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Dear Sir/Madam,

Historic England Reference Number: 1478559

55 Vastern Road, Reading RG1 8BU – representation against statutory listing

On behalf of Berkeley Homes (Oxford & Chiltern) Ltd (“Berkeley”), I write to make a representation against the inclusion of No. 55 Vastern Road, Reading (“the building”), on the statutory list of buildings of special architectural or historic interest compiled under section 1 of the *Planning (Listed Buildings and Conservation Areas) Act 1990*.

The building is located on a site which is the subject of a forthcoming public inquiry into a redevelopment scheme. Berkeley, owner of the site, is the appellant. The inquiry is due to start on Tuesday 26th October 2021. The building has been included on the List of Locally Important Buildings and Structures maintained by the local planning authority, Reading Borough Council (“the Council”) since May 2017. The Council’s application to Historic England to list the building was dated 15th October 2021. It was therefore sent eleven days before commencement of the inquiry. Berkeley first learnt of the application for listing on Friday 15th October 2021 when it received the rebuttal proof of evidence of the Council’s heritage witness, Mr Bruce Edgar.

I am Berkeley’s heritage witness at the public inquiry. I am Director of the Built Heritage Consultancy. I have been a heritage consultant for over 17 years, dealing with a wide range of projects for clients including English Heritage. I have an MA in Architectural History from the Courtauld Institute of Art and am an Affiliate of the Institute of Historic Building Conservation.

It is not the purpose of this letter to re-open the debate about whether the building should remain on the Local List. However, in passing, it is worth noting that in July 2017 it was the view of Dr David Hickie BSc(Hons) MA PhD CEnv CMLI MIEMA IHBC (formerly Assistant Regional Director of English Heritage [now Historic England]) that the building does not meet the Council’s criteria for local listing¹. It is my view that even if it was properly placed on the Local List, the building plainly does not possess the higher level of significance required for statutory listing.

¹ Dr David Hickie, Heritage Matters (July 2017): *Heritage Review of Local Listing: 55 Vastern Road, Reading*

Statutory listing criteria

I note that the statutory criteria and general principles that the Secretary of State applies when deciding whether a building should be statutorily listed are set out in the Department for Digital, Culture, Media and Sport's document *Principles of Selection for Listed Buildings* (November 2018). The key criteria are that a building should be of 'special architectural or historic interest'. When making a listing decision, the Secretary of State may also take into account: group value; the building's fixtures and features; and the character or appearance of conservation areas. Decisions should also be made with reference to general principles in respect of: age and rarity; buildings less than 30 years old; aesthetic merits; selectivity; national interest; and state of repair.

To supplement these statutory criteria and general principles, and to provide more detail of relevant considerations for determining the interest of particular building types, Historic England has published twenty Listing Selection Guides. Buildings associated with electricity supply are covered by the *Infrastructure: Utilities and Communication Listing Selection Guide* (December 2017). This states (on p. 9) that: 'The 'special considerations' outlined more fully in the selection guide *Industrial Buildings* (HE, December 2017) are relevant to the Utilities which in many ways are a sub-set of the industrial category'.

To demonstrate why the building should not be added to the statutory list I set out below the relevant criteria and principles in these documents, and summarise their relevance to 55 Vastern Road.

Principles of Selection for Listed Buildings

Architectural interest

The DCMS's *Principles of Selection for Listed Buildings* (2018:5) states that:

To be of special architectural interest a building must be of importance in its design, decoration or craftsmanship. Special interest may also apply to particularly significant examples of building types or techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms. Engineering and technological interest can be an important consideration for some buildings. For more recent buildings in particular, the functioning of the building (to the extent that this reflects on its original design and planned use, where known) will also be a consideration. Artistic distinction can also be a factor relevant to the architectural interest of buildings and objects and structures fixed to them.

The front part of No. 55 Vastern Road is of some aesthetic interest through its relatively high-quality design and workmanship, and its materials, which are characteristic of Reading's development at this time. The front elevation is typical of the relatively high quality commercial/public buildings common in the late 19th and early 20th centuries, albeit somewhat derivative and generic in design. Notwithstanding that, its aesthetic interest is undoubtedly much compromised by the infilling of the carriage arch, the clumsy replacement of the door in the bay with a window, the modern front door, the very insensitive uPVC fenestration, surface-mounted wiring and conduits, and (when viewed from across the street) the railing around the roof parapet.

The rear of the principal volume and the narrow range that extends from it were intended to be seen only by those entering the electric works, and they have a very subsidiary character when compared to the building's 'public face'. The limited aesthetic interest of these areas is further diminished by the particularly insensitive infilling of the northern side of the carriage entrance, the

unsympathetic inserted doorway with concrete lintel, the clumsy and insensitive uPVC fenestration throughout, the railing around the roof parapet, the fire-escape stair, and some plastic rainwater and soil pipes, as well as a plethora of surface-mounted paraphernalia such as lights, signage, CCTV cameras, and a photovoltaic panel.

The building retains some historic internal features typical of their period, with a minor aesthetic and historical interest illustrating the building's role as the site manager/superintendent's dwelling. That said, the historic plan form has been notably altered in places and the building has lost its original staircase and chimneypieces. Several spaces retain elements of historic cornicing and joinery, but they are both incomplete and entirely generic to buildings of this period such that their heritage interest is limited. The interiors of this building are unremarkable and greatly altered, while those original decorative features that do remain are standard items found in any number of cellular offices, or indeed houses, of the period. The interior does not have notable heritage value.

In my view, No. 55 Vastern Road is not of sufficient inherent architectural interest – in terms of its design, decoration or craftsmanship – to warrant statutory listing. Moreover, it is not a significant example of a particular building type or technique, nor does it have a significant plan form.

Historic Interest

The DCMS's *Principles of Selection for Listed Buildings* (2018:5) states that:

To be able to justify special historic interest a building must illustrate important aspects of the nation's history and / or have closely substantiated historical associations with nationally important individuals, groups or events; and the building itself in its current form will afford a strong connection with the valued aspect of history.

No. 55 Vastern Road might be considered to reflect an interesting aspect of *local* history – the arrival of electricity in Reading, albeit the building's fabric is in no way illustrative of this function, and the structures in which electricity was actually generated were demolished in c.1970. Similarly, the building's associations with the practice of prominent local architect F. W. Albury are of some *local* historic interest. However, the building cannot reasonably be held to be of illustrative of important aspects of *national* history or to have closely substantiated historical associations with *nationally important* individuals, groups or events.

Other considerations

Group value

The DCMS's *Principles of Selection for Listed Buildings* (2018:6) states that when making a listing decision, the Secretary of State may take into account:

The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.

If the main electric works buildings had survived, it would be reasonable to suggest that No. 55 Vastern Road would have some group value with the site as a whole. As things stand, however, the

building does not form part of a group of buildings that between them exhibit any consciously designed unity, or that together were conceived to perform a particular function.

Fixtures and features of a building and curtilage buildings

The DCMS's *Principles of Selection for Listed Buildings* (2018:6) states that when making a listing decision, the Secretary of State may take into account:

The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.

No. 55 Vastern Road possesses no particular features that would elevate its architectural and/or historic interest to the high level required for statutory listing.

The character or appearance of conservation areas

The DCMS's *Principles of Selection for Listed Buildings* (2018:6) states that:

when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

No. 55 Vastern Road does not lie within a conservation area, and thus no further consideration of this principle is required.

Age and rarity

The DCMS's *Principles of Selection for Listed Buildings* (2018:6) states that:

the older a building is, and the fewer the surviving examples of its kind, the more likely it is to have special interest. ... The relevance of age and rarity will vary according to the particular type of building ...; from 1850 to 1945, because of the greatly increased number of buildings erected and the much larger numbers that have survived, progressively greater selection is necessary ...

No. 55 Vastern Road was erected between 1897 and 1909, and probably in the middle of that period, at a time when large numbers of urban industrial buildings were being constructed across this region of which a significant proportion survive today. It is not a rare survival inasmuch as a great many buildings survive from that period with a similar architecture based on the 'Free Style' of red brick and stone street frontages using various 'Flemish Renaissance', 'Free Classical' and 'Queen Anne' motifs. It is not an early or innovative use of that style. Meanwhile the typology of a gateway building along a continuous street frontage pierced by a carriage arch is fairly common in urban locations of the period, serving any number of sites including dairies, depots, industrial sites and indeed power stations which were a common urban feature in this period. As an entrance / residential building to an industrial site that has now lost all other historic features, 55 Vastern Road does not possess any special characteristics that would elevate its architectural and/or historic interest to the high level required for statutory listing.

Aesthetic merits

The DCMS's *Principles of Selection for Listed Buildings* (2018:6) states that:

the appearance of a building (both its intrinsic architectural merit or any group value) is often a key consideration in listing, but the special interest will not always be reflected in obvious external visual quality. Buildings that are important for reasons of technological or material innovation, engineering or as illustrating particular aspects of social or economic history, may have little external visual quality but can still be of special interest.

No. 55 Vastern Road cannot be held to possess any notable aspects of significance that are not reflected in its external visual quality. The building is not important for reasons of technological or material innovation or engineering. Neither does it illustrate any particularly important aspect of social or economic history. The surrounding site's history as the location of Reading's Electric Works is not in itself of national significance. No. 55 Vastern Road has no functionally specific features that illustrate the original power station use of the site.

Selectivity

The DCMS's *Principles of Selection for Listed Buildings* (2018:6-7) states that:

where a building qualifies for listing primarily on the strength of its special architectural interest, the fact that there are other buildings of similar or identical quality elsewhere is not likely to be a major consideration. However, a building may be listed primarily because it represents a particular historical type to ensure that examples of such a type are preserved. Listing in these circumstances is largely a comparative exercise and needs to be selective where a substantial number of buildings of a similar type and quality survive. In such cases, the Secretary of State's policy is generally to list only the most representative or most significant examples of the type.

As discussed above, 55 Vastern Road is not considered to qualify for listing on the strength of its inherent architectural interest. At the same time, it is not considered so representative or such a significant example of any particular building type (e.g. lodge, gatehouse, power station) that it warrants statutory listing to ensure preservation of that building type.

National interest

The DCMS's *Principles of Selection for Listed Buildings* (2018:7) states that:

the emphasis ... is to establish consistency in selection to ensure that not only are all buildings of strong intrinsic national architectural or historic interest included on the statutory list, but also the most significant or distinctive regional buildings that together make a major contribution to the national historic stock. For instance, the best examples of vernacular buildings will normally be listed because they illustrate the importance of distinctive local and regional building traditions. Similarly, for example, some buildings will be listed because they represent a nationally significant but localised industry, such as shoemaking in Northamptonshire or cotton production in Lancashire.

As discussed above, 55 Vastern Road is not of strong intrinsic national architectural or historic interest. Neither is it such a regionally significant or distinctive building that it can be considered to make a major contribution to the national historic stock, and thus worthy of inclusion on the

statutory list. It exhibits the 'Free Style' that was so characteristic of a significant proportion of the commercial residential and industrial buildings constructed nationwide in the 1890s and 1900s.

State of repair

The DCMS's *Principles of Selection for Listed Buildings* (2018:7) states that:

the general state of repair and upkeep of a building will not usually be a relevant consideration when deciding whether it meets the test of special architectural or historic interest. The Secretary of State will list a building that has been assessed as meeting the statutory criteria, irrespective of its state of repair. Loss of original fabric will however be a relevant consideration when considering special interest.

55 Vastern Road's interest has been notably diminished through various alterations that have been made over time. These include: the infilling of the vehicle entrance and removal of the gates; the blocking up or removal of 10 out of the original 13 internal doorways; the loss of all original doors except one that has been converted into a glazed door; the insertion of 12 new doorways; the removal of the staircase; the removal of chimneypieces; the removal of the rear wall; the removal of the original windows and insertion of uPVC double-glazed units; the truncation of the chimneystacks; and the removal of several room partitions.

Infrastructure: Utilities and Communication Listing Selection Guide

Historic England's *Infrastructure: Utilities and Communication Listing Selection Guide* (2017:9) states that:

*As with all building types, those relating to communications and the utilities have to be assessed in terms of any special architectural or historic interest; here these things may relate variously to their architectural, planning, engineering and technological interest. As with industrial buildings more generally, completeness can be of overriding importance especially where important processes can be illustrated on a single site. (The 'special considerations' outlined more fully in the selection guide *Industrial Buildings are relevant to the Utilities which in many ways are a sub-set of the industrial category.*) Relative date may be significant, as will rarity. Alteration and upgrading is likely to have taken place, and assessment of the authenticity of the structures from a historical point of view will sometimes be necessary. The designation of buildings and structures concentrates on the above-ground evidence of the systems. Below-ground remains and infrastructure, important to the overall understanding as they are, will generally not be designated ...*

55 Vastern Road is the only surviving element from the historic electric works layout, but it is not in any way illustrative of how the site functioned in terms of process-flow. In the context of industrial sites where completeness can be of overriding importance, the loss of the key power generation buildings and all other historic functional infrastructure has fundamentally undermined an understanding of how the site functioned. In such circumstances, surviving buildings are generally considered unlistable unless they are of special interest for some other reason. The building is not of sufficient interest in terms of architecture, planning, engineering or technology, nor is it early for its type, or rare. As discussed above, 55 Vastern Road is not considered to be of sufficient inherent architectural or historic interest to warrant statutory listing.

In respect of electricity supply specifically, the *Infrastructure: Utilities and Communication Listing Selection Guide* (2017:12) states that:

Only the most important power stations are listable. This may include the earliest survivors or key examples of a major development. Generally, however, designation will normally depend on the architectural elaboration of the exterior, the quality of the interiors and the survival of any machinery or switchgear (which is quite rare).

The two main structural components of an electric power station are the boiler house and the engine room or turbine hall, generally attached side-by-side with one or more chimneys. However, these components (which can be seen in aerial photographs from the 1940s) were demolished in c.1970, leaving 55 Vastern Road as the only surviving element from the 'original' layout. No. 55 was likely erected as the entrance lodge for the electric works site, and accommodated a dwelling for the site manager/superintendent on its upper floor. Whilst the building's front elevation has some architectural elaboration, this is derivative and entirely generic, and neither the façade nor any other parts of the building display any direct visible or functional relation to the specific operations of the original power station on the wider site.

Industrial Buildings Listing Selection Guide

Historic England's *Industrial Buildings Listing Selection Guide* (2017:10-11) identifies a number of general principles that should be used to determine the interest of industrial buildings.

Integrated sites

The *Industrial Buildings Listing Selection Guide* (2017:10) notes that:

With industrial sites it is important to consider how they functioned in terms [of] process-flow: from receiving and storing raw materials, via the various manufacturing stages, through to warehousing and the selling of the end product. In addition, other structures may be present which served the needs of the workforce or facilitated maintenance. With sites of acknowledged historic interest, consideration should be given to listing all relevant structures, even where they are architecturally utilitarian. If elements have been lost from the complex, undermining the understanding of how the site functioned, this may make the surviving buildings unlistable unless they are of special interest for some other reason.

As noted above, 55 Vastern Road is the only surviving element from the historic electric works layout, but it is not in any way illustrative of how the site functioned in terms of process-flow. In the context of industrial sites where completeness can be of overriding importance, the loss of the key power generation buildings has fundamentally undermined understanding of how the site functioned. In such circumstances, surviving buildings are generally considered unlistable unless they are of special interest for some other reason. In our view, as discussed above, 55 Vastern Road is not considered to be of sufficient inherent architectural or historic interest to warrant statutory listing.

Architectural display

The *Industrial Buildings Listing Selection Guide* (2017:10-11) notes that:

*Some industrial buildings were deliberately architectural in their design. Architects, where they were employed, often focused their attention on public facing parts of the industrial complex, such as main offices or showrooms: such buildings can be of peripheral interest to the interest of the complex as an industrial site, but may be of special architectural interest in their own right (see the *Commerce and Exchange Buildings selection guide*).*

Whilst the front of 55 Vastern Road was conceived as the 'public face' of the electric works, its architectural display is not of a high enough inherent standard to be considered as having sufficient 'special architectural interest' to warrant statutory listing.

Regional factors

The *Industrial Buildings Listing Selection Guide* (2017:11) notes that:

Some industries are concentrated in particular regions, and designation is a way of capturing representative examples of buildings and complexes which give places their particular character. One example is the boot and shoe industry of Northamptonshire, another being listings in the Kent coalfield which preserve tangible evidence that not all coal came from the great northern coalfields. Some structures are so emblematic of a major national industry that they can be designated even when largely ruinous, as with Cornish tin mining engine houses (Fig 5), many of which also form part of a World Heritage Site

Electricity generation is not a regionally specific industry, whilst 55 Vastern Road cannot be considered so emblematic of electricity generation nationally that it warrants statutory listing.

Machinery

The *Industrial Buildings Listing Selection Guide* (2017:11) notes that:

Because redundant machinery is typically either replaced or sold for scrap, buildings retaining intact nineteenth-century or earlier machinery are exceptional; its presence can provide good justification for designation, sometimes at a high grade. Even where machinery has been removed, sufficient evidence of it may remain to allow a good understanding of manufacturing processes, and in some cases provide justification for designation either via listing or scheduling.

55 Vastern Road never contained any machinery in connection with the wider site's use as an electric works, and does not merit consideration for listing in this regard.

Historic interest, including innovation

The *Industrial Buildings Listing Selection Guide* (2017:11) notes that:

Some buildings may be of special historical interest because they were where new technology was developed, such as Ladywood Works in Lutterworth, (listed Grade II) where Sir Frank Whittle developed the jet engine, one of the defining developments of the twentieth century. In such cases careful consideration needs to be given to how influential the development or variation proved to be; the greater interest will always lie with the 'breakthrough' innovation. Normally there should be some direct evidence of the innovation exhibited in the structure itself. Buildings may also be of special architectural interest for the use of technology in their physical construction (such as fireproofing). Associations with significant engineers, millwrights or entrepreneurs may also give, or enhance, special interest and grading. Individual buildings must be assessed on their own merits. However, it is important to consider the wider context and where a building forms part of a functional group with one or more listed (or listable) structures this is likely to add to its own interest. Examples might include process buildings associated with industrial or military sites. Key considerations are the relative dates of*

the structures, and the degree to which they were functionally inter-dependent when in their original uses.

Neither the electric works at Vastern Road generally (had the main buildings survived), nor No. 55 specifically, can be held to be of special historical interest with regard to innovation.

Summary

In summary, I am strongly of the view that 55 Vastern Road does not satisfy the relevant criteria for addition to the Statutory List.

Yours sincerely,

A handwritten signature in blue ink that reads "James Weeks". The signature is written in a cursive, slightly slanted style.

James Weeks
Director