

Tel: +441182378651 (Direct Line)
Email: tariq.bailey-biggs@wokingham.gov.uk
Date: 20.02.2025

Our ref: 242156
Pins Ref: APP/X0360/Y/25/3358629



**WOKINGHAM
BOROUGH COUNCIL**

Temple Quay House
2 The Square
Bristol
BS1 6PN

Environment
Development Management Team
P.O. Box 157
Shute End, Wokingham
Berkshire RG40 1WR
Tel: (0118) 974 6000
DX: 33506 - Wokingham

Dear Sir(s)

Site Address: 11 The Terrace, Wokingham, RG40 1BP

The case for refusing the proposed development is set out in the officer's report and decision notice. The Local Planning Authority however wish to make the following additional comments in response the Appellant's Statement.

The LPA's Built Heritage Officer's comments have been incorporated throughout this Statement of Case, and a full copy of these comments is provided in Appendix 1.

Planning History

It should be noted that two similar applications were previously submitted in 2023 and 2024 for comparable proposals.

The first householder application, along with the accompanying listed building consent (references 230824 and 230825, respectively), sought permission for *"the proposed erection of a single-storey rear extension following the demolition of the existing rear extension, along with internal alterations."* Among the proposed internal changes was the creation of a new opening between Bedrooms 1 and 3 of the appeal property. However, both applications were withdrawn on 18/06/2023 following advice from the LPA's Built Heritage Officer, who indicated that the accompanying heritage statement did not provide sufficient justification for the proposed internal alterations.

A subsequent householder and listed building consent application (references 231544 and 231545) was then submitted, seeking permission for *"the proposed internal alterations to convert Bedroom 3 into a dressing room and ensuite shower room, with a new door opening between Bedroom 1 and Bedroom 3."* The householder

application was withdrawn on 14/02/2024, while the listed building consent application was refused for the following single reason:

The proposed door opening between Bedroom 1 and Bedroom 3 would cause harm to the designated heritage asset through the loss of historic fabric and would not preserve or enhance the character or appearance of the conservation area. Furthermore, the supporting heritage statement fails to provide a clear and convincing justification for the resulting harm. The proposals are therefore contrary to Sections 4, 12, and 16 of the NPPF (2023), Policies CP1 and CP3 of the Core Strategy, and Policy TB24 of the Managing Development Delivery Local Plan.

A copy of the LPA's Built Heritage Officer's comments on this application is provided in Appendix 2.

Impact on no.11 The Terrace as a Grade II listed building

The Terrace is a 16th-century single-cell timber-framed building that has undergone alterations in subsequent centuries. Its historic fabric – including traditional materials, modest scale and restrained detailing – is key to its special architectural and historic interest. The integrity of the building is also linked to its legible historic plan form, which is characterised by a linear 'front-to-back' circulation pattern established in the 19th century, clearly distinguishing the 16th-century core from later additions. These observations are consistent with the assessments made by the LPA's Built Heritage Officer.

The proposed opening between Bedrooms 1 and 3 is of particular concern. Although the appellant contends (para 6.6 and 6.7, pg. 9) that the affected fabric is of uncertain date and that the loss is minimal, insufficient exploratory work has been undertaken to determine the full extent and significance of the timber framing in the wall. Given the building's 16th-century origins, there is a distinct possibility that the wall contains historic timbers, including wind braces and vertical studs – as specifically noted by the LPA's Built Heritage Officer. As illustrated by similar 16th-century structures (see Figure 1) these elements are vital both structurally and historically.

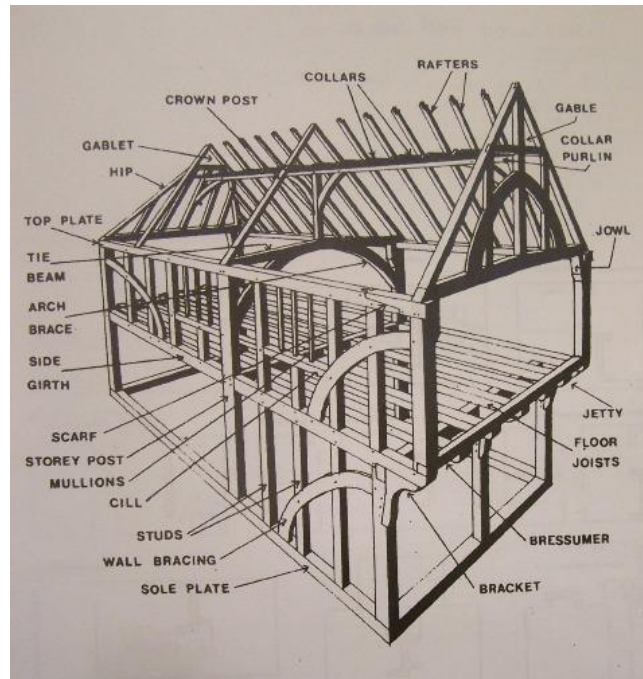


Figure 1 – A broadly similar sample 16th century timber framed structure to the core of 11 The Terrace, showing the wind brace and studs on the first floor. There is potential for 11 The Terrace to have a similar arrangement.

If present, any alteration or removal to accommodate the new opening would directly damage the special architectural and historic interest of the listed building. More invasive or non-invasive investigations – such as thermal imaging (see Figure 2) – may be required to ascertain the nature of this fabric, but until such information is secured, the principle of an opening in this location cannot be supported.

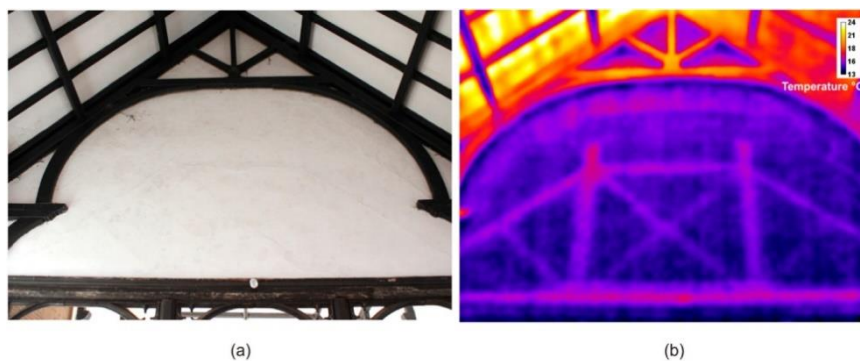


Figure 2 – Thermal imaging showing timber framing hidden beneath plaster. Source: Thermal Imaging for the Archaeological Investigation of Historic Buildings by Christopher Brooke Department of History, University of Nottingham, Published: 3 September 2018

Impact on Plan Form and Internal Layout

The current internal configuration, particularly the linear ‘front-to-back’ route maintained on both the ground and first floors, is a crucial aspect of the building’s evolved plan form. Historically, the 1870s addition provided an entrance hall and an additional bedroom, and it has always maintained a clear separation from the 16th-

century core. This separation allows the primary element to be read and understood in its own right, thereby contributing significantly to the building's overall significance – a point emphasised by the LPA's Built Heritage Officer.

The creation of a lateral or 'latitudinal' route by connecting the 16th-century core with the later addition would disrupt this clear delineation. Such a change would result in the loss of evidential value in interpreting the evolution of the building's plan form. Even if the alteration were viewed as a minor remodelling in other contexts, in a structure where historic legibility is paramount, the introduction of a new route would obscure the distinction between the primary 16th-century element and its subsequent additions.

Furthermore, the proposed removal and blocking up of the existing 19th-century door – along with the installation of a new stud partition in Bedroom 3 – would further erode the historic evolution of the building. While the appellant contends (para 5.6, pg.14) that these changes are in keeping with the building's history of episodic remodelling, such comparisons are misplaced. Past alterations (for example, the cessation of use of a servants' stair or the introduction of gas and electric services) were driven by necessity and were sympathetic to the building's evolution. In contrast, the current proposal is driven by private convenience and would compromise the established plan form without providing any demonstrable public benefit.

The appellant asserts (para 6.7, pg.9) that the minor loss of fabric should not detract from the overall significance of the building, arguing that the property remains legible as an evolved postmedieval dwelling. However, the Council's assessment – informed by the LPA's Built Heritage Officer – is that the loss of historic fabric, particularly if it involves key structural elements such as wind braces and vertical studs, would have a disproportionate impact on the building's architectural integrity.

The argument that episodic remodelling is a common feature of historic properties does not justify any alteration which undermines the legibility of the original plan form. The clear separation between the 16th-century core and the later 19th-century addition is a critical component of the building's significance. Creating a new lateral connection would obscure this separation, reducing the evidential value of the building's evolution and permanently impacting its special interest.

Additionally, whilst the appellant suggests (para 6.7, pg.10) that the internal layout at first floor level is 'unsatisfactory' and requires a 21st-century response, this must be weighed against the need to preserve its historic character. According to paragraph 202 of the NPPF, any harm to a designated heritage asset must be offset by clear public benefits. In this case, the proposed changes offer no such benefits, as they are intended solely to serve the private convenience of the current occupier.

Paragraph 202 of the NPPF stipulates that any less than substantial harm to the significance of a designated heritage asset must be balanced against public benefits.

Here, the appellant has not demonstrated any public benefit that would justify the loss of historic fabric or the erosion of the historic plan form.

Policy CP3 of the Wokingham Borough Core Strategy mandates that development should have no detrimental impact on heritage assets, whilst Policy TB24 of the Managing Development Delivery Local Plan requires that any work to a heritage asset must at least conserve – if not enhance – its important character and special architectural or historic interest. The proposed alterations clearly fail to meet these requirements. The irreversible loss of significant historic fabric, including potential key timber elements, and the disruption of the established plan form would undermine the building's special interest, thereby conflicting with both local and national policy.

As such, the cumulative harm – from the potential loss of key structural elements to the erosion of a historically legible plan form – cannot be justified on the grounds of private residential convenience. No evidence has been presented to provide a clear and convincing justification for such harm under the relevant statutory and policy frameworks.

Conclusion

The LPA remain strongly of the view that the proposed alterations to 11 The Terrace would result in an irreversible loss of historic fabric and a fundamental disruption to the evolved plan form of the listed building. The potential removal of significant timber elements (including wind braces and vertical studs) and the creation of an unauthorised lateral connection between the 16th-century core and the later addition would detract from the building's special architectural and historic interest.

Given that the benefits of the proposal are purely private, and no public benefits are identified, the proposed works fail to comply with Section 16 of the NPPF, Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Policy CP3 of the Wokingham Borough Core Strategy, and Policy TB24 of the Managing Development Delivery Local Plan.

Subject to the foregoing, the LPA asks that the Inspector respects the consistency of approach taken by the Council in previous applications for the site. Consequently, it is requested that the appeal is dismissed. However, if the Inspector is minded to allow the appeal, the inclusion of appropriate recommended conditions are outlined in Appendix 3.

Tariq Bailey-Biggs, BSc (Hons), MSc.
Planning Officer
Development Management
Wokingham Borough Council