify the need for periodic repair or renewal at an early stage. If a permanent solution to identified problems is not immediately possible, temporary works should be undertaken to prevent the problems from escalating. Temporary solutions should be effective, timely and reversible.

Periodic renewal

- I 14** Periodic renewal of elements of a significant place, intended or inherent in the design, is normally desirable unless any harm caused to heritage values would not be recovered over time.
- I 15** Periodic renewal, such as re-covering roofs, differs from maintenance in that it occurs on a longer cycle, is usually more drastic in nature and often has a greater visual impact. It involves the temporary loss of certain heritage values, such as the aesthetic value of the patina of age on an old roof covering, or the value of a dying tree as a habitat for invertebrates; but these values are likely to return within the next cycle, provided the replacement is physically and visually compatible (normally 'like for like', to the extent that this is sustainable). By contrast, the consequence of not undertaking periodic renewal is normally more extensive loss of both fabric and heritage values.
- I 16** The justification required for periodic renewal will normally be that the fabric concerned is becoming incapable of fulfilling its intended functions through more limited intervention; and additionally, in the case of landscapes, that succession planting cannot achieve the objective in a less drastic way. Harm to values that will normally be recovered during the next cycle can, in most cases, be discounted, but potential permanent harm cannot be ignored in making the decision.

Repair

- I 17** Repair necessary to sustain the heritage values of a significant place is normally desirable if:
- a. there is sufficient information comprehensively to understand the impacts of the proposals on the significance of the place; and
 - b. the long term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future; and
 - c. the proposals are designed to avoid or minimise harm, if actions necessary to sustain particular heritage values tend to conflict.
- I 18** It is important to look beyond the immediate need for action, to understand the reasons for the need for repair and plan for the long-term consequences of inevitable change and decay. While sufficient work should be undertaken to achieve a lasting repair, the extent of the repair should normally be limited to what is reasonably necessary to make failing elements sound and capable of continuing to fulfil their intended functions.

- I19** The use of materials or techniques with a lifespan that is predictable from past performance, and which are close matches for those being repaired or replaced, tends to carry a low risk of future harm or premature failure. By contrast, the longer term effects of using materials or techniques that are innovative and relatively untested are much less certain. Not all historic building materials or techniques were durable – iron cramps in masonry, or un-galvanised steel windows, for example, are both subject to corrosion. Some structural failures are the inevitable, if slowly developing, consequences of the original method of construction. Once failure occurs, stabilising the structure depends on addressing the underlying causes of the problem, not perpetuating inherent faults.
- I20** The use of original materials and techniques for repair can sometimes destroy more of the original fabric, and any decoration it carries, than the introduction of reinforcing or superficially protective modern materials. These may offer the optimum conservation solution if they allow more significant original fabric to be retained. In historic landscapes, planting may need to utilise alternative species, to resist disease or the effects of climate change. Before making decisions, it is essential to understand all the heritage values of the elements concerned, and to consider the longer term, as well as the immediate, conservation objectives.
- I21** Sometimes, the action necessary to sustain or reinforce one heritage value can be incompatible with the actions necessary to sustain others. Understanding the range, inter-relationships and relative importance of the heritage values associated with a place should establish priorities for reconciling or balancing such tensions. While every reasonable effort should be made to avoid or minimise potential conflict, contrived solutions requiring intensive maintenance are likely to be difficult to sustain.

Intervention to increase knowledge of the past

- I22** Intervention in significant places primarily to increase knowledge of the past, involving material loss of evidential values, should normally be acceptable if:
- a. preservation *in situ* is not reasonably practicable; or
 - b. it is demonstrated that the potential increase in knowledge
 - cannot be achieved using non-destructive techniques; and
 - is unlikely to be achieved at another place whose destruction is inevitable; and
 - is predicted decisively to outweigh the loss of the primary resource.

If acceptable, an intervention demands:

- c. a skilled team, with the resources to implement a project design based on explicit research objectives;
 - d. funded arrangements for the subsequent conservation and public deposit of the site archive, and for appropriate analysis and dissemination of the results within a set timetable;
 - e. a strategy to ensure that other elements and values of the place are not prejudiced by the work, whether at the time or subsequently, including conservation of any elements left exposed.
- I23** The historic environment provides a unique record of past human activity, but differs from written archives in that 'reading' some parts of it can only be achieved through the destruction of the primary record. This policy applies particularly to the excavation of buried archaeological deposits, but can be relevant to the physical investigation of structures. It concerns intervention that goes beyond the evaluation and targeted investigation that may be necessary to inform and justify conservation management decisions.
- I24** The continuing development of investigative techniques suggests that, in future, it will be possible to extract more data from excavation and intervention than is currently possible, just as now it is usual to extract much more information than was possible a few decades ago. This demands a cautious approach to the use of a finite resource, and seeking to avoid loss of integrity, but it cannot reasonably exclude all research at a significant place. It must be recognised that much of the evidential value of the primary archive – the place itself – lies in its potential to increase knowledge of the past, to help protect the place and other similar places by a better understanding of their significance, to stimulate research, to encourage the further development of techniques to extract data, and to train successive generations of archaeologists.

- I25** Intervention must be justified primarily by considering the potential gain in knowledge in relation to the impact on the archaeological resource, and specifically on the place or type of site in question. Established, relevant research framework priorities should be taken into account. Intervention should always be the minimum necessary to achieve the research objectives, fully utilising the potential of non-destructive techniques; but also extensive enough to ensure that the full research potential of what is necessarily to be destroyed in the process can be realised.

Restoration

- I26** Restoration to a significant place should normally be acceptable if:
- a. the heritage values of the elements that would be restored decisively outweigh the values of those that would be lost;
 - b. the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence;
 - c. the form in which the place currently exists is not the result of an historically-significant event;
 - d. the work proposed respects previous forms of the place;
 - e. the maintenance implications of the proposed restoration are considered to be sustainable.
- I27** Restoration is intervention made with the deliberate intention of revealing or recovering a known element of heritage value that has been eroded, obscured or previously removed, rather than simply maintaining the *status quo*. It may also achieve other conservation benefits, for example restoring a roof on a roofless building may make it both physically and economically sustainable in the long term. Restoration of some elements of a place may be a desirable precursor to the introduction of new work (paragraph I38), which will necessarily take over where the evidence for restoration ends.
- I28** The concept of authenticity (paragraph 91) demands that proposals for restoration always require particularly careful justification. Reinstating damaged elements of work directly created by the hand of an artist normally runs counter to the idea of authenticity and integrity. However, the reinstatement of damaged architectural or landscape features in accordance with an historic design evidenced by the fabric of a place may not do so, if the design itself was the artistic creation, intended to be constructed by others, and the necessary materials and skills are available.
- I29** Mitigation through recording (paragraph I04) is particularly important in restoration work. The results should be integrated with and used to update the initial analysis of the evidence for restoration (which will often be expanded and modified in detail during the early stages of work), and the result deposited in the appropriate Historic Environment Record.

‘The heritage values of the elements that would be restored decisively outweigh the values of those that would be lost.’

- I30** Any restoration inevitably removes or obscures part of the record of past change to a significant place, and so reduces its evidential value, as well as potentially affecting its historical and aesthetic values. Restoration may, however, bring gains by revealing other heritage values, such as the integrity and quality of an earlier and more important phase in the evolution of a place, which makes a particular contribution to its significance. Careful assessment of the values of the elements affected is essential. Where the significance of a place is the result of centuries of change, restoration to some earlier stage in its evolution is most unlikely to meet this criterion.

‘The nature of the work proposed is justified by compelling evidence of the evolution of the place, and is executed in accordance with that evidence’.

- I31** Evidence of the evolution of the place, and particularly of the phase to which restoration is proposed, should be drawn from all available sources – from study of the fabric of the place itself (the primary record of its evolution), any documentation of the original design and construction process, and subsequent archival sources, including records of previous interventions. The results of this research and the reasoned conclusions drawn from it should be clearly set out.
- I32** Speculative or generalised re-creation should not be presented as an authentic part of a place: the criteria for new work should apply to its design. But judgement is needed in determining the level of information specific to the place required to justify restoration. For example, reinstatement of an historic garden requires compelling evidence of its planned layout and hard materials, usually based upon or verified by archaeological investigation, and the structure of its planting; but it would be neither essential nor possible to replicate the precise location of every plant once within the garden.

‘The form in which the place currently exists is not the result of an historically-significant event’.

- I33** If a building or structure was ruined or its character fundamentally changed as a consequence of an important historical event, its subsequent state will contribute to its significance: castles slighted in the Civil War, or monastic houses unroofed at the Dissolution, provide examples. In the wake of such episodes, some places were ruined, some cleared away completely, and others repaired and adapted for new purposes. Attempts to restore those exceptional places that have survived as ruins would deny their strong visual and emotional evidence of important historic events. Ruins – real or contrived – can also play a major role in designed landscapes, define the character of places, or be celebrated in art. Even so, their restoration or adaptive re-use may be justified if the alternative is loss.

- I34** The response to dramatic contemporary events which may ultimately come to be seen as historically significant – to memorialise, rebuild or redevelop – tends to be driven by public debate. If the place involved was not previously considered significant, such debate may be regarded solely as part of the event. Physical sustainability and changing values will, however, tend to influence the medium- to long-term future of memorialised ruins of comparatively modern buildings, or the scars of conflict.
- I35** By contrast, neglect and decay, abandonment, including the removal of roofs, crude adaptation for transient uses, accidental fires and similar circumstances are not normally historically-significant events, and subsequent restoration of the damaged parts of the place, even after a long interval, will not fail this test. Retaining gutted shells as monuments is not likely, in most cases, to be an effective means of conserving surviving fabric, especially internal fabric never intended to withstand weathering; nor is this approach likely to be economically sustainable. In such cases, it is appropriate to restore to the extent that the evidence allows, and thereafter to apply the policy for new work (paragraph I38).
- I36** **‘The work proposed respects previous forms of the place’**
The more radical the restoration, the more likely it is to introduce an element of incongruity. The reversal of relatively minor but harmful changes, to restore a place to a form in which it recently existed as a complete entity, is unlikely to contradict this criterion. By contrast, the restoration of isolated parts of a place to an earlier form, except as legible elements of an otherwise new design, would produce an apparently historic entity that had never previously existed, which would lack integrity.
- I37** **‘The maintenance implications of the proposed restoration are considered to be sustainable’**
It is essential to consider the long term implications of a proposed restoration for viability and sustainability. If, for instance, a place or part of it was modified primarily in order to reduce maintenance costs, restoration without considering the increased resources needed for maintenance is likely to be counter-productive. The reinstatement of elaborate parterres in historic gardens is an obvious example, but others can have more serious consequences. For example, reversing a ‘crown flat’ – a flat roof inserted between ridges to eliminate a valley gutter in an historic roof – will lead to rapid decay if the restored valley gutter is not readily accessible and adequately maintained.

New work and alteration

- I38** New work or alteration to a significant place should normally be acceptable if:
- there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;
 - the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;
 - the proposals aspire to a quality of design and execution which may be valued now and in the future;
 - the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future.
- I39** The recognition of the public interest in heritage values is not in conflict with innovation, which can help to create the heritage of the future. Innovation is essential to sustaining cultural values in the historic environment for present and future generations, but should not be achieved at the expense of places of established value.
- ‘The proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed’**
- I40** The greater the range and strength of heritage values attached to a place, the less opportunity there may be for change, but few places are so sensitive that they, or their settings, present no opportunities for change. Places whose significance stems essentially from the coherent expression of their particular cultural heritage values can be harmed by interventions of a radically different nature.
- I41** Quality of design, materials, detailing and execution is obviously essential in places of established value. Conversely, places of lesser significance offer the greatest opportunity for the creation of the heritage values of tomorrow, because they have the greatest need of quality in what is added to them. Their potential will only be achieved if all new work aspires to the quality routinely expected in more sensitive places.
- ‘The proposals aspire to a quality of design and execution which may be valued now and in the future’**
- I42** The need for quality in new work applies at every level, from small interventions in an historic room, to major new buildings or developments. Small changes need as much consideration as large ones, for cumulatively their effect can be comparable.

- I43 There are no simple rules for achieving quality of design in new work, although a clear and coherent relationship of all the parts to the whole, as well as to the setting into which the new work is introduced, is essential. This neither implies nor precludes working in traditional or new ways, but will normally involve respecting the values established through an assessment of the significance of the place.
- I44 Quality is enduring, even though taste and fashion may change. The eye appreciates the aesthetic qualities of a place such as its scale, composition, silhouette, and proportions, and tells us whether the intervention fits comfortably in its context. Achieving quality always depends on the skill of the designer. The choice of appropriate materials, and the craftsmanship applied to their use, is particularly crucial to both durability and to maintaining the specific character of places.
- ‘The long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future’**
- I45 New work frequently involves some intervention in the existing fabric of a place, which can be necessary to keep it in or bring it back into use. A ‘presumption in favour of preservation’ (doing no harm), even preservation of evidential value, does not equate to a presumption against any intervention into, or removal of, existing fabric; but such interventions require justification in terms of impacts on heritage values.
- I46 There are limits, however; beyond which loss of inherited fabric compromises the authenticity and integrity of a place. At the extreme, a proposal to retain no more than the façade of an historic building attached to a modern structure must be considered in the light of an assessment of the existing values of the building, both as a whole and in its elements. The relationship between the façade and the existing and proposed structures behind will be crucial to the decision, but retaining the façade alone will not normally be acceptable.
- I47 Changes designed to lessen the risk or consequences of disaster to a significant place require a balance to be struck between the possibility of major harm to heritage values without them, and the certainty of the lesser, but often material, harm caused by the works themselves. The need for physical precautions should be considered as part of disaster response and recovery planning for the place as a whole, based on risk assessment and management requirements, and any statutory duties. All options should be evaluated, including improved management as an alternative to, or in conjunction with, lower levels of physical intervention.

- 148** As with repair, the use in interventions of materials and techniques proven by experience to be compatible with existing fabric, including recycled material from an appropriate source (paragraphs 98-99), tends to bring a low risk of failure. Work which touches existing fabric lightly, or stands apart from it, brings progressively greater opportunity for innovation. Energy efficiency (in production as well as use), sustainable sourcing of materials, and environmental good practice should guide all new work, but not to the extent of causing harm to the heritage values of the place.

Integrating conservation with other public interests

- 149** Changes which would harm the heritage values of a significant place should be unacceptable unless:
- the changes are demonstrably necessary either to make the place sustainable, or to meet an overriding public policy objective or need;
 - there is no reasonably practicable alternative means of doing so without harm;
 - that harm has been reduced to the minimum consistent with achieving the objective;
 - it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place, considering
 - its comparative significance,
 - the impact on that significance, and
 - the benefits to the place itself and/or the wider community or society as a whole.
- 150** The integration of heritage and other environmental interests with economic and social objectives at every level of strategic planning – national, regional, local – helps to minimise conflict. A willingness to consider and compare the impacts on the significance of a place of a range of options to achieve the public objective concerned is essential, as is selecting an option that either eliminates, or (as far as is possible) mitigates harm. This will often involve those representing heritage interests in employing the skills necessary critically to appraise the case and options for development, as well as its promoters employing the skills needed to evaluate heritage implications. The heritage case should be put fully and robustly.
- ‘Comparative significance’**
- 151** The greater the significance of a place to society, the greater the weight that should be attached to sustaining its heritage values. This concept of ‘proportionality’ (Principle 5.4) relies on judgement rather than formulae, but is fundamental to equitable reconciliation of the public interest in heritage with other public and private interests.

- I52** Since statutory designation, at local as well as national level, is a clear indicator of the significance of a place, the fact of designation can itself play a vital role in guiding options for strategic change. The absence of designation, however, does not necessarily mean that a place is of low significance (paragraphs 79, 81). The weight to be attached to heritage values relative to other public interests should not be considered until those heritage values have been properly evaluated, assessed against current criteria and, if they meet them, safeguarded by designation.
- ‘Impact on significance’**
- I53** The assessment of the degree of harm to the significance of a place should consider the place as a whole and in its parts, its setting, and the likely consequences of doing nothing. In the case of a derelict historic building, for example, should a viable, but modestly damaging, proposal be refused in the hope that a better or less damaging scheme will come forward before the place reaches the point of no return? In such circumstances, the known or predicted rate of deterioration is a crucial factor, and hope must be founded on rational analysis. The potential availability of subsidy as an alternative to harmful change, or to limit its impact, should be considered. The fact that a place is neglected should not, of itself, be grounds for agreeing a scheme that would otherwise be unacceptable.
- ‘Benefits to the place’**
- I54** Quite minor changes, for example to meet the duties to make ‘reasonable adjustments’ under the Disability Discrimination Act 1995, or accommodate changing liturgy in a church, may keep a place fit for use. This in turn can make a place sustainable by maintaining its market value, or allowing its continued use by a community. Any changes that would cause harm to the heritage values of the place should obviously be limited to what is necessary to sustain it in use, and their impacts mitigated so far as possible. However, a high quality of design of proposed interventions is not mitigation, but essential in any significant place (Principle 4.6), and offers of compensation should not make harmful proposals more acceptable (paragraph 104).
- ‘Benefits to the wider community or society as a whole’**
- I55** These assessments are broader and more complex than those concerned only with the gains and losses for the heritage values of a place. The underlying considerations should always be proportionality and reasonableness: whether, in relation to the place or society, the predicted benefits of change outweigh the residual, unavoidable harm that would be done to the significance of the place. The balance lies between retaining significance – the sum of the heritage values ascribed at the point of change to something which, if lost, cannot be replaced – and the predicted, and potentially short-term, benefits of development. The benefits, including those of strategies to mitigate and adapt to climate change, need to be subject to scrutiny in proportion to their impact on heritage values.

156 Reconciling conservation and other public objectives can be most difficult when the heritage values of a significant place, often an archaeological site or an historic building, must be compared with the potential of a replacement to enhance the place because of its allegedly greater cultural value. Subjective claims about the architectural merits of replacements cannot justify the demolition of statutorily-protected buildings.¹⁰ There are less clear-cut situations, however, in which it is proposed to replace a building or develop a place of modest, but positive, heritage value with one that is claimed to be of much greater architectural quality, or where such a proposal would affect the setting of a significant place. Its supporters claim net enhancement, while its opponents claim absolute harm to the heritage values of the place. Each is making a value-based judgement, but choosing to attach different weights to particular values. If such positions are maintained, the choice is ultimately a political one, or for decision at public inquiry.

Enabling development

157 Enabling development that would secure the future of a significant place, but contravene other planning policy objectives, should be unacceptable unless:

- a. it will not materially harm the heritage values of the place or its setting
- b. it avoids detrimental fragmentation of management of the place;
- c. it will secure the long term future of the place and, where applicable, its continued use for a sympathetic purpose;
- d. it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid;
- e. sufficient subsidy is not available from any other source;
- f. it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests;
- g. the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.

158 Enabling development is development that would deliver substantial benefit to a place, but which would be contrary to other objectives of national, regional or local planning policy. It is an established planning principle that such development may be appropriate if the public benefit of rescuing, enhancing, or even endowing a significant place decisively outweighs the harm to other material interests. Enabling development must always be in proportion to the public benefit it offers.

¹⁰ This is currently stated as government policy in PPG 15, *Planning and the historic environment* (1994) at paragraph 3.19 (iii).

- 159** If it is decided that a scheme of enabling development meets all the criteria set out above, planning permission should be granted only if:
- a. the impact of the development is precisely defined at the outset, normally through the granting of full, rather than outline, planning permission;
 - b. the achievement of the heritage objective is securely and enforceably linked to the enabling development, bearing in mind the guidance in ODPM Circular 05/05, *Planning obligations*;
 - c. the place concerned is repaired to an agreed standard, or the funds to do so made available, as early as possible in the course of the enabling development, ideally at the outset and certainly before completion or occupation; and
 - d. the planning authority closely monitors implementation, if necessary acting promptly to ensure that obligations are fulfilled.

CONCLUSION

Applying the *Principles*

- 160** These *Conservation Principles, Policies and Guidance* build on earlier statements and experience, to formalise an approach which takes account of a wide range of heritage values. They are intended to help everyone involved to take account of the diverse ways in which people value the historic environment as part of their cultural and natural heritage. They acknowledge that the cultural and natural heritage values of places, including those reflected in landscape designations, should be managed in parallel, fostering close working relationships between cultural and natural heritage interests.
- 161** Balanced and justifiable decisions about change in the historic environment depend upon understanding who values a place and why they do so, leading to a clear statement of its significance and, with it, the ability to understand the impact of the proposed change on that significance.
- 162** Every reasonable effort should be made to eliminate or minimise adverse impacts on significant places. Ultimately, however, it may be necessary to balance the public benefit of the proposed change against the harm to the place. If so, the weight given to heritage values should be proportionate to the significance of the place and the impact of the change upon it.
- 163** The historic environment is constantly changing, but each significant part of it represents a finite resource. If it is not sustained, not only are its heritage values eroded or lost, but so is its potential to give distinctiveness, meaning and quality to the places in which people live, and provide people with a sense of continuity and a source of identity. The historic environment is a social and economic asset and a cultural resource for learning and enjoyment.
- 164** Although developed primarily to guide the activities of English Heritage staff, we therefore commend these *Principles, Policies and Guidance* for adoption and application by all involved with the historic environment and in making decisions about its future.

DEFINITIONS

This section includes words used in a specific or technical sense. The *Oxford English Dictionary* definition otherwise applies.

Alteration

Work intended to change the function or appearance of a place

Authenticity

Those characteristics that most truthfully reflect and embody the cultural heritage values of a place¹¹

Conservation

The process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations

Conservation area

'An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance', designated under what is now s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990

Context

Any relationship between a place and other places, relevant to the values of that place

Designation

The recognition of particular heritage value(s) of a significant place by giving it formal status under law or policy intended to sustain those values

Fabric

The material substance of which places are formed, including geology, archaeological deposits, structures and buildings, and flora

Harm

Change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a place

Heritage

All inherited resources which people value for reasons beyond mere utility

Heritage, cultural

Inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others

Heritage, natural

Inherited habitats, species, ecosystems, geology and landforms, including those in and under water, to which people attach value

Historic environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible or buried, and deliberately planted or managed flora

Historic Environment Record

A public, map-based data set, primarily intended to inform the management of the historic environment

Integrity

Wholeness, honesty

Intervention

Any action which has a physical effect on the fabric of a place

Maintenance

Routine work regularly necessary to keep the fabric of a place in good order

Material

Relevant to and having a substantial effect on, demanding consideration

Natural change

Change which takes place in the historic environment without human intervention, which may require specific management responses (particularly maintenance or periodic renewal) in order to sustain the significance of a place

¹¹ This definition is based on *The Nara Document on Authenticity* (ICOMOS 1994)

Object

Anything not (now) fixed to or incorporated within the structure of a place, but historically associated with it

Place

Any part of the historic environment, of any scale, that has a distinctive identity perceived by people

Preserve

To keep safe from harm¹²

Proportionality

The quality of being appropriately related to something else in size, degree, or other measurable characteristics

Public

Of, concerning, done, acting, etc. for people as a whole

Renewal

Comprehensive dismantling and replacement of an element of a place, in the case of structures normally reincorporating sound units

Repair

Work beyond the scope of maintenance, to remedy defects caused by decay, damage or use, including minor adaptation to achieve a sustainable outcome, but not involving restoration or alteration

Restoration

To return a place to a known earlier state, on the basis of compelling evidence, without conjecture

Reversible

Capable of being reversed so that the previous state is restored

Transparent

Open to public scrutiny

Setting

The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape

Significance [of a place]

The sum of the cultural and natural heritage values of a place, often set out in a statement of significance

Significant place

A place which has heritage value(s)

Sustain

Maintain, nurture and affirm validity

Sustainable

Capable of meeting present needs without compromising ability to meet future needs

Value

An aspect of worth or importance, here attached by people to qualities of places

Value, aesthetic

Value deriving from the ways in which people draw sensory and intellectual stimulation from a place

Value, communal

Value deriving from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory

Value, evidential

Value deriving from the potential of a place to yield evidence about past human activity

Value, historical

Value deriving from the ways in which past people, events and aspects of life can be connected through a place to the present

Value-based judgement

An assessment that reflects the values of the person or group making the assessment

¹² The legal interpretation established in *South Lakeland DC v Secretary of State for the Environment and Rowbotham* [1991] 2 L.P.R. 97

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Timeline of the Local Listing of LL8 Entrance Building, part of Scottish and Southern Energy (sse), 55 Vastern Road, Reading RG1 8BU

April/May 2017 officers aware of the building and given the proposed disposal by sse, officers ask the Local Studies Library for assistance in finding out about the history of the building.

22 May 2017 Following an assessment under the Council's selection criteria, the original main entrance building at 55 Vastern Road was added to the Local List on 22 May 2017

26 May 2017 notification letter sent to the owner's planning agent advising them of the local listing.

6 July 2017 an objection to the local listing was received on behalf of the owner, which included a heritage review report. This appeal against the listing was in time and in accordance with the agreed Local Listing process which states (*"The owner (and occupier) will have a six week period to notify the local planning authority of any reason why they believe the building or structure should not have been locally listed. Any revision to the decision to locally list a building or structure will be carried out by the Head of Planning and Building Control in consultation with the Lead Councillor for Regeneration, Planning and Transport."*)

13 July 2017 the objection was reviewed by the Council's (then) conservation consultant and it was concluded that, *"..the building is still considered to be 'substantially complete', actually most of it is there. The reasoning accepts that secondary criteria are achieved on one or more elements"*. The recommendation was that the appeal/objection should not be accepted.

18 September 2017 and in accordance with the adopted procedure in place at that time, the Head of Planning and Building Control in consultation with the Lead Member for Strategic Planning and Transport, were briefed on the objection received. The recommendation was that building should remain locally listed and no adjustment to the listing of the wording was required.

2 October 2017 it was agreed by the Head of SEPT that the local listing should remain.

14 November 2017 formal confirmation that the local listing would stand was provided to the owner's planning agent by letter.

Photos of the Locally Listed Building and local listing description

[Fig.1 Vastern Road, Reading. Local electric substation on right in the rear.](#)



[Fig.2 55 Vastern Road, Reading, detail of façade with red brick, ochre banding stone and Classical details.](#)



[Fig. 3 Interior of 55 Vastern Road.](#)



[Local listing on RBC website](#)

The local listing description is set out on the relevant section of the Council's website as follows:

LL8 – Entrance building, part of Scottish and Southern Energy (sse), 55 Vastern Road, Reading RG1 8BU

Date added to local list: 22 May 2017

Date of building looks to be around 1900, possibly 1903. Building is now integrated within the wider (architecturally later) office and industrial depot SSE complex on Vastern Road, but is clearly architecturally separately identifiable and distinct, Building thought to be connected to the electric works. In 1903 the electric tramways also opened in Reading (Reading Corporation Tramways) and although this appears to be unconnected to this building, there was clearly an electric revolution in the town at that time, and it could mean that this may be the last original part of the original electric works.

The street directory entry for Vastern Road in 1933 suggests that it might have been an individual building as a John Edwards is listed at 55 Vastern Road. The 1939 register lists him as the 'electric works superintendent', so there is the possibility that this was the caretaker's lodge to the electric works.

Main construction is orange brick in Flemish Bond with some grey/blue brick, which

is characteristic of Reading. Liberal use of stone suggests a higher quality building. 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, fashionable at the time.

There is use of stone in the string work, porticos, headers and pillars which gives this small building grandeur beyond its size.

The Local Studies Library has found an entry in Sidney Gold's book on local architects does say that the stores for the Reading Electric Co. on Vastern Road were built in 1903 or thereabouts, and the architect was Frederick William Albury (d.1912). Albury & Brown were a noted architectural practice in Reading

CRITERIA AND CONSIDERATION FOR LOCALLY LISTING BUILDINGS AND STRUCTURES IN READING BOROUGH

Background and explanation: Heritage assets cannot be replaced once lost. They include both nationally and locally listed buildings. Harm to an asset's significance can cause a loss of value to society and a loss of public benefit.

The criteria for assessment of locally listing buildings/ structures are set out below and are taken from the adopted Sites and Detailed Policies Document. These criteria and the accompanying explanation of how a particular building or structure meets these criteria will be used to assess whether that building or structure merits designation as a locally listed heritage asset.

The assessment will be based purely on the evidence provided with this form (unless the authority has access to further evidence).

Identification of buildings or structures for local listing: Buildings or structures worthy of being locally listed will mainly be identified through the process of considering and determining planning proposals and applications.¹

Exclusions

Buildings and structures will not be considered for the Local List when they are already part of a Conservation Area², Scheduled Monument, or subject to an article 4 direction relating to historical or architectural interest.

Address of building/ structure: Entrance building
Part of Scottish and Southern Energy (sse)
55 Vastern Road
Reading
Berkshire

Postcode: RG18BU

¹ Buildings or structures identified outside the application process will be considered as resources become available.

² Buildings that warrant local designation in a conservation area are awarded a 'Buildings of Townscape Merit' designation. For the purposes of the National Planning Policy Framework (NPPF, 2012), Buildings of Townscape Merit will be considered to warrant conservation and where appropriate enhancement in accordance with the NPPF.

Selection for the Local List

For any building, structure or group of buildings to be included in the Local List it **must** clearly meet the relevant age and integrity criteria:

	Please tick relevant box ³
(a) pre-1840: Any building, structure or group of buildings where its/ their style, form and construction are easily identifiable.	
(b) 1840 - 1913: Any building, structure or group of buildings that is/are substantially complete and unaltered and of definite significance.	✓
(c) 1914 - 1939: Any building, structure or group of buildings that is/are substantially complete and unaltered and of a high level of significance.	
(d) post 1939: Any building, structure or group of buildings that is/are of exceptional significance and wholly complete and unaffected by inappropriate changes.	

Please provide comments/ further explanation of above:

Date of building looks to be around 1900, possibly 1903.

Building is now integrated within the wider (architecturally later) office and industrial depot SSE complex on Vastern Road, but is clearly architecturally separately identifiable and distinct, although the roof of the adjacent buildings appears to run across the roof of this building. This may mean that either the adjacent building was built at the same height, or perhaps this building was originally taller. On balance, it is recommended that it can be concluded that it is 'substantially complete' and of 'definite significance'.

In addition it must also be shown that it contributes to the character of an area and is valued by local people in accordance with at least one of the criteria detailed below under the headings of historic interest, architectural interest and townscape value.

Historic interest

Please tick the relevant box/es

(a) Historical Association i. The building or structure has a well authenticated historical association with a notable person(s) or event. <i>Not aware.</i>	X
---	----------

³ Note – if none of the above boxes are ticked, the building/ structure will not qualify for consideration as a locally listed building.

<p>ii. The building or structure has a prolonged and direct association with figures or events of local interest. <i>Not aware.</i></p>	<p>X</p>
<p>(b) Social Importance The building or structure has played an influential role in the development of an area or the life of one of Reading's communities. Such buildings/structures may include places of worship, schools, community buildings, places of employment, public houses and memorials which formed a focal point or played a key social role.</p> <p><i>Unclear. Building thought to be connected to the electric works.</i></p> <p><i>The date of the building is 1903. In 1903 the electric tramways also opened in Reading (Reading Corporation Tramways) and although this appears to be unconnected to this building, there was clearly an electric revolution in the town at that time.</i></p>	<p>?</p>
<p>(c) Industrial Importance The building or structure clearly relates to traditional or historic industrial processes or important businesses or the products of such industrial processes or businesses in the history of Reading or are intact industrial structures, for example bridges.</p> <p><i>Yes, this is possible but precise extent and connections are not known. See below.</i></p>	<p>✓</p>

Comments/ further explanation of this should be provided in the box at the end of this section.

Historical importance

Little is known of the building, but the Berkshire Local Studies Library has conducted some initial desktop research based on old maps.

Comparing the images with the historical maps, it looks as though this building was to the left of the Iron Works, but may not have been connected to them. The boundaries and the lines of the buildings running from road to river in relation to the 'iron foundry' and later the garage don't seem to be close enough to it to be connected.

Looking at all the maps except 1989, it would appear that the building is separate, but adjoined to the 'skating rink' (or whatever else it was), with a boundary line running to the road's edge as it does for the other properties. The archway in the picture looks as though it corresponds to the hatchmark on the three earlier maps, I believe indicating the entrance to the Electric Works behind it (particularly in the 1913 map). This could mean that this may be the last original part of the original electric works

The street directory entries for Vastern Road itself weren't hugely helpful, but the entry for 1933 suggests that it might have been an individual building as a John Edwards is listed at 55 Vastern Road. The 1939 register lists him as the 'electric works superintendent', so there is the possibility that this was the caretaker's lodge to the

electric works.

Local historian Sidney Gold thinks this building is a remnant of the old electric company and was a storeroom/office.

Architectural interest

<p>(a) Sense of place i. The building or structure is representative of a style that is characteristic of Reading.</p> <p><i>Main construction is orange brick in Flemish Bond with some grey/blue brick, which is characteristic of Reading. Liberal use of stone suggests a higher quality building.</i></p>	<p>✓</p>
<p>(b) Innovation and Virtuosity i. The building or structure has a noteworthy quality of workmanship and materials.</p> <p><i>According to the Council's Conservation 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, fashionable at the time.</i></p> <p><i>There is use of stone in the string work, porticos, headers and pillars which gives this small building a grandeur beyond its size.</i></p>	<p>✓</p>
<p>ii. The building or structure is the work of a notable local/national architect/engineer/builder.</p> <p><i>The Local Studies Library has found an entry in Sidney Gold's book on local architects does say that the stores for the Reading Electric Co. on Vastern Road were built in 1903 or thereabouts, and the architect was Frederick William Albury (d.1912).</i></p> <p>The building is by the practice of Albury & Brown, a noted architectural practice in Reading. FW Albury/A&B were also responsible for the following Reading buildings (and there may be more):</p> <ul style="list-style-type: none"> --Caversham Free Library on Church Street, Caversham (Listed Grade II). The Library is in a similar mix of styles as the sse building, with polychromatic detailing. The listing for this building says it is probably FW Albury, although Sidney Gold thinks the Architect is in fact William Gorge Hooper Lewton. -Battle Library (Listed Grade II) <p>The original Heelas store on Broad Street (the façade of which partially survives at first, second and third floors)</p> <ul style="list-style-type: none"> -Cross Keys Inn, Gun Street (now the Be At One bar) -Extension to the Great Western Hotel (now Malmaison), Station 	<p>✓</p>

<p>Road/Blagrove Street (Listed Grade II) -Jacksons Corner (1880) A&B and a further building adjacent -Corn Stores, Forbury Road Listed Grade II) -In Oxford, the Wilberforce Temperance Hotel, Queens Street</p> <p>Albury was clearly an important local architect of his time, he had links to Alfred Waterhouse and appears to use a style which often appears quite reminiscent of Waterhouse. He clearly mentored many other architects, listed in the Directory of British Architects 1834-1914. He looks to have been active in the Berkshire and Oxfordshire area. He also wrote about Reading Abbey.</p>	
<p>iii. The building or structure shows innovation in materials, technique, architectural style or engineering</p> <p>The building is clearly distinctive, although small-scale and has a distinctive architectural style, whilst using materials connected with Reading.</p>	✓
<p>(c) Group Value i. The buildings/structures form a group which as a whole has a unified architectural or historic value to the local area. <i>None.</i></p>	
<p>ii. The buildings/structures are an example of deliberate town planning from before 1947 <i>No.</i></p>	

Comments/ further explanation of this should be provided in the box at the end of this section.

Townscape Value

<p>The buildings/structures have prominence and a landmark quality that is fundamental to the sense of place of a particular locality.</p>	✓
--	---

Please provide comments/ further explanation of above:

Although not great in scale, the intricacy and largely intact frontal façade in the Neo-Gothic Style makes it a pleasing building of townscape merit.

Recommendation made by (name of Proposer) : Richard Eatough
Date :22 May 2017

General notes and any other relevant information on the building/ structure by Proposer ⁴ making recommendation for local listing including reasons for recommendation ⁵

Source of all information and details of any supporting document used to support the recommendation to locally list the building or structure ⁶ .	
Detail of evidence/ document (including photographs)	Source/ reference of information
Old maps, images archive, Reading Street Directory 1933	Reading Local Studies Library
Heelas' of Reading	Royal Berkshire History.com
Various entries for FW Albury and Brown & Albury Architects	Sidney Gold: Biographical Dictionary of Architects at Reading (1999)
Various entries for FW Albury and Brown & Albury Architects	Directory of British Architects 1834-1914
Sashwindow.com	The Architecture and History of Caversham, Reading (blog)
Sidney Gold, local architectural historian	Telephone conversation

Continue on separate sheet if necessary

⁴ The 'Proposer' is anticipated to normally be the Planning Case Officer given that the identification of most buildings or structures will currently be identified through the process of determining planning applications, however, the 'Proposer' could also be a member of the public or another organisation' group.

⁵ Failure to meet the requirements for a building or structure to be locally listed at a particular point in time does not rule out future re-consideration of that building or structure if significant new evidence is produced.

⁶ Any supporting documentation provided cannot be returned and will be kept on file as part of the supporting documentation should the building be locally listed. Please only send photocopies (subject to relevant copyright) should you wish to keep a copy of any documentation.

For official use only.

Recommendation **confirmed/ rejected** (circle as appropriate) by Conservation Officer:

Date: _____

Conservation Officer signature confirming recommendation: _____

Position: _____

Print name: _____

Reasons that the recommendation for locally listing the building/ structure have been confirmed/ rejected

--

Any additional comments regarding the building/ structure

--

Building/ structure identification

Grid reference: _____

UPRN: _____

Signature of Manager accepting recommendation: _____

Date: _____

Position: _____

Print name: _____

Subject building, possibly the former electrical superintendent's Lodge to the Electric Works, Vastern Road, Reading



Appendix 7

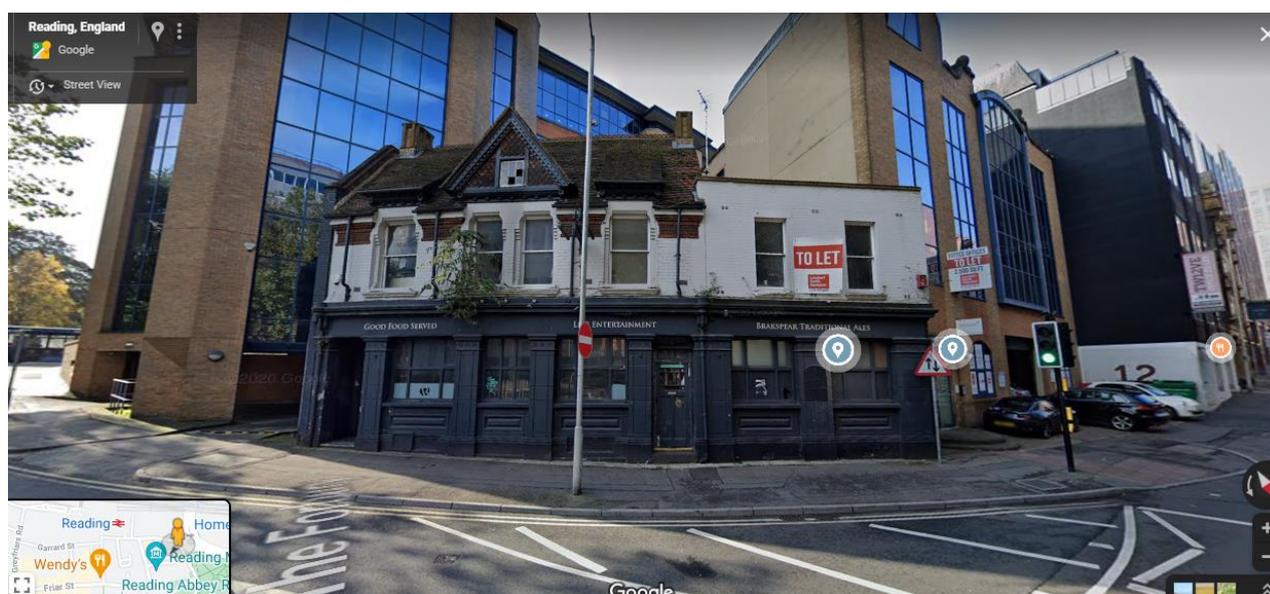
Example of a similar building to the subject building (indicating a similar characteristic architectural style of the time).

Commercial building in Friar Street, Reading (c.1905), using red brick and ochre stone banding with Classical details.



Example photos/details of other known Albury buildings in Reading (and two examples in Oxford)

1. Rising Sun Public House, 18 Forbury Road, Reading RG1 1SB (Locally Listed Building 7)



Date added to local list: 27 April 2017

Date of building is thought to be 1877 and may have originally been known as the Rising Sun Tavern. Extensions were probably added around 1900.

This is a typical Victorian pub design and there were at one time likely to have been many more in the down centre.

Some please architectural features and at first floor in particular, are decorative brick and tilework/ tile-hanging which is characteristic of Reading.

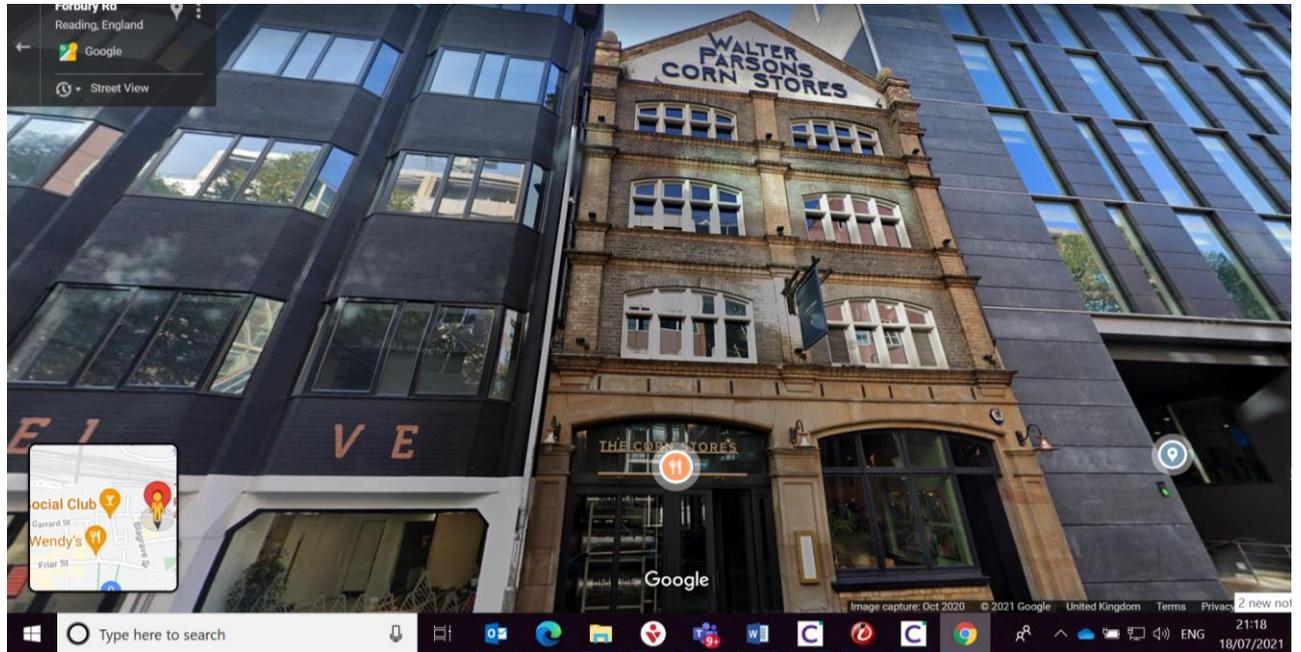
Exhibiting interesting brickwork detailing around the window reveals in the form of corbelled bricks and pilasters. The roof retains plain tiles, decorative ridge tiles, a central gabled dormer with decorative barge boards and two unusual raised roof sections over the flanking first floor windows. The gable end chimneys appear to have been truncated.

The ground floor appears to retain the historic architectural detailing in the form of stone or tile over brick forming pilasters between windows (windows replaced) with lower decorative panels. There is a later extension to the right.

The building is by the practice of Albury & Brown, a noted architectural practice in Reading, who are responsible for many Reading buildings including (the original Heelas store, Caversham Free Library, Battle Library). Albury was clearly an important local architect of his time; he had links to Alfred Waterhouse and appears to use a

style which often appears quite reminiscent of Waterhouse. He clearly mentored many other architects, listed in the Directory of British Architects 1834-1914.

2. The Corn Stores, 10 Forbury Road, RG1 1SB (Listed Grade II)



Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1248738

Date first listed: 05-Nov-1993

Statutory Address: WALTER PARSONS CORN STORES, 10, FORBURY ROAD

Details The following building shall be added to the list:-

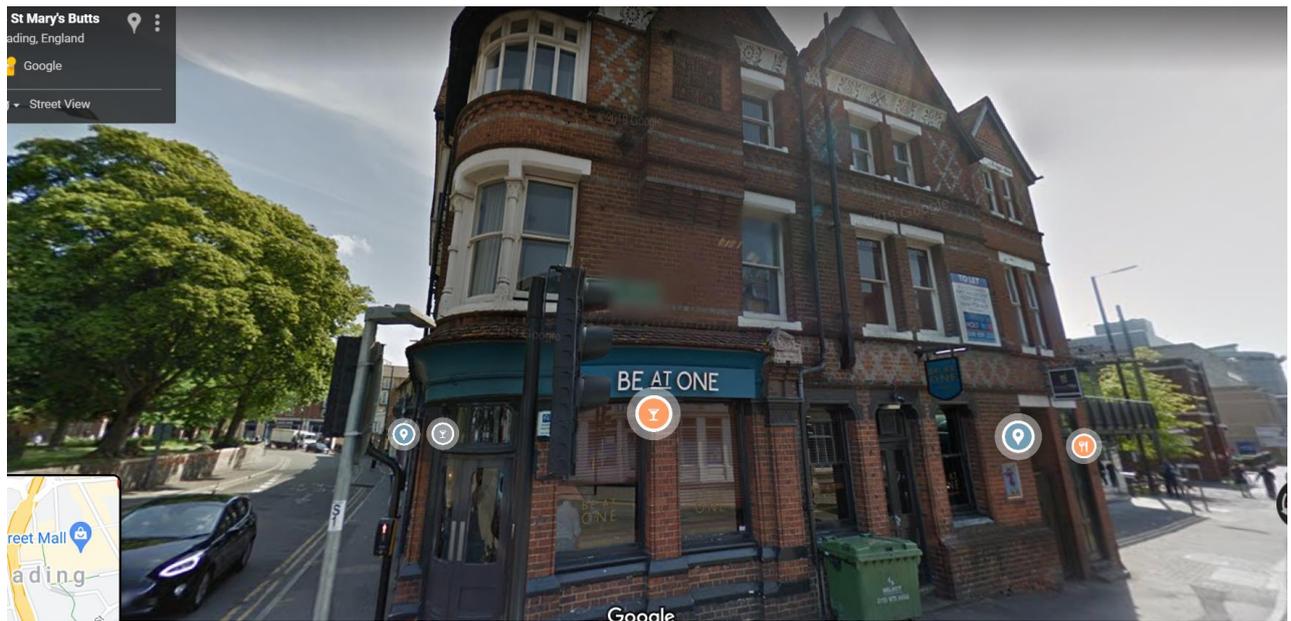
READING FORBURY ROAD SU 7173 NE (South side)

1/10002 No. 10 Walter Parsons Corn Stores - II Corn merchant's warehouse. Built in 1890 for Walter Parsons, corn merchants. Purple brick with yellow brick and ashlar dressings; slate roof with parapeted gable to front. PLAN: Rectangular plan with carriageway through left side and office on right with front entrance and loading bay behind; and with three storage floors above. EXTERIOR: 4 storey 2-bay gabled north front. The ashlar ground floor has panelled pilasters and segmental arches to office front on right, with panelled and glazed door and 3-light window with overlights above and carriageway on left with plank double doors. Storeys above with moulded brick stringcourses at floor and cill levels and the two bays divided by brick pilasters corbelled at top with ball finials flanking the gable [one ball missing]. Wide 4-light mullion-transom windows with segmental arches. Plain red brick rear elevation with sash windows. INTERIOR: The floors are supported on timber

joists with iron beams and iron columns. Collar truss roof with struts. The office has glazed and boarded screen to carriageway. Simple ladder stairs in corner to each floor. Hoist hatch over carriageway and through floors above. Machinery includes winch mechanism on first floor, threshing machine on second floor and hoppers on third floor.

Listing NGR: SU7167473704

3. Cross Keys Inn, 1 Gun Street, RG1 2JR (now the Be At One bar) (Building of Townscape Merit and landmark building within St Mary's Butts / Castle Street Conservation Area Appraisal 2008 - extract below)



6.4 Buildings of Townscape Merit

Most of the buildings in this Conservation area are listed as being of architectural or historic importance, both in their own right and for their group value. These are “Buildings of Townscape Merit” in their own right, particularly the churches and corner sites, but the unlisted former “Cross Keys” public house (now “Sahara”) on the corner of Gun Street and Bridge Street is also considered worthy as being a “Building of Townscape Merit”.



Former ‘Cross Keys’ public house

Buildings identified as having “townscape merit” will vary, but commonly they will be good examples of relatively unaltered 19th century and later buildings where their style, detailing and building materials provides the streetscape with interest and variety. Most importantly, they make a positive

contribution to the special interest of a conservation area. The former “Cross Keys” displays all of these attributes, not least in the use of decorative and patterned brickwork, as well as a particularly striking bay window at first floor level. “Cross Keys” motifs also appear throughout the building.

Buildings of Townscape Merit help create a conservation area’s distinctive and interesting historic townscape. As recommended in Planning Policy Guidance 15: Planning and the Historic Environment, the general presumption should be in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area.

4. West Branch Library (now Battle Library), 420 Oxford Road, RG30 1EE (Grade II) (attributed to Albury in Listing description)



Heritage Category: Listed Building

Grade: II

List Entry Number: 1302878

Date first listed: 14-Dec-1978

Statutory Address: West Branch Library, Oxford Road

Details SU 67 SE 16/543 Oxford Road (north side) West Branch Library II

1907 designed by F.W. Albury. A good example in "Wren-naissance" style. One 1/2 storeys. Red brick with Bath stone ashlar dressings, moulded plinth, modillion cornice and cope to parapet. Three bays each side or fabled porch break with paired glazing bar casement windows flanked by paired pilasters. Hipped tiled roof with two tripartite segmental dormers behind parapet. Wooden cupola with Doric peristyle and lead dome. Segmental headed entrance with concave surround. Gable over has three busts - Milton, Shakespeare and (possibly) Darwin.

Stone commemorative tablets on each side laid by Edward Jackson (mayor) and Dr Jameson Hurry (local antiquary) 16.x.1907. Lobby has marble commemorative plaques naming architect, donor Andrew Carnegie, G W Palmer (who opened it) and builders (T H Kingerlee and Sons).

Interior: top lit central hall with stained glass (The Abbey, Reading and University badges). Three rooms, side rooms have plaster barrel vault, and modillion cornice and dormers in ceiling. Glazed screen fronts desk to north room.

Listing NGR: SU6961873673

5. Caversham Free Public Library, Church Street, RG4 8AU (Grade II) (attributed to Albury in Listing description)



Heritage Category: Listed Building

Grade: II

List Entry Number: 1113456

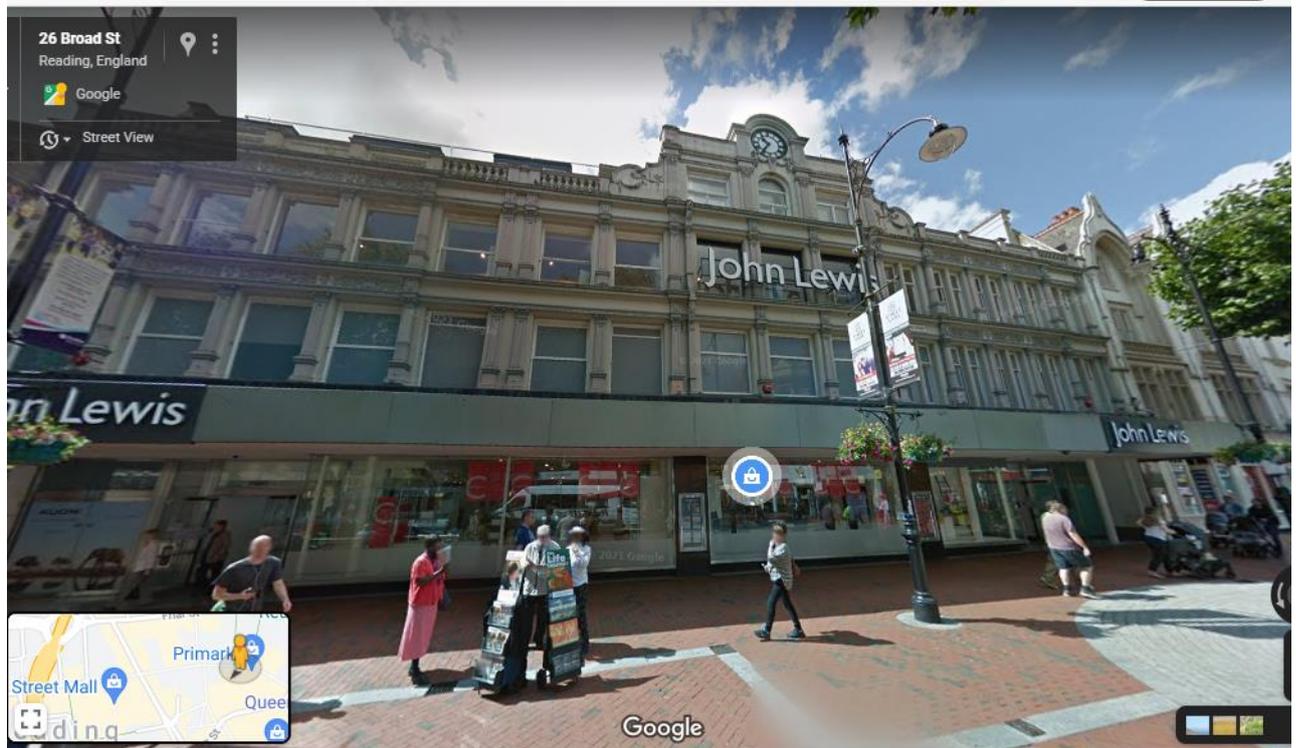
Date first listed: 14-Dec-1978

Statutory Address: CAVERSHAM FREE PUBLIC LIBRARY, CHURCH STREET

Details CHURCH STREET 1. 5128 Caversham Caversham Free Public Library SU 7174 11/455 II 2. Foundation stone laid 23.iiij 1907. Site given by Andrew Carnegie. Architect possibly F W Albury. Irregular red brick and stone sub-Voysey style with tiled roof. Asymmetrically disposed gables - one with inscription, other with date - flanking off centre tower which has pylon corner piers, and which is capped by ball finials and a small copper domed stair turret. Entrance in tower with large columns. Above is an Atlas figure (signed B L) supporting a clock. 3 windows in all, 3, 1 and 2 lights with dividing pilasters of alternate stone and brick and floral caps. Memorial tablet in marbled lobby. 3 window return to Hemdean Road. Interior altered.

Listing NGR: SU7134974812

6. The original Heelas store (now John Lewis), 108-113 Broad Street, RG1 2BB (the façade of which partially survives at first, second and third floors)



7. Jacksons Corner (1880) and a further building adjacent (east) (1-9 Kings Road), RG1 3AS (Buildings of Townscape Merit and landmark building within Market Place / London Street Conservation Area Appraisal 2008 - extract below)



Area 3: Duke Street, Jacksons Corner and the River Kennet:

This is the least homogenous of the four character areas but represents the transition from central core shopping area to other uses including hotel, casino and office use as one progresses towards London Street. The area can be divided into riverside development beside the Kennet and urban development around Jacksons Corner. From Yield Hall Place the area is dominated by the bulk of the Oracle Shopping Centre.

High Bridge, built over the Kennet in 1787, stands just upstream from a narrow modern bridge built approximately 200 years later. The close proximity of the two bridges typifies the close mix of old and new development that characterises this part of the area.

Jacksons Corner is a spacious cross-roads where curved late 19th century corner buildings such as 1-9 King's Road (Jacksons) and 2 Duke Street/25 King Street (Jacobs) have been designed to take account of their prominent location.

A modern shopping mall (Kings Walk) and modern development on the east side of the Duke Street/King's Road junction is out of character with the historic form and layout of the area.

Character Area 3: Features that make a positive contribution to the historic character and appearance of the conservation area:

- Jacksons Corner, a once busy crossroads and locally known landmark;
- Barclays Bank, King Street by Henry and Nathaniel Briant, 1838-9, in an ornate Italian palazzo style;
- The George Hotel, King Street, built around a courtyard with entrances from King Street and Minster Street, first mentioned in 1423 but built and re-built many times;
- 8 High Street, an ornate tiled and terracotta building in Art Nouveau style;
- The former Ship Hotel, Duke Street, an early 20th century re-building of an earlier coaching inn;
- River Kennet and riverside views from the two bridges;
- Views up High Street of St Laurence's church tower;
- Holy Brook, glimpsed from Kings Walk;
- Historic stone setted road surface in Thorn Lane;
- Riverside trees.

The Conservation Studio

8. London and County Bank (latterly the National Westminster Bank), 13-16 Market Place, RG1 2EG (Grade II)



Heritage Category: Listed Building

Grade: II

List Entry Number: 1113535

Date first listed: 26-Jul-1973

Statutory Address: NATIONAL WESTMINSTER BANK, 13-16, MARKET PLACE

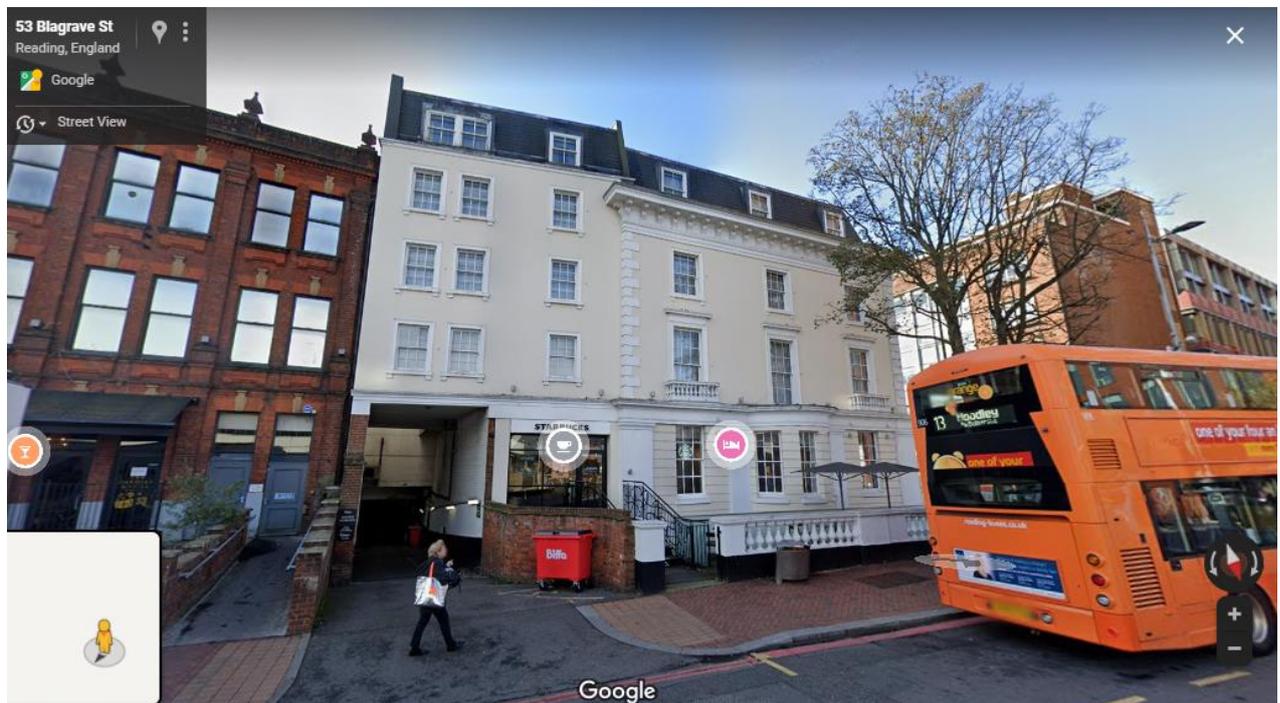
Details MARKET PLACE 1. 5128 (East Side) Yes 13 to 16 (consec) (National Westminster Bank) SU 7173 NE 1/333 SU 7173 SE 3/333 26.7.73. II GV 2. Mid C19. Renaissance palace style. 3 storeys. Bath stone ashlar with Portland balustraded parapet. 3 bays, the outer ones project slightly with corner piers. Astragal to moulded modillion cornice. Tripartite plate glass sash windows with enriched lintels and side pilasters with relief panel carvings supporting enriched entablature. 2nd floor centre bay has paired architrave windows. Modillion cornice over ground floor. Outer doorways with pink granite pilasters and round headed doors in rusticated concave jambs; similar surrounds to 2 central windows.

Listing NGR: SU7173473493

9. St. Saviour's Church, 5 Berkeley Avenue/Wolseley Street, RG1 6JT



10. Extension to the Great Western Hotel (now Malmaison), Station Road/Blagrove Street (Listed Grade II)



Heritage Category: Listed Building

Grade: II

List Entry Number: 1113591

Date first listed: 26-Jul-1973

Date of most recent amendment: 14-Dec-1978

Statutory Address: GREAT WESTERN HOUSE, STATION ROAD

Details

STATION ROAD 1. 5128 (East Side) Great Western House (Formerly listed as Former Great Western Hotel) SU 7173 NE 1/582 26.7.73. II 2. One of the 1st Railway Hotels in Britain. 1844 Italianate. 3 storeys and basement. Stucco with rusticated quoins. Ground floor channelled. 5x3 bays divided by pilasters supporting an entablature and boldly projecting modillion cornice. Glazing bar sash windows with architraves. Balustraded balcony, frieze and cornice to 1st floor windows, centre with pediment. 2nd floor windows with bracket cornice. Central projecting portico with full Doric order and paired columns. 2 bay canted extension to right in matching style. North front has central bowed 3 light bay with cornice over on ground floor. High panelled parapet over cornice. Later 4 storey extension to left with carriage entry. Moulded coping to parapet. 2+1 bays. Modern extension to south. Similarities with Royal Station Hotel at Slough suggest I K Brunel as architect or one of his assistants. Balustraded area to street with heavy balusters. Curved to station approach corner.

Listing NGR: SU7152473692

11. Another local example in Oxford, the Wilberforce Temperance Hotel, 33-35 Queen Street, OX1 1ER



From Oxford History website:

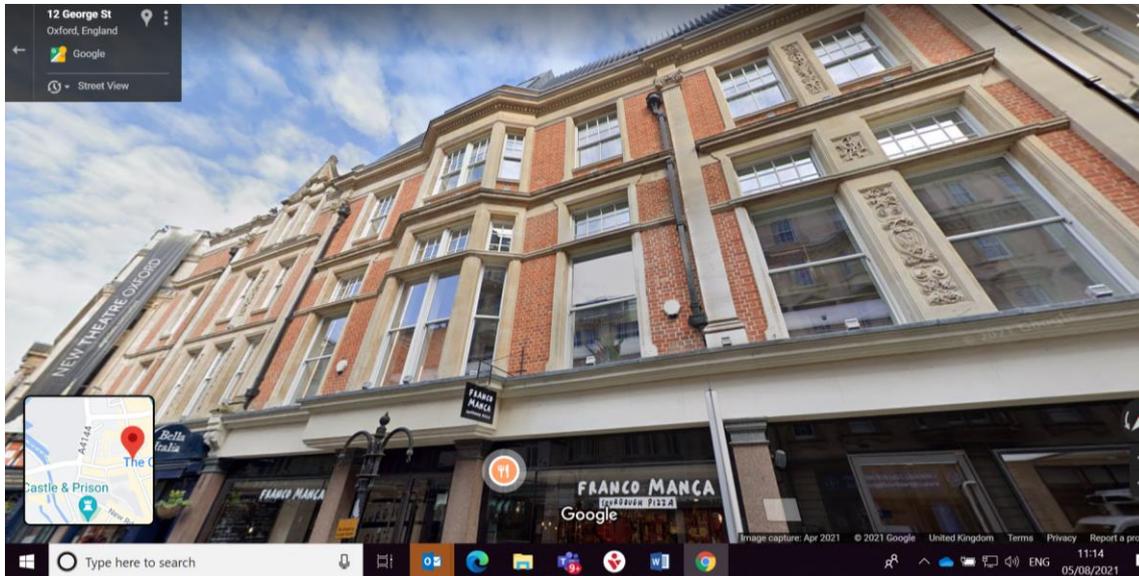
This was built as two shops (No. 33 on the left and No. 35 on the right), with a fine double-arched entrance in the middle leading to the Wilberforce Temperance Hotel (No. 34) upstairs. The five-storey building was designed by F. W. Aubrey of Reading and built by Kingerlee of Oxford at a cost of £5,000. The date of 1888 is given over the central bay window on the second floor. The arms of the University and the City appear over the central entrance on the ground floor and again on the left and right gables at the top.

The following report appeared in *Jackson's Oxford Journal* on 13 October 1888 (p. 6d):

THE WILBERFORCE TEMPERANCE HOTEL. - A noticeable block of buildings has arisen on the north side of Queen-street, on the site of some of the old shops and cottages which formerly stood there. It is known as the Wilberforce Temperance Hotel, there being two spacious shops on the ground floor, one on each side of the entrance, occupied by Mr. Kingerlee and Mr. Radbone. Mr. Kingerlee has two large rooms - one 70 ft. by 23 ft., and the back one 30 ft. by 24 ft., besides offices: and Mr. Radbone's front shop is 40 ft. by 20 ft. The hotel entrance is by a double arch, the curve of each being three centred. The outer one is wider than the inner, and rests on two detached columns of polished red granite, on grey granite bases, with moulded blue granite capitals, with stone finials carried through the cornice above the ground floor windows. The building is in red brick, manufactured by Mr. Kingerlee himself, with Bath stone windows, string courses, and three large dormers in the attic. Over the central archway are bays on the first and second storey. In the centre of the circular head is a shield with the date of the building. The windows in this building, both below and above, look very curious; the four top ones more than anything reminding one of the open mouth of some monster, with huge teeth pointing inwards all round. In the centre of the gables at the west end are the University arms, and in the east those of the City. On the first floor there are dining, sitting, and 12 bedrooms in the hotel portion, billiard-room and offices. On the second floor 12 bedrooms, sitting-rooms, and offices, and on the third floor 12 more bedrooms, besides

accommodation for servants, etc. The contract for the work was close upon 5000l., and the building was erected from designs by Mr. Frederick W. R. Aubrey, of Reading.

12. Former YMCA Building, George Street, Oxford (1891)



The following description is taken from, the 'Discovering Britain' website: 'Workers' playtime: a self-guided walk exploring Victorian Oxford's leisure pursuits'.

This redbrick and stone building used to house the Oxford Young Men's Christian Association. Look up at the middle set of windows and over to the right and you can see a stone carving with the initials YMCA and a date carved into it. The YMCA movement began in the 1840s with the aim of guiding young men spiritually, morally and physically, especially when they were newly away from home and vulnerable to the temptations of city life. The YMCA's vision was to produce young men who would act as leaders and who would in turn positively influence other young men. As was common at the time, this YMCA building incorporated five shops on the ground floor to provide a rental income and to attract the attention of passersby. The central entrance way is now filled in but you can still see the granite pillars which flanked it on either side. From here a staircase led to a lecture theatre, classrooms, meeting rooms, a gymnasium and restaurant. Notice how all these facilities were geared towards improvement and education. The building's architect was FW Albury whose Wilberforce Temperance Hotel we just saw on Queen Street. The attractive facade of this building contributed to a programme of improvements that were being made to George Street at the time, as city centre streets were being redesigned to make them grander and wider for increased traffic.

Extracts from the Old Power Station Vastern Road Reading Berkeley website
 vasternroad.co.uk/heritage – accessed 04/08/2021

www.vasternroad.co.uk/heritage/

**THE OLD
POWER
STATION**
VASTERN ROAD, READING

Berkeley
Designed for life

Home
Background
Heritage
Design Evolution ▾
Current Scheme ▾
Benefits
Feedback

Heritage

Whilst there is little historic imagery of the Vastern Road site and its buildings, the SSE archives provides an insight into the building types that have been adopted over the years. The photographs below provide an overview of the building styles and architecture that have influenced our latest proposals.

Site Development Timeline:

- 1894 Frederick W Albury won the tender to design buildings for the Reading Electric Supply Co. Ltd.
- 1898 Buildings first appeared on a map with a small building close to Vastern Road and the main works building adjacent to the Thames (for ease of coal delivery).
- 1900 Reading Electric Supply Co. Ltd.
- 1912 Reading Electric Supply Co. Ltd (E Rowley Hill engineer and manager) & Reading Roller Skating Rink (on Vastern Road).
- 1920 Reading Electric Supply Co. Ltd & Collier & Catley (building & timber yard) & Allen & Simmonds Co. Ltd (foundry & motor sales depot).
- 1930 Reading Electric Supply Co. Ltd (Walter Barnes FCIS).
- 1940 Reading Corporation Electricity Dept. (J.W. Arthur engineer & manager). John Edwards listed at 55 Vastern Road (possible first reference to locally listed building as accommodation).
- 1950 British Electricity Authority (Southern division) generating station.
- 1960 Central Electricity Generating Board & Southern Electricity Board.
- 1970 Central Electricity Generating Board & Southern Electricity Board. Demolition of the chimney and river fronting warehouse buildings.

1928 - VIEW OF THE SITE FROM THE RIVER THAMES

1936 - AERIAL VIEW LOOKING SOUTHEAST

Click images above to enlarge

Architectural Detail

generating station.

- 1960 Central Electricity Generating Board & Southern Electricity Board.
- 1970 Central Electricity Generating Board & Southern Electricity Board. Demolition of the chimney and river fronting warehouse buildings.

Architectural Detail

When considering the design for the Vastern Road site, it has been necessary to understand the history of the site and how it has evolved over time. The project team has worked with a heritage consultant to document the history of the site. The time-line above demonstrates the evolution of the electricity works over time, leading to the development of the office and substation complex currently occupying the site.



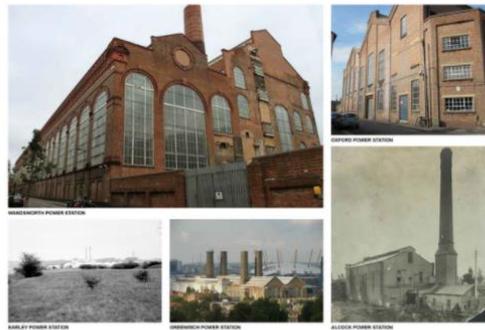
Aerial view of site looking south and brick detailing of turbine hall and furnace chimney

We have explored similar industrial buildings to inform the proposed design.

Power Station Precedents

The images to the right are of power stations built in the same era as Vastern Road and demonstrate similar forms, brick details and materiality. Following analysis of historic photographs of Vastern Road and other power stations constructed around the same period, the key features which have informed our design are:

- Brick as an envelope material
- Distinctive warehouse roof forms
- Chimney
- Arched windows



Click images above to enlarge

Appendix 10

Great Expectations public house, London Street, Reading, RG1 4PS: an example of successful façade retention

