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Wokingham Borough Council
Planning Department
Shute End
Wokingham, Berkshire
RG40 1BN

22 August 2024

Heritage Statement

Application Address: Land outside 8 London Road, Twyford, Reading, RG10 9ER

Dear Sir/Madam,

Please find enclosed Heritage Statement which accompanies the dual applications for Planning Permission and Advertisement Consent under the provisions of Regulation 62 of the Town and Country Planning Act 1990 and Regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 for the installation of a Communication Kiosk at land outside 8 London Road, Twyford.

A Heritage Statement has been prepared as the application site falls within Twyford Conservation Area, a designated heritage asset in accordance with Reg 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. In designating a Conservation Area, the process is relatively straightforward in that:

“(1)Every local planning authority—

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

(b) shall designate those areas as conservation areas. (Reg 69 (1)).

Within the above Act, Regulation 72 establishes the general duty of the Local Planning Authority to consider planning merits before approval. In particular, the Regulation states *"In the exercise, with respect to any buildings or other land in a conservation area, of any [functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."* (Reg 72). The Heritage Statement will assess the proposal with respect to the Conservation Area and other identified heritage assets, considering the proposed communication kiosks relationship with the character and appearance of the locality as paramount. It is in accordance with the legislation that this application has been prepared and seeks approval for.

Introduction

1. The application letter provides an overview of the dual Planning Permission and Advertisement Consent application for the installation of Communication Kiosk with Wokingham Borough Council. The site has been considered in line with the aims of National and Local Policy in respect of supporting development in a sympathetic way, reflecting the current and ongoing development in the 21st century. The Heritage Statement is specific to 8 London Road due to its position within Twyford Conservation Area and supports the covering letter, plans and specification documents submitted as part of the proposal.

The Proposal

2. The installation of a communication kiosk within Twyford Conservation Area could be perceived to cause less than substantial harm. As part of the proposal, rationalisation of the existing estate will remove some obstruction within the historic fabric while installing a new communication kiosk within an appropriate location. The proposed communication kiosk reflects the instantly recognisable telephone kiosk heritage, ensuring it provides open access for all. The new communication kiosk is a robust construction made of stainless steel which will aid reduction of vandalism and assist with ease of maintenance. Therefore, the perceived effect of the proposal will not be contrary to national or local policy, but simply reflect the ongoing evolution of streetscapes across the United Kingdom.
3. Through the installation of new communication kiosks, the proposed units will provide numerous public benefits. Telephony is still a key provision; it is an important lifeline for many people even with the proliferation of mobile phone use. Our kiosks are regularly used to report emergencies and are used by the vulnerable: 999, 111, Childline, Samaritans and Shelter are all examples of where service provision remains vital, along with the normal use of the general public. The communication kiosk will also offer the additional benefit of touchscreen information to assist users with wayfinding/mapping information. The full details of the communication kiosk can be found within the application covering letter and supporting documentation.

National Policy

National Planning Policy Framework (NPPF)

4. Through development within the urban environment, due to the historic nature of many towns and cities across the United Kingdom, development would occur within a heritage asset and sensitive areas. However, this does not prohibit development as long as there is a full and thorough consideration process. The NPPF requires a description of the heritage asset which is proportionate to the asset's importance. For each site, the relevant historical record would be consulted, and an appropriate assessment of the development would be undertaken, in line with the requirements of Para 200. The significance of the heritage asset should be considered when assessing the effect of the proposed development and the extent to which it will be affected. Where a development will lead to less than substantial harm to the designated heritage asset, the harm should be weighed against the public benefits of the proposal (Para 208).
5. Throughout the NPPF, there is a clear requirement of conservation and preservation of the heritage assets. Conservation, as detailed in the NPPF glossary is identified as "*The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.*" Preservation is *to do no harm* (The legal interpretation established in *South Lakeland DC v Secretary of State for the Environment and Rowbotham* [1991] 2 L.P.R. 97) to the heritage asset. The terms conservation and preservation are therefore concerned with sustaining the significance of heritage assets. These two terms embrace the idea that change can bring about opportunities to enhance the significance of

heritage assets, both through changes to their physical presence, setting and the uses they fulfil.

Planning Policy Guidance (PPG)

Heritage

6. As set out in the NPPF, the assessment of the effect of a development nearby a heritage asset must be determined by its significance and the likely effect on its amenity. The PPG concurs with this assessment and supports appropriate development.
7. Importantly, the term significance is paramount in assessment. The guidance identifies *"Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting."*
8. As further detailed within the guidance *"Heritage assets may be affected by direct physical change or by change in their setting."* which a full assessment is required to understand its importance. This assessment must be from an early stage to support the development process.
9. The guidance identifies all heritage assets having a form of setting; however, the curtilage and the setting may be of varied extent. The guidance provides a broad definition, detailing best practice and stating *"The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations."* This detail can help support the identification of locations in relation to the heritage asset within the

streetscape. This is important as the NPPF *"makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting."*

10. When assessing the proposal, if any harm is identified, it must be weighed against the public benefit of the proposal. Due to the economic, social, and environmental objectives of the proposal, and supporting of national and local policy, the public benefits derived from the proposal will benefit the public at large.

Historic England Guidance

Further specialist advice is contained within Historic England guidance, experts and specialists of England's historical character and culture. Within guidance GPA2, a statement supports the success of development proposals "if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect" (Para 4). Further, Para 6 details a structured approach which should be taken by applications and heritage advisors when assessing and application. The individual stages are –

- 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 cumulative impact of incremental changes must be considered as part of an application. As detailed in Para 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” (Para 28).

Further guidance relating to the setting of heritage assets is also included within Historic England documentation, specifically GPA3. Acknowledging setting and decision-making, Para 17 states *"All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it"* (Para 17). There is therefore an acknowledgment that development can occur within identified heritage assets, however a full consideration of the asset must be undertaken whereby some areas within the same heritage asset could be more suitable for development than other more sensitive settings.

A proportionate assessment of the application should be taken on to allow the significance of the heritage asset to be considered. The guidance sets out broad steps which should be followed for each application:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

From the outset of the proposal, the development has been assessed in these terms and requirements to ensure the heritage assets is fully considered.

Conservation Principles: Policies And Guidance

This document provides a detailed viewpoint on development within the setting of heritage assets. A comprehensive framework is detailed which supports sustainable management, these are known as the Conservation Principles:

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

Similarly to the Historic England guidance above within GPA2 and GPA3, an appropriate process should be followed to allow a full assessment of a proposal within Conservation Areas. The guidance reiterates the importance of assessing and understanding the values of the historic asset and managing any change that occurs. In fact, Paragraph 25 states “*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.”

(Para 25) which supports the concept of an ever-evolving historic urban environment. Within Paragraph 84, the document produces a pertinent point which is appropriate to this development, stating *“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”* (Para 84). Due to the ever-changing nature of the urban environment, while modern interventions have occurred and should be appropriately encouraged, the significance of the heritage asset must not be lost. Further, in accordance with Para 100, the completed works will be completely reversible to support any ongoing change within the streetscape.

Local Policy

Within the local policy documents of the Core Strategy 2010 and Managing Development Delivery (MDD) 2014, Wokingham Borough Council sets out a number of ambitious but achievable aims to develop the Borough. The Local Plan policies, like the NPPF, sets a presumption in favour of sustainable development within Core Strategy policy CP1 and MDD policy CC01. The proposed development for the deployment of a communication kiosk provides a sustainable development opportunity for street furniture in an economically, environmentally, and social manner.

Policy CP3 supports the general principles for development and the desire for Wokingham Borough Council to enhance the public realm and accessible schemes. The Policy states:

“Planning permission will be granted for proposals that:

a) Are of an appropriate scale of activity, mass, layout, built form, height,

materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life;

b) Provide a functional, accessible, safe, secure and adaptable scheme;

c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.

d) Maintain or enhance the ability of the site to support fauna and flora including protected species;" (Policy CP3)

As described in the details above, the proposed kiosk supports these aims and objectives. The MDD policy CC03 further states "*Development proposals should demonstrate how they have considered and achieved the following criteria within scheme proposals: ...*

d) Protect and retain existing trees, hedges and other landscape features

e) Incorporate high quality, ideally, native planting and landscaping as an integral part of the scheme" (Policy CC03).

The aims of this Policy are achieved through the applicant's partnership with Trees for Cities. Further, the proposal will be respectful to these aims through the installation of an inclusive and open plan kiosk.

Further, the proposal will be respectful to identified heritage assets within the area. This includes Listed Buildings and Conservation Areas as set out in TB24 of the MDD which states:

"2. The Borough Council will conserve and seek the enhancement of designated heritage assets in the Borough and their settings by:

a. Requiring works to or affecting heritage assets or their setting to demonstrate that the proposals would at least conserve and, where possible

enhance the important character and special architectural or historic interest of the building, Conservation Area, monument or park and garden including its setting and views.

b. Supporting development proposals or other initiatives that will conserve and, where possible, enhance the local character, setting, management and historic significance of designated heritage assets, with particular support for initiatives that would improve any assets that are recognised as being in poor condition or at risk” (Policy TB24).

As an integral part of the Communication Kiosk, the advertisement display on the reverse of the kiosk is required to be assessed on its own merits. Policy TB19 of the MDD details Wokingham Borough Council’s approach to the application, setting out:

“The Council will only permit outdoor advertisements where they demonstrate:

d) There is no adverse impact upon highway safety

e) There is no harmful impact on the amenity of the adjoining land uses

f) There is no harmful impact on the character or appearance of the area”

(Policy TB19).

While one frontage of the Communication Kiosk would contain an advertisement display, the primary use of the kiosk is for telecommunication purposes. The open and inclusive design will ensure the communication equipment is accessible to all, and the style of the kiosk ensures the use is clear and legible to any passer-by. While some effect maybe perceived within or nearby a heritage asset, the kiosk will provide a level of enhancement through its design and public benefits to support its approval.

The installation of the Communication Kiosks across the Borough supports the need for appropriate telecommunication equipment. While there is no specific telecommunication policy, the inclusive and functional design of the communication kiosk supports the Council's aims to ensure developments *"Provide attractive, functional, accessible, safe, secure and adaptable schemes"* (Policy CP1).

The installation of a communication high of a high standard of build quality and heritage design, while providing additional public benefits, holistically achieves these development goals.

Conservation Area Appraisal

Within the pertinent guidance set within the Conservation Area Study, the policy describes the Conservation Area as an area which was *"The Twyford Conservation Area is focused on the High Street and London Road—in other words along the original Old Bath Road.*

The building styles in the Conservation Area are generally modest with a mixture of rendered and red brick frontages. Building heights vary between two and three storeys with gabled dormer windows in the roofs" (Para 1-2 - Twyford Conservation Area).

Further, *"The High Street in particular retains many historic buildings some of which reflect the village's agricultural past and its role in serving long distance travellers along the road to Bath, as well as previous occupations such as milling. Moving out from the central cross-roads, the first parts of both Wargrave Road and London Road feature many large double fronted detached properties, generally two-storey and red-brick"* (Para 4-5 - Twyford Conservation Area).

Within the Conservation Appraisal, the document supports National and Local policy, whereby “*Conservation areas are living communities which must be allowed to change over time in order to retain vitality and prosper. Consequently the emphasis is to guide and control development rather than to prevent it. It is important that all new development should be sympathetic to the special architectural and aesthetic qualities of the area, particularly in terms of scale, design and materials*” (Para 12 - Twyford Conservation Area).

Site Appraisal

The proposed application site is located within the centre of Twyford, within a small shopping parade along London Road. The ground floor properties all have an active frontage, with numerous colours and branding at pedestrian level. The pavement open with a relatively coordinated line of bollards along the roadside kerb edge.

The installation of a communication kiosk will support the telephony coverage of the area within a structure of high build quality and heritage design. The proposed communication kiosk will ensure a base level coverage of telephony provision within an accessible and inclusive kiosk while including additional public benefit of the touchscreen. The proposed communication kiosk will sit within an area of retail context and have a limited effect on pedestrian flow. If any harm is perceived, the public benefit of the proposed communication kiosk, as described above, would support this application.

The local area while having numerous retail outlets, is a dormitory village with most residents utilising the location for commuting. There are continuous ground floor commercial frontages within the centre, such as a travel agents, kitchen and bathroom companies and betting shop. The style and finish are muted but mixed, with numerous sizes and colours of displays. The first floor has some architectural merit with an appropriate tiling finish and windows. On the opposite side of the road, the style of design holds less merit with a rather dated brick finish. The area lies within Twyford Conservation Area, but the proposed communication kiosk does not affect the curtilage or setting of a Listed Building. Accordingly, a Heritage Statement will be required for this application. The proposed communication kiosk with its traditional design and high build quality will reflect and enhance the identified local character.

The proposed kiosk will some distance from an identified traffic-controlled junction, however, will be near a dropped kerb entrance. The communication kiosk will be a distance away as to allow existing and entering vehicles the ability to observe oncoming vehicles and pedestrians without conflict. Further, the advertisement display will be orientated away from the entrance to alleviate concerns regarding the relationship with the display. The installation will have a limited effect on pedestrian flow or likely desire lines. The integrated advertisement display will be subject to the below conditions to ensure continued operational management. Therefore, the proposal will not create public safety conflict with National or Local aims.

Proposed Conditions

Illumination

The illumination of the panel to the viewer's eye is similar in brightness to existing on street advertising panels using florescent lighting, and well within the recommended limits. The panel can be controlled, and it is recognised that at nighttime less light is needed for the displays to be visible, and more light is needed to be emitted during the day to compete with the sunlight strength.

The brightness of the display will be controlled by the ambient environmental control, which automatically adjusts the brightness level of the screen to track the changes in light level in the environment throughout the day. This ensures that the perceived brightness of the display is maintained at a set level. The level of illumination during the hours of darkness will be 300cd/m². This is well below the maximum level recommended by the Institute of Lighting Professionals in their 'Professional Lighting Guide 05', The Brightness of Illuminated Advertisements which is 600cd/m² for this zone.

Digital Displays

The digitally generated display will produce sequential images. These will contain no full motion video or displays unless consent has been granted for such movement. Advertising copy shall not change more frequently than every 10 seconds and the transition to the next advertisement will be via a smooth fade.

Advertisement Regulations

All digital displays shall conform to the five 'Standard Conditions' specified in Schedule 2 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

Conclusion

The dual application for Planning Permission and Advertisement Consent has been submitted for the installation of the communication kiosk at 8 London Road. This Heritage Statement was prepared to support the application as the site falls within Twyford Conservation Area. It is considered that the proposal fully understands the significance of the identified heritage asset and concludes the communication kiosk will be an appropriate form of development in accordance with national and local policy. The proposal reflects the changing nature of urban streetscapes while providing a significant public benefit. I trust the above Heritage Statement and enclosed documentation clearly illustrate the details of the proposal.