

**68-70 Peach Street  
Wokingham  
Berkshire  
RG40 1XH**

**An  
Heritage Impact Assessment  
on  
Proposed Development**

**Text**

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*Summary*

*Plans have been to convert the upper floor of a 1960's era backland range in the centre of Wokingham into two residential apartments. The only proposed exterior changes to the building are in the form of additional windows. The building is not a heritage asset although there are some such assets in the vicinity and it is within the conservation area. Consequently, this Consultancy was commissioned, under the guidelines of the National Planning Policy Framework, to assess the potential impact of the proposals on the character, setting and significance of any adjacent heritage assets including the conservation area. It is clear that these minimal changes to a building of no heritage value will result in no harm to the character or significance of any adjacent designated or non-designated heritage assets, including the conservation area. Therefore neither Sections 66 or 72 of the 1990 Planning Act nor Paragraphs 214-216 of the NPPF would be engaged.*

## **1. Introduction**

Plans have been developed to convert the upper floor of a modern backland building in the centre of Wokingham into residential apartments. The site is within the boundary of the conservation area and there are also several listed buildings nearby and others that could be considered to be non-designated heritage assets.

Consequently, this Consultancy was commissioned to undertake a suitably detailed heritage impact assessment of the proposals on any adjacent designated or non-designated heritage assets in order to comply with the guidelines of the revised National Planning Policy Framework. It is not concerned with any other planning matters.



Fig.1: Location Plan.

## 2. Planning Policies

### 2.1 The National Planning Policy Framework

Planning law relating to listed buildings and conservation areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 16(2-3) of the Act states that:

*(2) In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

*(3) Any listed building consent shall (except in so far as it otherwise provides) enure for the benefit of the building and of all persons for the time being interested in it.*

Section 66 of the Act deals with the responsibilities of local planning authorities – the decision makers - when dealing with planning applications that could impact on heritage assets and in virtually repeating Section 16(2) states that:

*‘In considering whether to grant planning permission for development or permission in principle which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.<sup>1</sup>*

Section 72 of the same Act states that, in relation to conservation areas:

*‘with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.<sup>2</sup>*

In March 2012 the *National Planning Policy Framework* (NPPF) replaced all other separate *Planning Policy Guidelines* and *Planning Policy Statements*.<sup>3</sup> Revised versions were published in July 2018, February 2019, July 2021, September 2023, December 2023 and December 2024.<sup>4</sup> The glossary of the NPPF described ‘heritage assets’:

*‘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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).’*

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<sup>1</sup> Planning (Listed Buildings and Conservation Areas) Act 1990 c.9 section 66 (1), 41

<sup>2</sup> *Ibid.* section 72

<sup>3</sup> Department for Communities & Local Government, 2012, *National Planning Policy Framework*.

<sup>4</sup> Department for Levelling Up, Housing and Communities, 2023, *National Planning Policy Framework*.

The main relevant paragraphs in the NPPF reiterate the sections of the 1990 Planning Act. Paragraph 207 states that:

*‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.*

Paragraph 208 states 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’.*

### **3. Heritage Impact Assessments**

#### **3.1 General Introduction**

The purpose of a heritage impact assessment (HIA) is to meet the relevant guidance given in the NPPF. This outlines the need to inform the planning decisions when considering proposals that have the potential to have some impact on the character or setting of a heritage asset. It is not concerned with other planning issues.

The nature of the heritage assets and the potential impact upon them through development are both very varied. The heritage assets include both designated heritage assets – such as listed buildings, scheduled ancient monuments and conservation area – and non-designated heritage assets, a rather uncomfortable and sometimes subjective category that includes locally listed buildings, field systems, buried archaeological remains and views.

The degree of impact a development could have on such assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views. Under the requirements of the NPPF and of other useful relevant guidance, such as English Heritage’s *Conservation Principles* and *Informed Conservation*, and recent material from the newly formed Historic England, the process of heritage impact assessments can be summarised as involving three parts.

These are:

1. understanding the heritage values and significance of the designated and non-designated heritage assets involved and their settings;
2. understanding the nature and extent of the proposed developments;
3. making an objective judgement on the impact that the proposals outlined in Part 2 may have on the information outlined in Part 1.<sup>5</sup>

### 3.2 Definition of Setting

Setting, as a concept, was clearly defined in PPS5 and was then restated in the NPPF which describe it 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.’*

The latest version of the Historic England guidance on what constitutes setting is virtually identical to the former English Heritage guidance:

*‘Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.’<sup>6</sup>*

The new Historic England guidance also re-states the earlier guidance that setting is not confined entirely to visible elements and views but includes other aspects including environmental considerations and historical relationships between assets:

*‘The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance’.<sup>7</sup>*

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<sup>5</sup> English Heritage, 2008, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*; Clark, K, 2001, *Informed Conservation*

<sup>6</sup> Historic England, 2017, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning*: 3 (2<sup>nd</sup> ed.), para.9

<sup>7</sup> *Op.cit.*, Part 1, reiterating guidance in the PPG of the NPPF.

In terms of the setting of heritage assets the approach is the same but the latest Historic England guidance - *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3* (GPA3) of 2017 - suggests a five-step approach.<sup>8</sup> The steps are:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

### 3.3 Definition of Significance

The glossary of the *Planning Practice Guidance* (PPG) to the NPPF defines significance 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’.*

These are further explained as:

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

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<sup>8</sup> *Op.cit.*, para.19

The PPG also states that:

*‘Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as ‘locally listed’’.<sup>9</sup>*

but cautions that:

*‘A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process’.<sup>10</sup>*

### **3.4 Definition of Harm**

Current guidance by Historic England is that ‘change’ does not equate to ‘harm’. The NPPF and its accompanying PPG effectively distinguish between two degrees of harm to heritage assets – *substantial* and *less than substantial*. Paragraph 214 of the revised NPPF states that:

*‘Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss 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 use of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term 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’.<sup>11</sup>*

Paragraph 215 of the revised NPPF states that:

*‘Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposals including, where appropriate, securing its optimum viable use’.*

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<sup>9</sup> Planning Practice Guidance, 2014, paragraph 39

<sup>10</sup> *Ibid.*

<sup>11</sup> Ministry of Housing, Communities & Local Government, *op. cit.*, para.214

Paragraph 216 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 be required having regard to the scale of any harm or loss and the significance of the heritage asset.’*

Recent High Court rulings have emphasised the primacy of the 1990 Planning Act – and the fact that it is up to the decision makers in the planning system to *‘have special regard to the desirability of preserving the [listed] building or its setting’*. As stated by HH Judge David Cooke in a judgment of 22 September 2015 regarding impact on the setting of a listed building:

*‘It is still plainly the case that it is for the decision taker to assess the nature and degree of harm caused, and in the case of harm to setting rather than directly to a listed building itself, the degree to which the impact on the setting affects the reasons why it is listed.’*

The judgment was endorsed by Lord Justice Lewison at the Court of Appeal, who stated that:

*‘It is also clear as a matter both of law and planning policy that harm (if it exists) is to be measured against both the scale of the harm and the significance of the heritage asset. Although the statutory duty requires special regard to 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’.*<sup>12</sup>

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<sup>12</sup> Court of Appeal (PALMER and HEREFORDSHIRE COUNCIL & ANR) in 2016 (Case No: C1/2015/3383)

#### 4. Setting & Outline History

The proposed development site lies in the historic core of Wokingham, in a backland area between two of its principal streets – Peach Street to the south and Rose Street to the north. Wokingham lies above the flood plain of the Emmsbrook on the edge of the Thames basin a few miles from the now much larger town of Reading. Historically it was within the extensive parish of Sonning.

The name is of Saxon origin but earlier settlement on the site seems likely. The present name is derived from the Old English and probably means ‘the settlement of Wocca’s people’. Presumably originally an agricultural village it had grown sufficiently in significance by the start of the 13<sup>th</sup> century to have its own market. The Market Place and Rose Street are both mentioned in a deed of 1219.

The linear layout of the town – with the Market Place at the south-western end and the church at the north-eastern end linked by the parallel Rose Street and Peach Street – has a distinct suggestion of a deliberately planned mediaeval extension of an existing settlement. Such planning and the granting of markets and fairs were largely undertaken to boost the income of the landowner through rents and market tolls.

The town appears to have been prosperous as a market town until the mid-19<sup>th</sup> century, and as well as the typically associated industries of such a town also had silk mills and maltings. The opening of the railways in the second quarter of the 19<sup>th</sup> century led to the expansion of the town and further industrial and commercial development, although its historic core and plan form survived.



Fig.2: Extract from the 1<sup>st</sup> edition 1:2500 Ordnance Survey map surveyed in 1870.



Fig.3: Extract from the 1898 revision of the 1:2500 OS Map.



Fig.4: Extract from the 1931 revision of the 1:2500 OS Map.

However, much of the town centre has been redeveloped – and especially in the 1960's. This particularly impacted Peach Street, most of the north side of which was rebuilt at that time in a style that the *Conservation Area Appraisal* euphemistically states '*reflect[s] the design trends of the time*'. The building that is the subject of this planning application and heritage impact assessment is a part of that wholesale redevelopment of the north side of Peach Street.



Fig.5: GoogleEarth © view of the centre of Wokingham, study area arrowed.

## 5. Description

The building lies to the rear of the 1960's parade of shops along Peach Street and immediately to the south of the slightly later and much larger 'U-shaped' development to the north-east. To the south is a large car-parking and service yard and to the north-west, the rear gardens of properties along the south side of Rose Street.

The building is a detached tall but only two-storey commercial building, rectangular in shape, presumably of concrete-frame construction but largely faced, in between concrete uprights and a broad concrete band at first-floor level, in machine-made brick laid to a stretcher bond. Apart from vehicular and pedestrian access doorways at the south-western corner the ground floor is largely devoid of openings.

The fenestration on the first floor is erratic with no obvious attempt at symmetry. The roof is flat. Overall it is a large, plain and utilitarian structure lacking any architectural quality or historic interest.



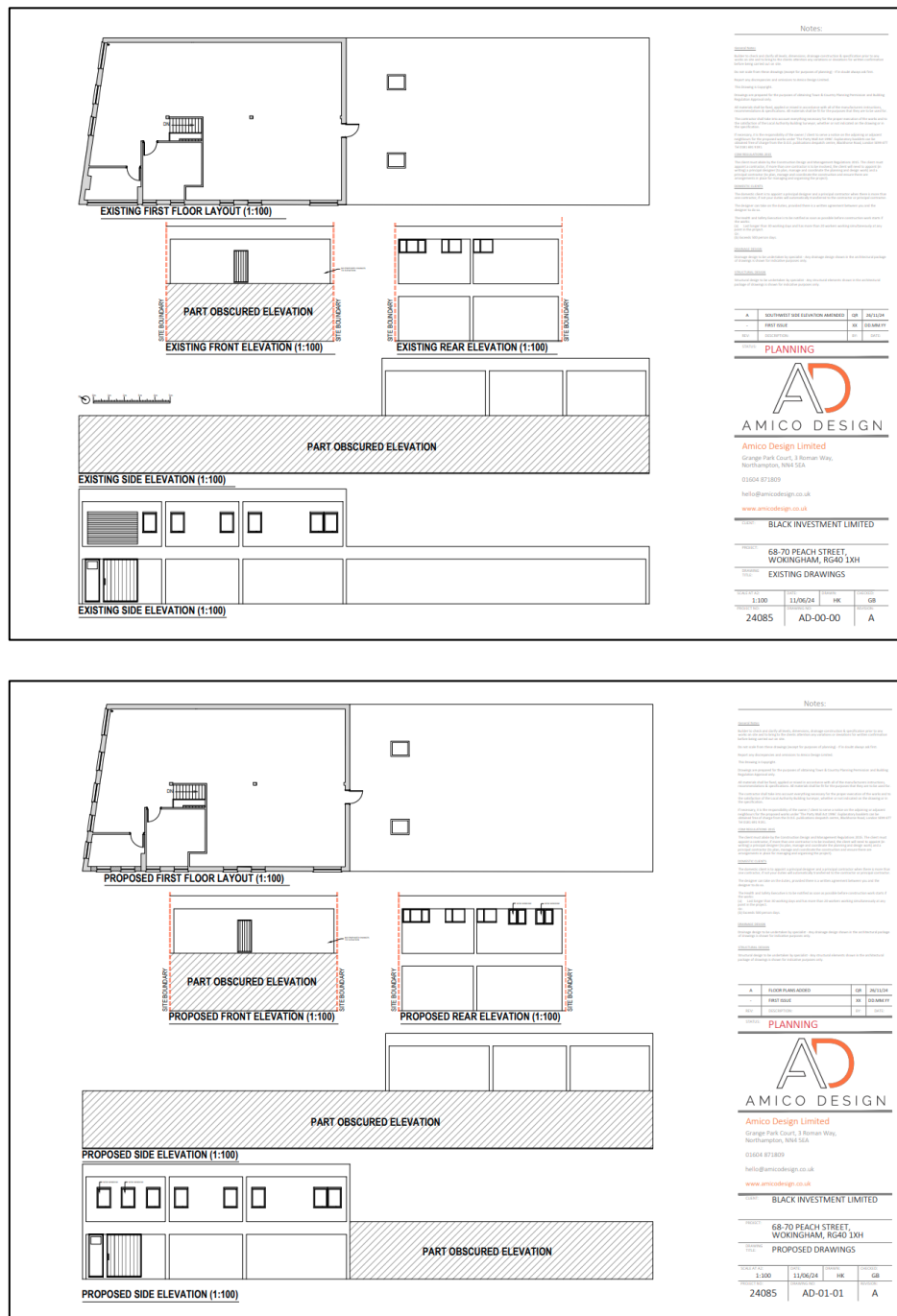
Pl.1: The north side of Peach Street, the frontages of Nos.68-70 arrowed.



Pl.2: The building to the rear of Nos.68-70 Peach Street from the north-west.

## 6. The Proposals

As indicated in the drawings below the proposals are limited in scope and impact on the appearance of the building. They are mainly confined to internal changes to the first floor which is to be converted into residential apartments. The only external changes of note are to the fenestration on the first floor at the north-western quarter of the building. The larger opening at this level on the west side will be replaced by two smaller windows; two additional windows will also be added on this elevation, as well as on the north elevation.



Figs.6 & 7: Existing (top) and proposed plans and elevations.

## **7. Heritage Impact Assessment**

### **7.1 Impact on Heritage Assets Within the Study Area**

There are no statutorily listed buildings within the study area and it is not within a scheduled ancient monument – though it is within the conservation area (*see below*). The building appears to be of the 1960's redevelopment of the area and is of little or no architectural or historical interest and so could not be considered to be a non-designated heritage asset.

### **7.2 Impact on Adjacent Designated Heritage Assets**

Despite its location in the historic core of Wokingham, there are surprisingly few listed buildings in the eastern portion of Peach Street. The older surviving buildings in that street are on the south side and any reciprocal views to the study building are blocked by the modern developments in between. There are more surviving historic buildings in Rose Street and some of the rear elevations of those buildings, and their grounds where these survive, are visible from the study building – though largely screened by trees and mature boundaries.

However, despite these reciprocal views it is evident that the minor changes to the windows of the 1960's buildings will have no impact at all in heritage terms to the significance of the settings of any of these listed buildings on Rose Street, or on the nearby All Saints church, or on any other adjacent heritage asset – designated or non-designated. Consequently neither Section 66 of the 1990 Planning Act nor Paragraphs 214-6 of the NPPF would be engaged.

### **7.3 Impact on the Conservation Area**

The site lies within the extensive Wokingham Town Centre Conservation Area. Conservation areas are designated heritage assets under the auspices of the National Planning Policy Framework and have been protected – with a varying degree of success - from the adverse impact of unsuitable development through the passing of various planning Acts since 1967, the last being the consolidation Planning Act of 1990.

The Wokingham Town Centre Conservation Area was initially designated in 1970 and extended in 1986 and 1996; the present Conservation Area Appraisal appears to be tied in with the 1996 extension. The Appraisal recognised that the architectural palette of the conservation area is extremely varied, and that much of the central section, especially along Peach Street, had been considerably redeveloped in the recent past and that few historic buildings survived.

To the rear of the street front the ancillary blocks, car-parking areas and service yards have considerably eroded the historical topography and morphology of the town that was still evident in early-20<sup>th</sup> century mapping.

Consequently, the general historical character of the area has thus been somewhat fragmented and it is suggested that in the vicinity of the study area is essentially of the second half of the 20<sup>th</sup> century – demonstrating the commonly accepted fact that not all parts of a conservation area contribute positively the characteristics that give it its significance in heritage terms.

There is an element of surviving historic townscape on Rose Street to the north of the site and some of the listed buildings on its south side retain their long linear curtilages. However, the proposed changes to the building are so limited in their external impact that there would be no harm resulting. Consequently, it is considered that there would be no harm to the character of significance of the conservation area as a result of these minor proposals.

#### **7.4 Archaeological Issues**

The site lies in the medieval core of Wokingham, although much of the area has been considerably altered and the degree of groundworks in the recent past which would have impacted on buried archaeological deposits has clearly been substantial. It is also, of course, the case that these proposals are to a standing building and will not result in any groundworks. There are, therefore, no archaeological issues arising.

#### **8. Conclusions**

For the reasons outlined above it is considered that the proposals are extremely limited in their scope and involve a building of the third quarter of the 20<sup>th</sup> century of no architectural or historic value with a close setting of equally limited significance. Whilst there will be a degree of visual change as a result of these proposals, there will be no adverse impact or harm to any adjacent heritage assets – designated or non-designated – or to the conservation area.

Conservation areas are not and were not designed to stifle development but to guide such development and change so that it does not impact adversely on the special character of a conservation area that led to its initial designation. This is summarised in the foreword to the current Historic England guidance which states that:

*‘Change is inevitable. This guidance sets out ways to manage change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management’.*<sup>13</sup>

That change does not inevitably equate to harm in planning law was made clear in one of the key High Court judgements of Lord Bridge, related to developments within conservation areas: *South Lakeland District Council vs. Secretary of State for the Environment*.

He stated that whilst all developments within a conservation area ‘*must give a high priority to the objective of preserving or enhancing the character or appearance of the area*’, where a development would not have any adverse impact and met other planning requirements:

*‘.... One may ask rhetorically what possible planning reason there can be for refusing to allow it. All building development must involve change and if the objective of Section 277(8) [of the 1971 Planning Act, substantially the same as Section 72(1) of the 1990 Act] were to inhibit any building development in a*

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<sup>13</sup> EH

*conservation area which was not either a development by way of reinstatement or restoration on the one hand ('positive preservation') or a development which positively enhanced the character or appearance of the area on the other hand, it would surely have been expressed in very different language...'.<sup>14</sup>*

Consequently it is considered that there will be no harm – substantial or less than substantial – to any adjacent heritage asset – designated or non-designated – or to the conservation area. For these reasons it is considered that neither Sections 66 or 72 of the 1990 Planning Act nor paragraphs 214-6 of the National Planning Policy Framework would be engaged.

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<sup>14</sup> 1992, *South Lakeland District Council vs. Secretary of State for the Environment*

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*their*

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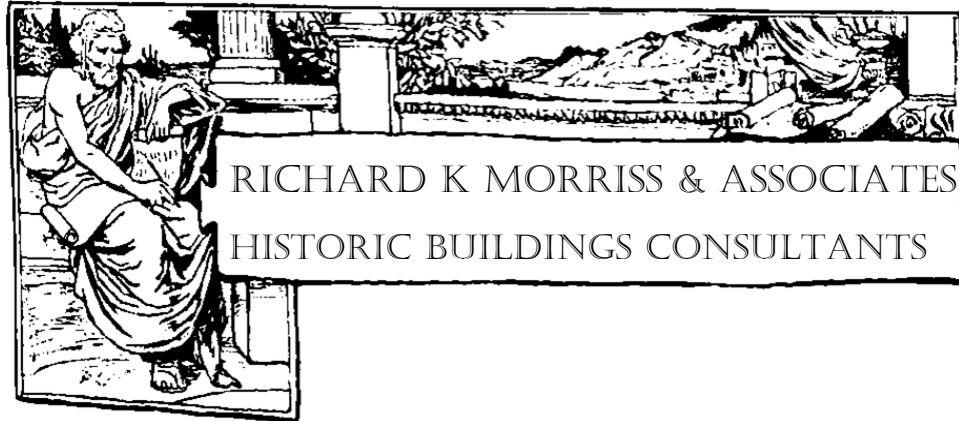
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## *The Consultancy*

*Richard K Morriss founded this Consultancy in 1995 after previously working for English Heritage and the Ironbridge Institute of the University of Birmingham and spending eight years as Assistant Director of the Hereford Archaeology Unit. Although Shropshire-based the Consultancy works throughout the UK on a wide variety of historic buildings for clients that include the National Trust, the Landmark Trust, English Heritage, the Crown Estates, owners, architects, planning consultants and developers. It specialises in the archaeological and architectural analysis of historic buildings of all periods and planning advice related to them. It also undertakes broader area appraisals and Conservation Management Plans.*

*Richard Morriss is a former Member of the Institute of Field Archaeologists and of the Association of Diocesan and Cathedral Archaeologists, archaeological advisor to four cathedrals, occasional lecturer at Bristol and Birmingham universities, and author of many academic papers and of 20 books, mainly on architecture and archaeology, including *The Archaeology of Buildings* (Tempus 2000), *The Archaeology of Railways* (Tempus 1999); *Roads: Archaeology & Architecture* (Tempus 2006) and ten in the *Buildings of* series: Bath, Chester, Ludlow, Salisbury, Shrewsbury, Stratford-upon-Avon, Warwick, Winchester, Windsor, Worcester (Sutton 1993-1994). The latest work is an Historic England funded monograph on the Houses of Hereford (Oxbow 2018).*

*He was a member of the project teams responsible for the restoration of Astley Castle, Warwickshire, winner of the 2013 RIBA Stirling Prize; the restoration of the Old Market House, Shrewsbury, winner of a 2004 RIBA Conservation Award; and Llwyn Celyn, Monmouthshire, winner of the RICS Conservation Project of the Year 2019. He has also been involved in several projects that have won, or been short-listed for, other awards including those of the Georgian Group for Mostyn House, Denbigh; St. Helen's House, Derby; Radbourne Hall, Derbyshire and Cusgarne Manor, Cornwall.*



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