

DELEGATED OFFICER REPORT



**WOKINGHAM
BOROUGH COUNCIL**

Application Number:	182220
Site Address:	Urban Regional Studies Building, University Of Reading, Reading, RG6 6AE
Expiry Date:	21st December 2018
Site Visit Date:	24.10.2018
Proposal: Full Planning Application for internal and external alterations and extensions existing building and external works including new footpath, landscaping and external working area	

PLANNING CONSTRAINTS/STATUS

- Major development location
- Grade II Listed Building
- Historic Park and Garden
- Combined Core Employment, Science Park, and Whiteknights Campus: Whiteknights Park, Earley
- Public right of way
- Bat potential
- SSSI impact risk zone

PLANNING POLICY

National Policy	National Planning Policy Framework (NPPF) National Planning Policy Guidance (NPPG)
Core Strategy (CS)	CP1 – Sustainable development CP3 – General Principles for Development CP4 – Infrastructure Requirements CP6 – Managing Travel Demand CP7 – Biodiversity CP9 – Scale and location of development proposals
MDD Local Plan (MDD)	CC01 – Presumption in Favour of Sustainable Development CC02 – Development limits CC03 – Green Infrastructure, Trees and Landscaping CC04 – Sustainable Design and construction CC06 – Noise CC07 – Parking CC09 – Development and Flood Risk CC10 – Sustainable Drainage TB07 – Internal Space Standards TB14 – Whiteknights Campus TB23 – Biodiversity and development
Other	Borough Design Guide Supplementary Planning Document CIL Guidance + 123 List

PLANNING HISTORY

Application No.	Description	Decision & Date
182221	Application for listed building consent for the internal and external alterations and extensions existing building and external works including new footpath, landscaping and external working area	Pending
	Various pre-apps	

CONSULTATION RESPONSES

WBC Biodiversity	No objection subject to condition.
WBC Drainage	No objection subject to condition.
WBC Environmental Health	No comments received.
WBC Highways	No objection subject to condition.
WBC Tree & Landscape	Requests additional information. However these could be addressed byway of condition.
WBC Public Rights of Way	Public Footpath diversion will need separate approval at planning committee.
WBC Conservation Officer	Objection.
English Heritage	Objection.
21C Society:	Objection.

REPRESENTATIONS

Parish/Town Council	None received.
Ward Member(s)	None received.
Neighbours	None received.

APPRAISAL**Site Description:**

The proposal site lies within the Whiteknights campus of the University of Reading and wholly within Wokingham Borough's boundary.

The proposal site consists of a Grade II building which was listed as such in 2016. Its listing includes the URS building, the paved surface of Chancellors Way and raised edges of the ornamental pool which was built in 1970-72 by HKPA.

Proposal

It is proposed to extend and alter the URS building in order to accommodate School of the Built Environment (SoBE). The SoBE would comprise Architecture and Construction Management and Engineering (CME) and The School of Arts and Communication Design (SACD).

The proposal would consist of the below extensions and alterations;

North Elevation

- Removal of steps to the north
- Infilling of overhang with glazing (which extends from ground to first floor)
- Erection of a glazed three storey entrance area (extending from ground to the roof)
- Erection of a glazed three storey stair core

Changes across elevations

- Alteration/replacement of fenestration
- Programme of repair to the external envelope;

Internal alterations

- Internal alterations including work to widen the central corridors and the removal and alteration of internal partitions;
- Removal of the central staircase;

Principle of Development:

The National Planning Policy Framework has an underlying presumption in favour of sustainable development which is carried through to the local Development Plan. The Managing Development Delivery Local Plan Policy CC01 states that planning applications that accord with the policies in the Development Plan for Wokingham Borough will be approved without delay, unless material considerations indicate otherwise.

The site is located within settlement limits.

Policy TB14 of the MDD sets out that The University of Reading is a national and international educational establishment of strategic importance and that the Whiteknights Campus as defined on the policy map will continue to be a focus for development associated with the University of Reading, and such development includes additional teaching, and research accommodation. It also sets out criteria that development proposal will accord with, which includes that 'they respect the historic

landscape, open areas and listed buildings and their settings and the character of the area.

Impact upon the Grade II Listed Building

The subject building, known as URS, was originally called the College of Estate Management building (1970-3) and was designed by Howell, Killick, Partridge & Amis to house the College following its incorporation into the University of Reading. The building was listed at Grade II in July 2016 for the following reasons;

- **Architectural interest:** the expressive use of structure to enclose space, which references traditional Japanese construction, and the playful exaggeration of the post and lintel joints, give the building drama, wit and virtuosity
- **Planning interest:** the practical, cost efficient, central corridor plan is innovatively re-imagined to bring natural light into the core of the building and to create a linear plan of dynamic cross section;
- **Architects:** the building comes towards the end of HKPA's impressive sequence of educational buildings; expressing elements of this important practice's architectural philosophy while being an idiosyncratic and creative response to its brief.

The building is composed of an exposed reinforced concrete frame finished in ochre-coloured cement, aluminium panels, and aluminium windows. The low pitched roofs are covered with aluminium sheet.

The building has a long narrow footprint with the north elevation facing onto open space. It has 4 floors, plus a basement a partial fifth floor with plant room over. Its form is centred on a 120m long top lit spine, forming the principle internal circulation space taking the form of a double corridor sandwiching a central core of staircases, lifts and lightwells. There is a small ground floor infill extension, but other alterations are limited to minor internal rearrangements of partitions to subdivide or open up rooms in the building.

The building's significance largely resides in the architectural value of its exterior. The buildings expressed structure is a typical feature of HKPA's work recalling their interest in oriental timber construction and structural expressionism. Here, the trabeated post and lintel aesthetic is translated to reinforced concrete and amplified to a 'monumental scale, creating a distinctive and extrovert aesthetic'. It is a didactic building, showing how structural loads are transmitted. The buildings elevations are formed of irregular projections breaking up its length with vertical and horizontal cut-aways. The exposed structural frame consists of a strong bay rhythm, with exaggerated post and beams with fork ends resting/ or supporting shouldered ends of columns. The most dramatic projection is to the north, the supporting structural columns forming a colonnade.

The buildings structure is exposed internally as it is externally, with the beams tapering in depth and forking as the engineering requires. The top-lit stairwells and lightwells are enclosed in timber and glass screens with vertical mullions allowing the light through the building. The timber detailing is in HPKA's consistent style. Internal walls are painted concrete block, and doors are mainly flush panel, some with two glazed panels, some which have been replaced.

This submission is the result of an extensive period of pre-application consultation, negotiation and revisions and the current proposal to alter, refurbish and extend this Grade II Listed building.

Internal alterations

The proposed internal alterations include work to widen the central corridors and the removal and alteration of internal partitions, and removal of the central staircase. These alterations, including the removal of the staircase, are justified by the need to improve circulation and it is noted that two staircases survive elsewhere in the building.

This was considered to result in a low level of harm to the significance of the Grade II Listed Building by Historic England and the Council's Conservation officer.

Changes across elevations

The proposed changes across the elevations involve a programme of repair to the external envelope, and replacement windows. Whilst replacing all the windows would remove the original window details, these are considered to be unremarkable standard glazing units and their replacements would be similar in format and appearance. As such, this would not harm the architectural quality of the building. The proposed repairs across the building are welcomed. As such, the proposal was considered to result in a low level of harm to the significance of the Grade II Listed Building by Historic England and the Council's Conservation officer.

Proposed extensions

The extensions proposed consist of a three storey extension and stair case extension. Historic England and the Council's Conservation Officer consider that the proposed three storey extension, and stair case extension would result in a low level of harm to the significance of the Grade II Listed Building.

Proposed infill extension

The proposal includes the infilling the undercroft with a glazed wall to the north elevation. However, Historic England, the Council's Conservation Officer and C 20th share significant concerns regarding the proposed infilling of the covered walkway on the north elevation.

Extensive pre-application discussions have been undertaken to try to address this remaining concern. This current submission offsets the glazed screen back in order to expose the concrete spandrels but would still be forward of the columns. Frameless glazing with minimally reflective glass is also proposed. Despite these changes, however, this part of the scheme is still considered to result in serious harm to this aspect of the buildings significance. Historic England and the Councils Conservation officer have advised that they consider the level of harm to be substantial in NPPF terms.

This is because the buildings significance largely resides in the architectural value of its exterior through the dramatic expression of its structure and this is particularly striking and communicated in its northern elevation.

The covered walkway – including its columns and concrete spandrels - is considered to be a key component of the design of the building and without it much of the building's architectural distinctiveness would be lost. A frameless glazed wall, as proposed, would not be invisible, and chairs, equipment, and other paraphernalia it would read as the edge of the building and the sense of progression and recession along the façade, along with the intended expression of the structure through its columns would be deeply compromised.

The Planning Practice Guide makes it clear that minor alterations or development that does not directly affect a listed building can be considered substantial harm. It states that 'in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest' (017 Reference ID: 18a-017-20140306). This is a high test, but Historic England have advised that the significance of this building rests almost entirely on the sculptural qualities of the exterior, and that the proposals would seriously compromise these qualities.

English Heritage also noted that the Heritage Statement submitted in support of this application, arguing that the harm would be less than substantial and citing the Bedford case in support of this view. English Heritage argue that this judgment was based on different planning guidance and should not be regarded as binding. The Planning Practice Guide, which post-dates the Bedford judgment, provides a clearer framework for assessing harm and can be applied as it stands.

Policy TB24: Designated Heritage Assets sets out that the Borough Council will conserve and seek the enhancement of designated heritage assets in the Borough and their settings by:

- 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.
- 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.
- Proposals for building works shall retain or incorporate existing features or details of historic or architectural significance or design quality into the scheme.

Para 193 of the NPPF sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation.

Para.194 adds that any harm to the significance of a designated heritage asset should require clear and convincing justification.

Paragraph 195 of the NPPF sets out that where a proposed development will lead to substantial harm to a designated heritage asset, the local planning authority should refuse consent, unless it can be demonstrated that the substantial harm 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 can be found 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

The Planning Practice Guidance defines 'public benefit' as '*anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 7) ...do not always have to be visible or accessible to the public ... and that public benefits may include heritage benefits such as sustaining or enhancing the significance of a heritage asset and the contribution of its setting and securing the optimum viable use of a heritage asset in support of its long term conservation.*

The agents have set out that the public benefits of the proposal would consist of;

- securing the retention and long-term viability of the heritage asset for its optimum viable use, noting that if the project does not proceed that the building will be left with no future use and beyond legislative compliance will not attract future economic investment
- Allow the university to realise its vision for the School of the Built Environment
- Allow the University to realise its Estate strategy with consequent environmental and sustainability benefits
- Improved environment performance of the building
- Provide public access to and increase level of public use of the URS building through creation of exhibition spaces
- Providing greater public appreciation of the building through the realignment of the public footpath around the front of the building.
- Achieve re-use of the building – the undercroft infilling being reversible.
- Employment and economic benefits through construction and operation

However, it is not considered that the benefits of the proposal are so substantial to outweigh the substantial harm to the heritage asset.

For clarity, discussion have been had during both pre-application and through the processing of this application to resolve the substantial harm arising from the proposal.

This includes the suggestion from English Heritage to alter the glazing so that the vertical (column) supports (the exoskeleton of the building) are still exposed as intended, as to resolve the substantial harm that would result.

Whilst the agents have set out that a certain square meterage is required for the school to carry out its functions and that there is no suitable alternative site. However, the area that would be required to be removed in order to expose the exoskeleton (setting the glazing behind it) in question is relatively narrow (around 3.6m deep) and intersected by the columns – creating a relatively restrained area. It is not been clearly set out or demonstrated that losing this area in order to expose the exoskeleton would be detrimental to the operation of the school so that it would not secure the retention and long-term viability of the heritage asset or allow the university to realise its vision for the School of the Built Environment. Conversely, it has not been demonstrated that the public benefits of retaining this area and requiring the glazing in the position as proposed would be so substantial to override the substantial harm that would result.

It is considered that the proposal, with or without the proposed extent of infilling of the undercroft on the north elevation, would allow the University to achieve improved environmental performance of the building, provide public access to and increase public use of the building. The ‘public appreciation of the building’ would still be achieved through the realignment of the public footpath, re-use of the building, and employment and economic benefits through its construction and operation.

It should also be noted that the PPG defined a public benefit to include sustaining or enhancing the significance of a heritage asset and the contribution of its setting which is required to be weighed in the planning balance. In this instance such harm to significance would be substantial.

The proposal would also not achieve the criteria as set out in para 195 and it has not been demonstrated that all criteria A, B, C and D of para 195 has been met.

English Heritage have similarly advised that it is their view that the public benefits should not be considered to be substantial and to outweigh the harm caused, an exceptional case for the works proposed has not been made, nor have these tests been met. They argue that it is a useful building in its current form, it is reasonably flexible and a reasonably high degree of change can be accommodated with only limited harm to its significance. English Heritage go on to argue that it would not be difficult to find a viable use for it in the medium term, even if it is not that currently envisaged.

In taking these considerations into account as a whole, the proposal would result in substantial harm to the Grade II Listed Building, as advised by English Heritage, the Council's Conservation Officer, and the 21C Society. In applying para 195 of the framework, no substantial public benefits have been demonstrated or reasoned that would outweigh such substantial harm, and the remaining criteria of 195 would not be met. As such, the proposal would be contrary to the NPPF, policy TB24 of the MDD and Policy TB14 of the MDD.

Neighbouring Amenity:

Overlooking, Loss of Light, Overbearing:

Given the distance of the proposal from the surrounding residential occupiers, the proposal would not result in harm to residential amenity byway of overlooking, loss of light, or overbearing impacts.

Highway Access and Parking Provision:

The proposal consists of an extension to an existing building within the university campus and forms part of the universities overall vision. The proposal does not seek a significant change in staff or student numbers and as such would not result in an adverse impact on the highway network.

There is a public right of way that runs along the northern side of the building and this would need to be diverted as a result of the proposal. The council's Public Right of Way officer has been consulted and has advised that separate approval is required at planning committee is required to achieve this. An alternative route has been proposed and no objection is had to this in planning terms.

Flooding and Drainage:

The proposal site is located within flood zone 1 and subject to a condition securing drainage details, the council's drainage officer has no objection.

Landscape and Trees:

The council's landscape and tree officer has no objection to the re-routing of the public footpath or the hard or soft landscaping proposals, but seeks additional information with regards to the engineering details of the footpath. It is considered that such information can be secured byway of condition.

Ecology:

The site is located within habitat that matches that where bat roosts have previously been found in the borough. The preliminary ecological appraisal (Ecological Planning & Research Ltd, February 2015) and the bat survey (Ecological Planning & Research Ltd, November 2015) letter reports submitted with this application are three years old, however the council's ecology consultee advises that it is unlikely that the conditions of the site have changed significantly, and as such considers the results to still be valid.

The council's ecologist considers that the ornamental pond is not suitable for Great Crested Newts and the terrestrial habitat surrounding the pond is also not suitable as lacks connectivity with suitable habitat. As such, further surveys are not required

The preliminary ecological appraisal letter report stated that the building has a number of features that offer potential to support roosting bats and the building was assessed having low potential for use by roosting bats. The report outlined that two dusk emergence/dawn re-entry surveys would need to be carried out.

The bat survey letter report details the results of one dusk emergence and one dawn re-entry surveys carried out in August. The surveys have not been undertaken strictly in accordance with the Bat

Conservation Trust Bat Survey Guidelines which state surveys should be at least two weeks apart and the dawn survey should start 90 minutes before sunrise (the dawn survey started 75 minutes before), however, it is considered that the findings of the report are accurate. The report states that no bats emerged or re-entered the building during the survey. The report concludes that the building is unlikely to host roosting bats and as such, no further surveys or action need to be undertaken.

As per the plans submitted, no trees are to be felled as a result of the proposals. However, the report states that any vegetation removal should be undertaken outside the bird nesting season (May-August inclusive). These should be conditioned to ensure that no birds are disturbed or harmed during the development.

As such, subject to condition, the proposal would be acceptable in this respect.

RECOMMENDATION	
Recommendation:	Refuse
Date:	11 December 2018
Earliest date for decision:	

Recommendation agreed by: (Authorised Officer)	
Date:	18/12/18