

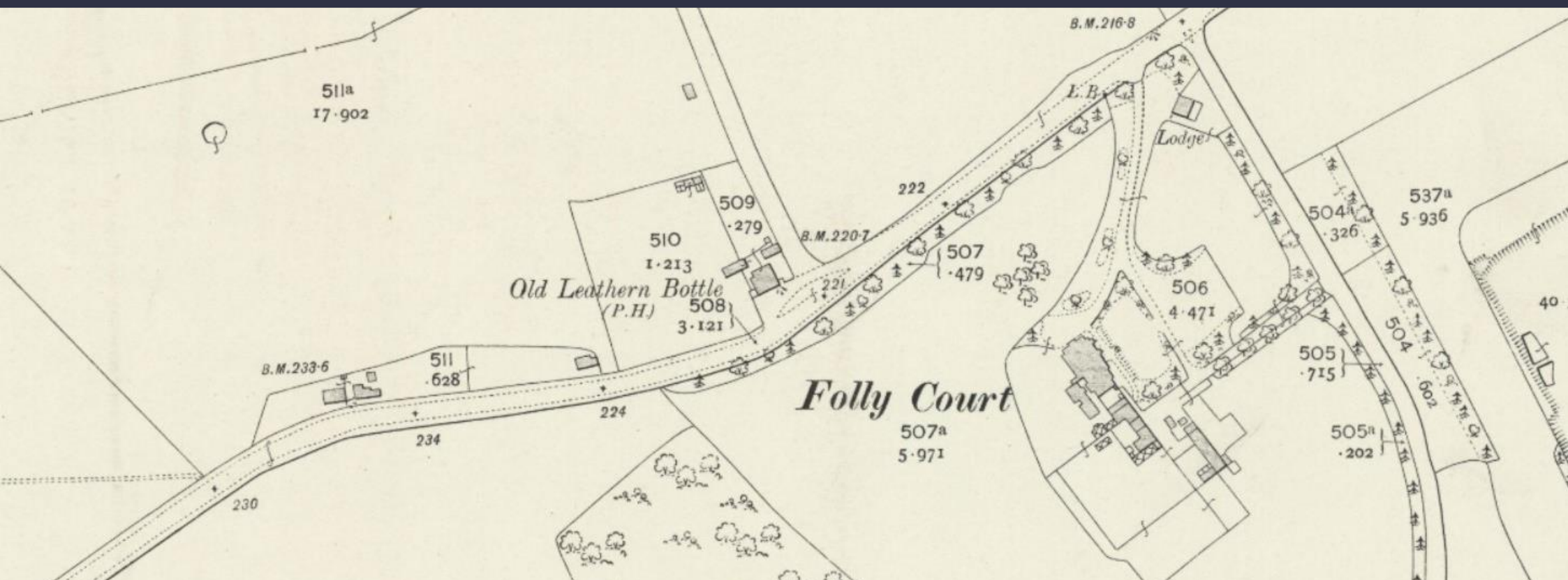
Built Heritage Statement

Ye Olde Leathern Bottel, 221 Barkham Road, Barkham, Wokingham, RG41 4BY

On behalf of Lightwood Strategic Limited

Date: October 2024 | Pegasus Ref: P23-0064

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Contents.

1. Introduction.....	4
2. Methodology.....	6
3. Site Description and Planning History.....	8
4. Policy Framework	18
5. The Historic Environment.....	19
6. Assessment of Impacts.....	24
7. Conclusions	28

Appendices contents.

Appendix 1: Assessment Methodology	29
Appendix 2: Legislative Framework.....	36
Appendix 3: National Policy Guidance	37
Appendix 4: Relevant Development Plan Policies.....	42

Plates:

Plate 1: Site Location Plan.....	4
Plate 2: Ye Olde Leathern Bottel Public House, front elevation.	8
Plate 3: The wider extent of the Public House as seen from the southwest.	8
Plate 4: Rear carpark located on Site, northwest of the main building.	9
Plate 5: 1839 Tithe Map.....	10
Plate 6: 1883 Ordnance Survey Map.....	10
Plate 7: 1911 Ordnance Survey Map.	10
Plate 8: Early-20 th century photograph.	11
Plate 9: 2003 Google Satellite Imagery.....	11
Plate 10: 2023 Google Satellite Imagery.....	12
Plate 11: Historic public house outlined in blue (18 th to early-20 th century) and later extensions outlined in yellow (post early-20 th century).....	14
Plate 12: Front (south) Elevation.....	15
Plate 13: Front elevation, featuring bay-window porch and entrance.	15
Plate 14: Evidence of alternative brickwork between the front and western side elevations.	15
Plate 15: Western elevation, including modern additions at the ground floor and earlier building fabric above, including window.....	15
Plate 16: Main building roof, predominantly clay-tiled with small section of later slate tile.....	16
Plate 17: Eastern elevation fronting onto a small overgrown garden area.	16
Plate 18: Modern single-storey rear extensions.	16
Plate 19: Central fireplace within the building, plus ceiling timbers.....	16
Plate 20: Front bar area, featuring ceiling timbers above.....	17

1. Introduction

- 1.1. Pegasus Group have been commissioned by Lightwood Strategic Limited to prepare a Built Heritage Statement to consider the proposed development at Ye Olde Leathern Bottel, 221 Barkham Road, Barkham, Wokingham RG41 4BY, as shown on the Site Location Plan provided at Plate 1.



Plate 1: Site Location Plan.

- 1.2. There are no designated heritage assets located within the bounds of the Site, nor is the Site located within a Conservation Area. In addition, there are no designated built heritage assets within the immediate environs of the Site.
- 1.3. Ye Olde Leathern Bottel is not on the Local Authority list of 'Building of Traditional Local Character', nor has it previously been identified by the Local Authority as a non-designated heritage asset. However, taking a precautionary approach, it is considered that the building may be classified by the Local Authority as such.
- 1.4. Full Planning Permission is sought for the 'Extension of existing public house to include remodelled pub/kitchen at ground floor and introduce 5 no. rooms of accommodation at first floor, with associated changes to access, parking, landscaping and other ancillary works.'
- 1.5. This Assessment provides information with regards to the significance of the built historic environment to fulfil the requirement given in paragraph 200 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".¹

¹ Department for Levelling Up, Housing and Communities (DLUHC), *National Planning Policy Framework (NPPF)* (London, December 2023), para. 200.

- 1.6. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the built historic environment, following paragraphs 205 to 209 of the *NPPF*, any harm to the built historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.
- 1.7. As required by paragraph 200 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".²

² DLUHC, *NPPF*, para. 200.

2. Methodology

- 2.1. The aims of this Report are to assess the significance of the heritage resource within the Site/study area, to assess any contribution that the Site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

- 2.2. This assessment considers built heritage matters only.

Assessment Methodology

- 2.3. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 1**. However, for clarity, this methodology has been informed by the following:

- *Criteria for Revisions/Additions to the List of Buildings of Traditional Local Character as published by Wokingham Borough Council*,³
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-*

Taking in the Historic Environment (hereafter GPA:2);⁴

- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);⁵
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter HEAN:12);⁶ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁷

Sources

- 2.4. The following key sources have been consulted as part of this assessment:

- Historic maps available online;

³ Wokingham Borough Council, *Policy for Revisions/Additions to the List of Buildings of Traditional Local Character*,

<https://wokingham.moderngov.co.uk/ieDecisionDetails.aspx?Id=431> (March 2017).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2nd edition, Swindon, July 2015).

⁵ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2nd edition, Swindon, December 2017).

⁶ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HEAN:12) (Swindon, October 2019).

⁷ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Old photographs accessible via the Historic England Architectural Red Box Collection; and
- Google Earth satellite imagery.

Site Visit

- 2.5. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 2nd May 2024, during which the site and its surrounds were assessed.

Photographs

- 2.6. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals, nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

3. Site Description and Planning History

Site Description

- 3.1. The Site comprises the built form of the Ye Olde Leathern Bottel, alongside various outdoor drinking areas, open greenspace and carpark. The building itself is one-to-two-storeys tall (plus basement), made up of various extensions and principally of red brick with clay and slate tiled roofs.
- 3.2. The Ye Olde Leathern Bottel is located on the northern side of Barkham Road (B3349), with vehicle access to the Site provided via this route. The Site is enclosed to the east, west and partially north by mature vegetation, whilst the southern boundary is open to Barkham Road. Limmerhill Road runs north / south to the east of the eastern boundaries of the Site, with this route lined with dense vegetation and mature treelines.
- 3.3. The Site's wider surrounds comprise the residential outskirts of Wokingham to the east, paddock land to the north, woods and greenspace to the south, and interspersed residential properties along Barkham Road to the west.



Plate 2: Ye Olde Leathern Bottel Public House, front elevation.



Plate 3: The wider extent of the Public House as seen from the southwest.



Plate 4: Rear carpark located on Site, northwest of the main building.

Site Development / Map Regression

- 3.4. The Ye Olde Leathern Bottel is understood to have been built during the early 18th century, although the first available evidence of its existence is in a newspaper article dated from 1789⁸.
- 3.5. The earliest source to depict the Site identified as part of this assessment is in the 1839 Tithe Map (Plate 5) and Apportionment for the parish of Wokingham. The map records a roughly rectangular building in the southern part of the Site, with attached and detached outbuildings located to the north and east of the main building. The main building roughly accords with the 'historic' elements of the building observed on site. The Apportionment refers to the building as the '*Leather Bottle Public House*', under the ownership of James Hayward Esquire and occupancy of John Griffiths. The Apportionment also identifies the small linear piece of land (Plot 427) to the west of the public house as under the same landholding. It is noted that at this date the principal (south) elevation of the public house lay immediate adjacent to the roadway to the south.
- 3.6. A slightly altered building footprint and outbuilding configuration is depicted in the 1883 Ordnance Survey Map (Plate 6), which names the Pub as the 'Old Leather Bottle'. The building's squarer footprint suggests that it may have been altered or rebuilt sometime in the late-19th century. This is shown more clearly in the 1911 Ordnance Survey (Plate 7).

⁸ The British Newspaper Archive, Reading Mercury – Monday 12 October 1789, <https://www.britishnewspaperarchive.co.uk/viewer/bl/0000367/17891012/014/0001>

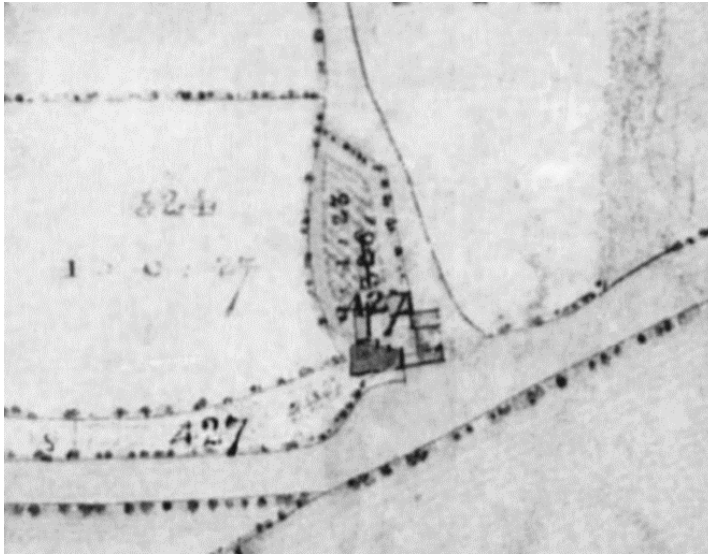


Plate 5: 1839 Tithe Map.



Plate 6: 1883 Ordnance Survey Map.

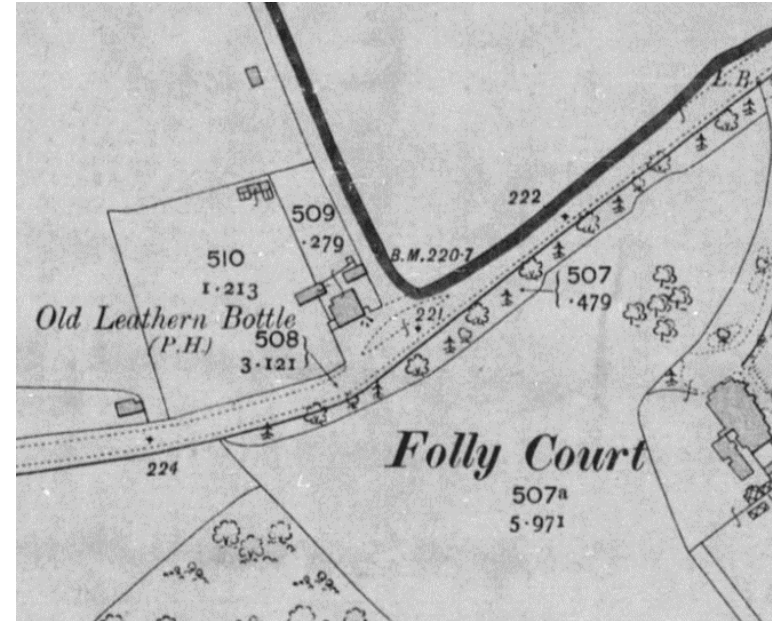


Plate 7: 1911 Ordnance Survey Map.

- 3.7. The earlier appearance of the building is depicted in an early-20th-century photograph (Plate 8). In comparison with the earlier 1911 map, the single-storey extension to the western side of the building had been partially constructed. Based on its existing appearance, the side extension is understood to have been further extended sometime in the mid to late 20th century, separate from the wider expansion made in the late-20th century. Since the photograph was taken, the two ground floor bay windows have been adjoined together to form a new front porch entrance. The doorway, and further window openings at the eastern side of the building have also been infilled. Despite these and some more recent alterations, the general appearance of the original building remains intelligible.

- 3.8. The photograph also shows the extent in which the pub's surrounds have changed, including the open area at the front which is now an enclosed drinking terrace and separate from the main road.



Plate 8: Early-20th century photograph.

- 3.9. During the late-20th century, the public house was extensively extended upon to the rear to facilitate the building's use as a modern pub/restaurant. Ultimately this saw the building double in size and the wider landholding altered greatly with the establishment of the attached carpark and various outdoor drinking areas. The earlier outbuildings shown in historic mapping are believed to have been demolished as there is little evidence to suggest that they were kept and incorporated into the current public house. With the continued growth of the building, it is likely that the interior of the original building was significantly altered to facilitate the new extensions during the 20th century.

- 3.10. Despite the extensive growth of the public house, the footprint of the original building appears to have remained relatively intact and this is evidenced by the red clay-tiled roof visible in satellite imagery. The darker slate tiled roofs are an indication of the later additions to the public house. Since 2003, the Site and overall footprint of the building has not experienced a great deal of change, only that the small garden area to the east of the building has become overgrown and further outdoor seating areas have been developed. That being said, the interior of the public house has been updated successively, as is evident by the modern fit-out.



Plate 9: 2003 Google Satellite Imagery.



Plate 10: 2023 Google Satellite Imagery.

Ye Olde Leathern Bottel – Architectural Description

- 3.11. The Public House is two-storeys tall, with additional one-storey extensions and projections at its side and rear. The building (both historic and modern element) is predominantly constructed of red brick, with the remains of a timber framed structure within the older components of the building to the south. The roof of the historic element is covered with red clay tiles, with a small section of roof on the north-east side of the building covered in slate. The modern extensions are covered with slate tiles. The differing roofing materials allow for a clear understanding of the phases of the building in aerial photographs.

- 3.12. The principal (south) elevation comprises the front elevation which faces onto a paved drinking terrace. This elevation includes a timber-framed bay window porch with a central entrance across the ground floor, and two timber-framed, eight pane hanging sash windows at the first floor. A single-storey side extension projects from the western side of the building comprising two timber-framed, 20-pane hanging sash windows. These windows are of various ages.
- 3.13. As evident by the early-20th-century photograph of the building, the two original window bays were adjoined to form the existing porch entrance, and this ultimately altered the ground floor appearance of the original building. Although, elements of the earlier fenestration are visible. The fenestration across the rest of the façade appears to be the same as photographed in the early 20th century. It is uncertain as to the extent of retained historic glazing, although a review of the timberwork and glazing would suggest a late-19th to early-20th century origin.
- 3.14. The principal façade is representative of a mid to late-19th-century re-frontage, which is evidenced by the alternative styles and ages of brickwork visible at one of the upper corners of the building (Plate 14). Despite extensions and alterations at the ground floor, the brickwork across the first floor on the western side elevation of the original building appears to be of earlier origin. This also includes one small window unit which appears to be a 19th-century addition. The extensions to the ground floor have enclosed the rest of the original elevation, likely removing historic fabric in the process (Plate 15).

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| <p>3.15. The extent of historic fabric at the rear of the original building is uncertain as it is almost entirely enclosed by modern extensions. The first-floor level is exposed, although this area of the building was neither visible nor accessible during the site inspection. It is understood that two window units are present in this location; however, their historic origins cannot be confirmed. .</p> <p>3.16. Based on the appearance of the brickwork, the eastern side of the original building appears to be more consistent in age and appearance with the front façade, although it has been subject to later alterations, including the blocking of a former doorway and window openings (Plate 16 & Plate 17).</p> <p>3.17. The majority of window units across the remainder of the building (rear/side single-storey extension) are modern, single-glazed timber casement windows or uPVC units. Such units are not considered to be of architectural or historic interest.</p> <p>3.18. Of the external elevations, the principal elevation is the best preserved and representation of the historic public house; however, it has been subject to change and is not a relic of the historic composition. The western side of the original building, despite ground-floor extensions and alterations, retains some elements of historic fabric, including the earlier, possibly original brickwork and fenestration.</p> | <p>3.19. An illustration representing the building's multi phased development is shown at Plate 11.</p> <p>3.20. The interior of the building has experienced a great deal of change with the successive modernisation and upgrade of the public house. As the building is not Listed, these works were not covered by planning controls.</p> <p>3.21. Only the ground and basement levels were reviewed during a site inspection. The only noticeable features of potential historic and/or architectural interest were the large brick fireplace at the centre of the main building, and exposed timber framing across specific ceiling areas. It was evident, however, that the ceiling timbers were machine cut, which suggests they form part of a later phase of development within the original building. As part of the modern fit-out of the restaurant/pub, old hand-cut timbers have been incorporated into the décor of the building, and this includes the modern extensions. These are not considered to form part of the original or earlier fabric of the historic public house and are not of heritage value.</p> |
|--|--|



Plate 11: Historic public house outlined in blue (18th to early-20th century) and later extensions outlined in yellow (post early-20th century).



Plate 12: Front (south) Elevation.



Plate 14: Evidence of alternative brickwork between the front and western side elevations.



Plate 13: Front elevation, featuring bay-window porch and entrance.



Plate 15: Western elevation, including modern additions at the ground floor and earlier building fabric above, including window.



Plate 16: Main building roof, predominantly clay-tiled with small section of later slate tile.



Plate 18: Modern single-storey rear extensions.



Plate 17: Eastern elevation fronting onto a small overgrown garden area.



Plate 19: Central fireplace within the building, plus ceiling timbers.



Plate 20: Front bar area, featuring ceiling timbers above.

Planning History

The Site

- 3.22. In August 2024 Planning Permission was refused for *'extension to the existing public house to include remodelled pub/kitchen at ground floor, loss of staff accommodation, and introduction of 5 no. rooms of accommodation at first floor. Additionally, the erection of an ancillary building to provide a further 8 no. rooms; together with associated changes to access, parking, landscaping and other ancillary works'* (LPA Ref. 241556).
- 3.23. Potential impacts on the historic environment did not form a reason for refusal, nor were concerns regarding the heritage significance of the Ye Olde Leathern Bottel realised within the Officer Report.

Beyond the Site

- 3.24. In August 2023, Outline Planning Permission was refused for the redevelopment of the land to the north of the Site (LPA Ref. 232621). Potential impacts on the historic environment did not form a reason for refusal, nor were concerns regarding the heritage significance of the Ye Olde Leathern Bottel realised within the Officer Report.

4. Policy Framework

Legislation

- 4.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.⁹
- 4.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.¹⁰
- 4.3. Full details of the relevant legislation are provided in **Appendix 2**.

National Planning Policy Guidance

- 4.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework (NPPF)*, an updated version of which was published in December

2023. The *NPPF* is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.¹¹ The *PPG* also contains the *National Design Guide*.¹²

- 4.5. Full details of the relevant national policy guidance are provided within **Appendix 3**.

The Development Plan

- 4.6. Applications for Planning Permission are currently considered against the policy and guidance set out within the *Wokingham Borough Development Plan: Managing Development Delivery Local Plan* (February 2024).
- 4.7. Details of the policy specific relevant to the application proposals are provided within **Appendix 4**.

⁹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

¹⁰ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹¹ Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹² Department for Levelling Up, Housing and Communities (DLUHC), *National Design Guide* (London, January 2021).

5. The Historic Environment

- 5.1. As set out in **Section 1**, there are no designated heritage assets located within the bounds of the Site, nor is the Site located within a Conservation Area. In addition, there are no designated built heritage assets within the immediate environs of the Site.
- 5.2. Ye Olde Leathern Bottel is not on the Local Authority list of '*Building of Traditional Local Character*', nor has it previously been identified by the Local Authority. However, taking a precautionary approach, it is considered that the building may be classified by the Local Authority as such.
- 5.3. The following Section will provide an assessment of the heritage significance of the Ye Olde Leathern Bottel, including reference to *Criteria for Revisions/Additions to the List of Buildings of Traditional Local Character* published by Wokingham Borough Council.
- 5.4. With regards to other heritage assets within the surrounds of the site, Step 1 of the methodology recommended by GPA3 (see methodology), is to identify which heritage assets might be affected by a proposed development.¹³
- 5.5. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.
- 5.6. It is however widely accepted (paragraph 213 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.¹⁴ In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.
- 5.7. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.
- 5.8. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 5.9. The nearest designated heritage asset to the Site is the Grade II Listed Folly Farm, located c.215m to the east.
- 5.10. Assessment has concluded that the Site does not form part of the 'setting' of this asset, or others within the wider environs, that positively contributes to their overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is

¹³ Historic England, *GPA*:3, p. 4.

¹⁴ *DLUHC, NPPF*, para. 213.

not anticipated to result in a change that would impact upon the overall heritage significance of these assets. Other heritage assets have therefore been excluded from further assessment within this Report.

Ye Olde Leathern Bottel

- 5.11. The following assessment will first consider the *Criteria for Revisions/Additions to the List of Buildings of Traditional Local Character* published by Wokingham Borough Council, based upon which a subsequent assessment on the overall architectural and historic interest of the building will be made, as per the Town and Country Planning Act 1999.

Age

- 5.12. With regard to the date of a structure and the influence that this may have on its importance, the *Policy for Revisions/Additions to the List of Buildings of Traditional Local Character* states:

“The age of a building may be an important criterion and the age range can be adjusted to take into account distinctive local characteristics.”

- 5.13. As discussed, the Ye Olde Leathern Bottel was constructed during the early to mid-18th century and was one of the earlier buildings to have been built in the immediate area. The building was likely altered or rebuilt sometime during the mid to late 19th century. It has operated as a public house since its construction, although in more recent years the building and wider property has been variously extended and altered in order to facilitate its use as a modern pub/restaurant.

- 5.14. Overall, the building is of a significant age in context with the local area and is therefore considered to make a moderate contribution to its historic and architectural interests.

Rarity

- 5.15. With regard to the rarity of a structure the Policy provides the following description:

“Appropriate for all buildings, as judged against local characteristics.”

- 5.16. As stated, the Ye olde Leathern Bottel was one of the earlier buildings to have been built in the immediate area and is in fact one of few buildings of its age to have survived.
- 5.17. The rarity of its fabric and overall structure has been partially diminished by later alterations during the 19th century and extensions in the 20th century. As such, the appreciation of its rarity has been somewhat lost, and this has reduced the value that can be attributed to this criterion.

- 5.18. Overall, the building’s rarity is considered to make a low contribution to the asset’s special interests.

Aesthetic value

- 5.19. With regards to the aesthetic merits of a building, the Policy states:

“The intrinsic design value of a building relating to local styles, materials or any other distinctive local characteristics.”

5.20. The intrinsic design of the Ye Olde Leathern Bottel is simple in its appearance, and this is likely what was originally intended when it was constructed and rebuilt during the 19th century. This is not to say that the building lacks in aesthetic value, its use of local styles and materials is evident in its brickwork, window units and overall form.

5.21. However, such styles do not require a great deal of technical craftsmanship, which is why the overall aesthetic value of the building is considered low.

Group value

5.22. The Policy describes 'Group value' as follows:

"Groupings of buildings with a clear visual, design or historic relationship."

5.23. Having reviewed the map regression of the Ye Olde Leathern Bottel, the public house appears to have been originally constructed in isolation, which it has generally maintained overtime. Therefore, there are no buildings within the wider surrounds which are considered to share group value with the Site.

Evidential value

5.24. With regard to a structure's evidential value, the Policy states:

"The significance of a local building of any kind may be enhanced by a significant contemporary or historic written record."

5.25. Available records associated to the Ye Olde Leathern Bottel include old newspaper articles, which have helped date the building to the 18th century. The earliest record in a newspaper was in 1789, however other online sources have suggested the public house originates from 1737, though the source origins of this date is uncertain.

5.26. Other documentary sources of the public house include historic maps, as well as the Tithe apportionment. The details of which are included in **Section 3**.

5.27. It is recognised that the Ye Olde Leathern Bottel has operated under several different names in its time, and this is represented by the documentary evidence. The moderate evidential value of the public house is considered to make a positive contribution to its historic interests.

Historic association

5.28. The Policy regards a structure's historical associations as follows:

"The significance of a local building of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures."

5.29. There is no available evidence which associates the public house with any important local figures or other events of note which may contribute to its significance.

5.30. The only other element to note, is that as an historic roadside alehouse, of which it still remains today, the building derives some historic association as having served the local and visiting community of Wokingham

and Barkham for more than two centuries. As such the value attributed to the asset's historic associations is considered low.

Archaeological interest

- 5.31. With regard to a structure's archaeological interest, the Policy states:

"This may be an appropriate reason to designate a locally significant building on the grounds of archaeological interest if the evidence base is sufficiently compelling and if a distinct area can be identified."

- 5.32. There is little evidence to associate any archaeological interest to the building. Furthermore, the surrounding grounds of the public house have changed significantly overtime and have been modernised with additional hardstanding. Therefore, the archaeological interest of the Site is considered low.

Designed landscapes

- 5.33. With regards to designed landscapes, the policy states:

"Relating to the interest attached to locally important designed landscapes, parks and gardens."

- 5.34. There is no evidence which associates the public house with any locally important designed landscaped, parks or gardens.

Landmark status

- 5.35. In terms of a building's landmark status, the Policy states as follows:

"A building with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene."

- 5.36. Whilst it may not be recognised for any particular aesthetic value, the roadside public house has served the local and visiting community for more than two centuries, providing a strong sense of communal and social value. Prominently located and in an isolated position, the Ye Olde Leathern Bottel is considered to derive some landmark status.

Social and communal value

- 5.37. The Policy regards social and communal value as follows:

"Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence; often residing in intangible aspects of heritage contributing to the "collective memory" of a place."

- 5.38. As already discussed, the Ye Olde Leathern Bottel has for over two centuries served the local and travelling community as a roadside public house. Therefore, the building is considered to have a high social and communal value, which makes a positive contribution to its overall heritage significance.

Statement of Significance

- 5.39. This assessment has used the *Criteria for Revisions/Additions to the List of Buildings of Traditional Local Character* published by Wokingham Borough Council, other industry guidance and professional judgement, as a method of establishing the special interests and overall heritage significance of Ye Olde Leathern Bottel.
- 5.40. The Ye Olde Leathern Bottel Public House is considered to be of some heritage significance. This is principally embodied in its external physical fabric, which derives historic and architectural interests, as an 18th-century roadside public house which was successively altered throughout the 19th and 20th centuries. Historic interest is also derived from the asset's social and communal value, which also gives it some landmark status.
- 5.41. Stylistically, the surviving architectural detailing of the original building is characteristic of the early-mid Victorian period and reflects the presumed time of reconstruction derived from the map regression. However, that is not to say that fabric and architectural detailing from the earlier 18th-century building survive within its central core. The principal elevation is the best preserved and representation of the historic public house, making the greatest contribution to the overall significance of the asset. The western and eastern sides of the original building are also of some significance. However, recent modifications and extensions has removed a high level of historic fabric and altered the original form and layout of the building, thus diminishing the overall historic value.
- 5.42. The internal layout of the original building is considered to make a lesser contribution to the overall heritage significance of the asset. Whilst the general hierarchy and use of the various floors can be understood (i.e., main bar areas on the ground floor with residential letting above), it is clear that the layout has been subject to significant alteration. Where architectural details survive internally (see above), these contribute to the significance of the building, although again less than the external envelope.
- 5.43. Accordingly, it is considered likely that the Ye Olde Leathern Bottel Public House will be identified by the Local Authority as a non-designated heritage asset and has the potential to of sufficient interest to warrant classification as a *Buildings of Traditional Local Character*.
- 5.44. Whilst there is currently no statutory protection for the setting of non-designated heritage assets, it is evident that elements of the building's surrounds make some contribution to its significance, albeit less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "setting") which are considered to contribute to its heritage significance include the surrounding grounds and ancillary spaces attached to the pub, approaches along Barkham Road, plus the rural land to the north which forms part of the historical backdrop of the public house.

6. Assessment of Impacts

- 6.1. Full Planning Permission is sought for the ‘*Extension of existing public house to include remodelled pub/kitchen at ground floor and introduce 5 no. rooms of accommodation at first floor, with associated changes to access, parking, landscaping and other ancillary works.*’
- 6.2. The proposed works comprise the following elements:
- Internal reconfiguration of ground floor of public house to allow for enhanced pub & dining/kitchen layout;
 - Upwards extension and internal reconfiguration to provide 5 no. double rooms, with ensuite bathrooms, at first floor for overnight guests;
 - Amended access from Barkham Road to improve visibility; and
 - Associated changes to car parking and landscaping.
- 6.3. The *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.

- 6.4. With regard to non-designated heritage assets, potential harm should be considered within the context of Paragraph 209 of the *NPPF*.¹⁵ There is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset.
- 6.5. High Court Judgements have confirmed that when considering potential impacts on non-designated heritage assets within the decision-making process, the balanced judgement required is different from the public benefits exercise associated with designated heritage assets (as set out in Paragraphs 207 and 208 of the *NPPF*).¹⁶
- 6.6. Within a High Court Judgment of 2017, Jarman HHJ confirmed that the only requirement of the *NPPF* in respect of non-designated heritage assets is “*that the effect of an application on the significance should be taken into account*”.¹⁷
- 6.7. This was further expressed in the Bohm decision, which stated that:
- [34] “Unsurprisingly, given that an NDHA [non-designated heritage asset] does not itself have statutory protection, the test in para 135 [Paragraph 209 of the 2023 NPPF] is different from that in paras**

¹⁵ DLUHC, *NPPF*, para.209.

¹⁶ DLUHC, *NPPF*, paras. 207 and 208.

¹⁷ Travis Perkins (Properties) Limited v Westminster City Council [2017] EWHC 2738 (Admin), Paragraph 44.

132–4 [Paragraphs 206–208 of the 2023 NPPF], *which concern designated heritage assets. Paragraph 135* [Paragraph 209 of the 2023 NPPF] *calls for weighing “applications” that affect an NDHA, in other words the consideration under that paragraph must be of the application as a whole, not merely the demolition but also the construction of the new building. It then requires a balanced judgement to be made by the decision maker. The NPPF does not seek to prescribe how that balance should be undertaken, or what weight should be given to any particular matter.*¹⁸

- 6.8. As discussed in **Section 5**, heritage significance of the Ye Olde Leathern Bottel is principally derived from the architectural and historic interest of the external envelope of the original building.
- 6.9. The interior of the original public house makes a lesser contribution to the significance of the asset due to the level of change that has occurred.
- 6.10. Whilst there is currently no statutory protection for the setting of non-designated heritage assets, it is evident that elements of the building’s surrounds make some contribution to its significance, albeit less than that derived from its historic fabric. Principal elements which are subject to change from the proposals include the surrounding grounds and ancillary spaces attached to the pub.

Single-storey extension and other physical works

- 6.11. The proposed physical changes to Ye Olde Leathern Bottel remain as proposed under LPA Ref. 241556. In this regard, it is highlighted that impacts on the historic environment did not form a reason for refusal for said application, nor were concerns regarding the heritage significance of the Ye Olde Leathern Bottel realised within the Officer Report.
- 6.12. The proposed first floor extension is located to the north of the historic element of the building, above the modern ground-floor restaurant area. The new extension and original building will be connected via a narrow link, so as to visually separate the original building from the new extension, of which will maintain a lower ridge height. By way of extending an existing opening, the proposals have sought to minimise physical changes to historic fabric. This resulting loss of historic fabric will cause harm, however, when considered within the context of the overall significance of the building, this harm is considered to be limited, at most.
- 6.13. The upwards extension of the modern rear extension has been designed to be subservient to the principal building. This is evident by the choice of location and materiality, with the use of terracotta brick, slate tiled roof and timber-framed windows. By way of being located to the rear of the building, and on an elevation of lesser interest, the extension would not be visible in conjunction with the principal elevation of the asset, in particular from Barkham Road. Where visible from within the Site, the

¹⁸ Bohm [2017] EWHC 3217 (Admin).

extension would be viewed as a later introduction to the building (as represented by the slate-tiled roof), within an area that has already been subject to change and would not alter the understanding of the building as an 18th-century public house with multiple phases of later development. Additional contemporary elements including the proposed roof lights and steel balustraded balcony will again not be viewed in conjunction with the principal elevation of the asset.

- 6.14. Two heritage style roof lights are to be installed on the eastern side of the main building. As discussed earlier, this section of the roof comprises a more recent replacement slate-tiled finish and the fabric beneath may also be more recent. These windows will open above the bar area at the ground floor, an area which is recognised as having modern building timbers present within the ceiling. Creating the new roof openings will result in the loss of modern fabric, thus having no negative impact to the heritage significance.
- 6.15. The internal changes to the ground floor layout are limited to the later areas of the building and exclude the original pub building. Further alterations are focussed at the first floor, where the internal layout will be altered to facilitate 3 no. ensuite bedrooms. It is reiterated that the identification of the Ye Olde Leathern Bottel as a non-designated heritage asset does not impose any planning or legal restrictions on internal works. Accordingly, it is highlighted that unless Planning Permission is required (for example in association with a change of use), that the interior of the property could be subject to change without the need to consult the Local Authority.

- 6.16. Overall, the proposed physical changes to the Ye Olde Leathern Bottel are considered to have only a minor impact on the overall heritage significance of the building. It is also highlighted that the works proposed are associated with securing a long-term future for the building, and in particular the understanding and experience of the external envelope as viewed from Barkham Road.

Changes Within the Site

- 6.17. Changes within the wider Site can be summarised as the changes to the existing access and routeways through the Site, the creation of additional car parking and general relandscaping. The design of these elements of the scheme have been informed by the responses received in regard to LPA Ref. 241556.
- 6.18. The access route proposed as part of this application is consistent with that proposed for the recently refused application for residential development to the north – see **Section 3**. The two proposals have been kept consistent with each other should both come forward now or in the future.
- 6.19. The proposed development will result in a minor change in appearance of the immediate surrounds of the public house. That being said, the proposals seek to alter an area which was established in the 20th century and is in no way a representation of the asset's historic surrounds and therefore heritage significance. The scheme has, been designed to minimise potential impacts which may arise in how the asset is experienced and appreciated from within the Site and Barkham Road.

- 6.20. A new amenity, access and landscaping scheme is proposed alongside the new development. Whilst this may alter the appearance of the building's immediate surrounds, it is reiterated that this area has already been extensively altered overtime. There will be an increase in hardstanding as a result of the new access opening and road through the Site, as well as a new carpark. This will result in a small loss of the existing garden area to the southwest corner of the Site, which will have some negative impact to the verdant setting of the non-designated heritage asset. However, this will be partially mitigated by the introduction of new tree and hedge planting within the Site, principally around the new road entrance and internal hardstanding.
- 6.21. Therefore, considering the current characterisation of the modern-day carpark and pub grounds, the proposed development is not expected to cause any harm to the heritage significance of the asset, through a change in setting.

7. Conclusions

- 7.1. Pegasus Group have been commissioned by Lightwood Strategic Limited to prepare a Built Heritage Statement to consider the proposed development at Ye Olde Leathern Bottel, 221 Barkham Road, Barkham, Wokingham RG41 4BY.
- 7.2. There are no designated heritage assets located within the bounds of the Site, nor is the Site located within a Conservation Area. In addition, there are no designated built heritage assets within the immediate environs of the Site. Whilst it has not been identified as a locally listed building, the Ye Olde Leathern Bottel has, however, a degree of heritage significance and could be considered as a non-designated heritage asset.
- 7.3. This application seeks Full Planning Permission for the *'Extension of existing public house to include remodelled pub/kitchen at ground floor and introduce 5 no. rooms of accommodation at first floor, with associated changes to access, parking, landscaping and other ancillary works.'*
- 7.4. Overall, it is concluded that the proposed physical changes to the Ye Olde Leathern Bottel would result in a minor degree of harm to its overall heritage significance. The level of harm has, however, been partially minimised by virtue of an informed design approach which responds to the vernacular of the building and surrounding area; and securing a long-term future for the building. The minor level of harm identified should be considered in a balanced judgement alongside the scheme as a whole, as per Paragraph 209 of the NPPF.
- 7.5. It is highlighted that proposed physical changes to Ye Olde Leathern Bottel remain as proposed under LPA Ref. 241556, and that impacts on the building did not form a reason for the refusal of said application, nor were concerns regarding the heritage significance of the Ye Olde Leathern Bottel realised within the Officer Report.
- 7.6. The wider development of the Site will result in no harm to the asset's overall heritage significance, through a change in setting.

Appendix 1: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”¹⁹

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²⁰

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.²¹ These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²²

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** *As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective

¹⁹ DLUHC, *NPPF*, Annex 2.

²⁰ Historic England, *GPA:2*.

²¹ Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

²² DLUHC, *NPPF*, Annex 2; DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

experience of a place and can symbolise wider values such as faith and cultural identity.²³

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁴

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²⁵

Setting is defined 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.”²⁶

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.²⁷

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

²³ DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

²⁴ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

²⁵ DLUHC, *NPPF*, Annex 2.

²⁶ DLUHC, *NPPF*, Annex 2.

²⁷ Historic England, *GPA:3*, pp. 8, 11.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may

include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”²⁸

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 206 of the *NPPF*, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 72 of the *NPPF*;²⁹
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 206 of the *NPPF*, comprising Grade II Listed Buildings and

²⁸ *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, paras. 25 and 26.

²⁹ *DLUHC, NPPF*, para. 206 and fn. 72.

Grade II Registered Parks and Gardens (and also some Conservation Areas),³⁰ and

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *“buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”*.³¹

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

In order to test the acceptability of the scheme against guidance and policy, Ye Olde Leathern Bottel will be first assessed against the criteria used by Wokingham Borough Council when deciding whether a building is of traditional local character and whether it should be added to *‘The List’*. Although this report will not be assessing whether the building is suitable for local listing, the criteria provide a useful guide in assessing the significance of the application site, nonetheless.

The criteria is set out as follows:

- Age
- Rarity
- Aesthetic value

- Group Value
- Evidential value
- Historical association
- Archaeological interest
- Designed landscapes
- Landmark status
- Social and communal value

Again, although the site does not comprise a Building of Traditional Local Character, nor is it being considered as such, these criteria provide a useful guide in understanding the significance of the building

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighing exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be

³⁰ DLUHC, *NPPF*, para. 206.

³¹ DLUHC, *PPG*, paragraph 039, reference ID: 18a-039-20190723.

harm that would “have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”,³² and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

“Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”³³

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, “preserving” means doing “no harm”.³⁴

Preservation does not mean no change, it specifically means no harm. GPA:2 states that “Change to heritage assets is inevitable but it is only harmful when significance is damaged”.³⁵ Thus, change is accepted in Historic England’s guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in GPA:3, described above. Fundamental to this methodology is a consideration of “what matters and why”.³⁶ Of particular relevance is the checklist given on page 13 of GPA:3.³⁷

It should be noted that this key document also states:

“Setting is not itself a heritage asset, nor a heritage designation...”³⁸

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

³² Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³³ DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

³⁴ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

³⁵ Historic England, GPA:2, p. 9.

³⁶ Historic England, GPA:3, p. 8.

³⁷ Historic England, GPA:3, p. 13.

³⁸ Historic England, GPA:3, p. 4.

With regards to changes in setting, GPA:3 states that:

“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.³⁹

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴⁰

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 3**, the NPPF (at Paragraphs 207 and 208) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴¹

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 207 to 209.⁴²

The PPG provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from

enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.”⁴³***

³⁹ Historic England, GPA 3., p. 8.

⁴⁰ Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

⁴¹ DLUHC, NPPF, paras. 207 and 208.

⁴² Including – Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); DLUHC, NPPF, paras. 207 and 209.

⁴³ DLUHC, PPG, paragraph 020, reference ID: 18a-020-20190723.



Any "*heritage benefits*" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁴⁴ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

No Listed Buildings or Conservation Areas have been identified as being sensitive to the proposals.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁴⁵

⁴⁴ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁴⁵ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 3: National Policy Guidance

The National Planning Policy Framework (December 2023)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2023. This replaced and updated the previous *NPPF* (September 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***

For decision-taking this means:

- a. approving development proposals that accord with an up-to-date development plan without delay; or***
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
 - i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or***
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”⁴⁶***

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change.”⁴⁷ (our emphasis)

The NPPF continues to recognise that the planning system is planned and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”⁴⁸

⁴⁶ DLUHC, NPPF, para. 11.

⁴⁷ DLUHC, NPPF, para. 11, fn. 7.

⁴⁸ DLUHC, NPPF, Annex 2.

The NPPF goes on to define a Designated Heritage Asset as a:

“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”⁴⁹

As set out above, significance is also defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”⁵⁰

Section 16 of the NPPF relates to ‘Conserving and enhancing the historic environment’ and states at paragraph 201 that:

“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.”⁵¹

⁴⁹ DLUHC, NPPF, Annex 2.

⁵⁰ DLUHC, NPPF, Annex 2.

Paragraph 203 goes on to state that:

“In determining planning applications, local planning authorities should take account of:

- 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.”⁵²***

With regards to non-designated heritage assets, paragraph 209 of 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

⁵¹ DLUHC, NPPF, para. 201.

⁵² DLUHC, NPPF, para. 203.

be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁵³

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

“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.”⁵⁴

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, 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. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even

⁵³ DLUHC, NPPF, para. 209.

⁵⁴ DLUHC, PPG, paragraph 007, reference ID: 18a-007-20190723.

minor works have the potential to cause substantial harm.⁵⁵ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape."⁵⁶

"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."⁵⁷

It goes on to state that:

"Well-designed places and buildings are influenced positively by:

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***

- ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
- ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.***

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."⁵⁸

⁵⁵ DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁵⁶ DLUHC, NDG, para. 46.

⁵⁷ DLUHC, NDG, para. 47.

⁵⁸ DLUHC, NDG, paras. 48–49.

Appendix 4: Relevant Development Plan Policies

Applications for Planning Permission are currently considered against the policy and guidance set out within the *Wokingham Borough Development Plan: Managing Development Delivery Local Plan* (February 2014).

Policy TB26 pertains to Buildings of Traditional Local Character and Areas of Special Character, stating as follows:

“Policy TB26: Buildings of Traditional Local Character and Areas of Special Character

1. Areas of Special Character are shown on the Policies Map.

2. Planning permission will only be granted for proposals to or affecting Buildings of Traditional Local Character and Areas of Special Character where they demonstrate that they retain and enhance the traditional, historical, local and special character of the building or area and its setting.

3. Proposals that involve the demolition of a Building of Traditional Local Character will require strong justification.”

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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