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## HERITAGE ASSESSMENT

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In respect of

**58 Finchampstead Road, Wokingham, RG40 2NS**

On behalf of

**Blueking Holdings Limited**

**AHC REF: PM/10273**

**Date: March 2024**

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## 1.0 INTRODUCTION & SCOPE OF REPORT

- 1.1 This report has been prepared and written by Patrick Christopher Maguire, IHBC, Associate Director at Asset Heritage Consulting Ltd., on behalf of Blueking Holdings Limited in order to provide an independent assessment of the heritage significance of 58 Finchampstead Road, Wokingham.
- 1.2 58 Finchampstead Road is not covered by any statutory heritage designations. It does not appear on the statutory list. It is not located in a conservation area nor in what could reasonably be considered the setting of such.
- 1.3 The only designated heritage asset in the wider vicinity is Southbrook, a Grade II listed building located to the west, but this is well separated from 58 Finchampstead Road by distance, intervening development (Eyre Court and 58a Finchampstead Road, both of which were constructed within the last 25 years), and intervening planting. The site cannot reasonably be considered to form a significant element of the setting of that listed building.
- 1.4 While there are no statutory heritage designations affecting the site, as part of a recent pre-application response, Council officers have identified 58 Finchampstead Road as a non-designated heritage asset of '*limited significance*' (pre-application response dated 16<sup>th</sup> January 2024).
- 1.5 The glossary of the NPPF defines a heritage asset 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)*' (my emphasis).
- 1.6 As 58 Finchampstead Road has been identified as a non-designated heritage asset by the local planning authority, it meets the definition set out in the NPPF; however, the purpose of this report is to provide a reasoned assessment of the heritage significance of the building in order to allow the local planning authority to properly carry out the necessary test at paragraph 209 of the NPPF, which requires consideration of both the significance of the asset in question and the degree of harm.

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- 1.7 With this in mind, this report briefly sets out the historical background to the development of the site and the surrounding area and focuses on assessing what (if any) 'significance' can be attributed to the existing building as a 'heritage asset'.
- 1.8 As such, this report complies with the requirements of paragraph 200 of the National Planning Policy Framework (NPPF) and the onus it places on those planning changes to historic assets to include a clear description of the significance of the assets affected, albeit that the requirement in the NPPF is only such that, *'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'*.
- 1.9 Furthermore, such an approach is identified as best practice in Historic England's 'Historic Environment Good Practice Advice in Planning Note 2 – Managing Significance in Decision-Taking in the Historic Environment' (March 2015), which notes that, *'the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision'*.
- 1.10 Following the assessment carried out for this report, it is my considered opinion that 58 Finchampstead Road, while not devoid of interest, is of only minimal significance in heritage terms. Indeed, this significance is limited to the extent that it is my considered opinion that it should not be considered a 'non-designated heritage asset' as that term is understood in the context of the PPG, that being one of the '*minority*' of buildings that, *'have enough heritage significance to merit identification as non-designated heritage assets'* (PPG paragraph 039 Reference ID: 18a-039-20190723).
- 1.11 However, as the Council have identified 58 Finchampstead Road as such, the glossary of the NPPF (quoted at paragraph 1.5 above) indicates that it should be treated as a non-designated heritage asset in policy terms. In my view, it is therefore a non-designated heritage asset of the very lowest significance.
- 1.12 In determining the planning application, which includes the demolition of 58 Finchampstead Road, the Council will therefore need to apply the non-statutory test at paragraph 209 of the NPPF, which states that, *'The effect of an*

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*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'.*

- 1.13 In this case, the significance of heritage asset is very low while the scale of harm is a total loss of significance. This will need to form part of a balanced judgement as part of the determination of the application.
- 1.14 There is no case law to support how this balanced judgement should be administered but in practice this non-statutory test commonly forms a material consideration as part of the more general planning balance.
- 1.15 The non-statutory test at paragraph 209 is a simpler and less onerous test than the tests at paragraph 207 and 208 regarding harm to designated heritage assets (which is quite as it should be, as those tests ultimately deal with the administration of statutory tests) and, unlike those tests, does not require a direct weighing of harm against public benefits. That said, where public benefits would flow from an application, these clearly should form part of the necessary balanced judgement. In this case, the public benefits that flow from the scheme include the provision of a net increase of three much-needed housing units.

## 2.0 HISTORICAL BACKGROUND & DESCRIPTION

- 2.1 The application site is located to the south of Wokingham and enclosed to the north by the banking to the Staines, Wokingham, and Reading Branch of the London & South-Western Railway (this stretch of which opened in 1856). To the west of the site, and flanking the access from Finchampstead Road, is Southbrook, an 18<sup>th</sup>-century house, altered in the 20<sup>th</sup> century (and added to the statutory list at Grade II in 1987).
- 2.2 The application site appears to have historically formed part of the grounds of Southbrook and part of the site can be seen as such on an aerial image of 1928 (before No.58 was constructed) (**Fig.1**). This image also shows a predecessor to the modern Eyre Court (which was demolished and replaced with the existing building in the early 21<sup>st</sup> century; planning ref. F/2002/5971) set between Southbrook and the gardens to the east.



**Fig.1. 1928 aerial image (HE ref. EPW023259) looking northwards. Southbrook is visible to the left and the application site just falls within the right-hand side of the image**

- 2.3 OS maps of the 1930s appear to show an access along the northern side of the gardens and a separate plot at the eastern end but do not show a building on the site of No.38. This includes the 1944 1:10,560 scale OS map, which was surveyed in 1938 (**Fig.2**). This is interesting, as No.58 retains a datestone

(**plate 1**) bearing the inscription 'FM & CM 1936'. This appears to suggest that the building was either 'missed off' the 1938 revision of the OS map or that the datestone is incorrect.



**Fig.2. 1944 (revised 1938) 1:10,560 scale OS map. This appears to show a distinct plot for No.58 and site access from Finchampstead Road but does not yet show the house**

- 2.4 It appears, therefore, that 58 Finchampstead Road was built on or shortly after 1936. Indeed, even if the datestone is incorrect, on stylistic grounds alone the building is unlikely to be substantially later in date, appearing typical of suburban development of the 1930s.
- 2.5 The initials 'CM' on the datestone may relate to a C.E.E. Masters, who lived at the adjacent Eyre Court in the 1930s. Various Building Control plans (although none relating to this site) held by the Berkshire Record Office (e.g. RD/E/SB1/81/1-4 for seven semi-detached cottages in Binfield in 1935-36) list Masters as the owner/applicant (working with either Edward and Charles Bowyer or Ernest Brown as architects, although some entries also list no architect), suggesting that he had an interest in property development. Considering the initials, his development work in the area, and his proximity to the site in the relevant period, Masters is a good candidate as the developer of 58 Finchampstead Road.

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- 2.6 Changes on the site since the construction of No.58 in the mid-20<sup>th</sup> century include the formation of a timber-clad, free-standing, swimming pool building in the garden to the east (**plate 2**) and, at the very end of the 20<sup>th</sup> century, the formation of a new plot to the south-west of the house, housing a bungalow, 58A Finchampstead Road (**plate 3**). This separate house shares the site access from the west.
- 2.7 58 Finchampstead Road is a detached house, typical of larger suburban dwellings of the 1930s. It is designed in a loose Neo-Georgian style, in some ways evocative of a 'Georgian box' but with a somewhat over-scaled hipped roof.
- 2.8 It is arranged over two storeys and the principal elevation to the west comprises three bays, with three-light Crittall windows with soldier-course lintels to the outer bays (**plate 4**). It is in a red multi-brick laid in stretcher bond (suggesting cavity construction, which was common by the 1930s) with brick quoins to the corners. The central bay has an off-set front door, its position dictated by the internal arrangement of rooms (it opens directly onto a reception room). The effect of this off-set on the symmetry of the elevation is mitigated through an external porch. The porch is in Flemish bond (i.e. load-bearing) but the bricks do not match those on the main elevation, suggesting this may be a non-original addition (**plate 5**).
- 2.9 On the north side of the building is an attached garage. The bricks and parapet detail match those of the porch but the brickwork is laid in stretcher bond (**plate 6**). This suggests the garage is a later addition contemporary with the porch but, with its larger size, exhibiting cavity-wall construction. The later date of the garage is supported by the presence of a storm-proofed timber casement window on this structure, as opposed to the Crittall windows found elsewhere on the building.
- 2.10 The south elevation of the house comprises the 'garden front' and opens onto a terrace above a sunken lawn (**plate 7**). As well as Crittall windows, the fenestration on this elevation includes an attractive Crittall French window (**plate 8**).

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- 2.11 The rear elevation to the east includes a single-storey projection (**plates 9-11**). This appears to be contemporary with the garage extension, although the current owner of the building has informed me (pers.comms.) that the eastern end of this projection was added by his parents (who owned the building from the 1950s onwards) to provide stepped access to the swimming pool building.
- 2.12 Internally, the building is typical of a 1930s' suburban house in modern use. It retains some original brick fireplaces with later gas fires (**plate 12**), alongside late 20<sup>th</sup>-century replacements (**plate 13**). There are late 20<sup>th</sup>-century kitchen and bathroom fittings (**plates 14 & 15**). Of more interest are the internal doors, which in almost all cases are the original, attractive, six-panel doors with Bakelite handles (**plates 16 & 17**) and some attractive fitted cupboards in the first-floor bedrooms (**plate 18**).
- 2.13 It is beyond the remit of this report, and my expertise, to comment on structural matters but it is worth noting that structural cracks are evident throughout the building (**plates 19-21**) and between the main house and the external porch (**plate 22**).

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### 3.0 ASSESSMENT OF SIGNIFICANCE

3.1 The purpose of this section of the report is to provide an independent assessment of the heritage significance of 58 Finchampstead Road.

3.2 As noted in the Introduction to this report, 58 Finchampstead Road is not the subject of any statutory heritage designations; however, it is possible for the heritage interest of a building without statutory designation to remain a material consideration in the planning process where this interest is sufficient for the building to be considered a 'non-designated heritage asset'.

3.3 A 'non-designated heritage asset' is defined by the PPG as:

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

*'A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets'* (Paragraph: 039 Reference ID: 18a-039-20190723).

3.4 As the PPG makes clear, it is perfectly possible for a building to possess a limited degree of heritage significance but not fall within the '*minority*' of buildings of sufficient, '*significance to merit identification as non-designated heritage assets*', i.e. not all buildings that possess any degree of heritage interest have, '*enough heritage significance*' to be considered 'non-designated heritage assets'.

3.5 Other than this clearly-expressed guidance, there are no nationally-recognised criteria for whether a building should be considered a 'non-designated heritage asset' or not.

3.6 As the PPG makes it clear that this is not a binary consideration (i.e. the fact that a building has some heritage interest is not the same as saying it is of sufficient interest to be considered a 'non-designated heritage asset'), it is

necessary to apply a degree of professional judgment in determining whether or not a building merits this non-statutory status.

3.7 It is likely for this reason that many local authorities consider the status of a 'non-designated heritage asset' to be analogous to inclusion on their local lists (for instance, Oxford City Council's local list is called the 'Oxford Heritage Asset Register'), allowing the use of either Historic England's guidance or locally-adopted criteria for local listing to be used to determine whether or not a building should be considered a 'non-designated heritage asset'.

3.8 Indeed, such an approach is actively encouraged in the PPG, which states that:

*'It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies'* (Paragraph: 040 Reference ID: 18a-040-20190723).

3.9 Wokingham Borough Council does maintain a local list, described as 'Buildings of Traditional Local Character'. As confirmed by the Council's 'Planning Policies and Constraints Map' (<https://experience.arcgis.com/experience/d76c713282874f3da74b3e46bc473d3f/>, accessed 13<sup>th</sup> March 2024), 58 Finchampstead Road does not currently appear on this list.

3.10 The PPG does, however, also note that it may be appropriate in some cases for local planning authorities to, *'also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations'* (Paragraph: 040 Reference ID: 18a-040-20190723).

3.11 The PPG is clear that, *'Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence'* (Paragraph: 040 Reference ID: 18a-040-20190723). This is considered below.

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*Assessment of significance*

- 3.12 As set out in the Introduction to this report, 58 Finchampstead Road is not the subject of any statutory or non-statutory heritage designations, being located outside of a conservation area and appearing on neither the statutory nor local lists.
- 3.13 The NPPF defines significance 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'*.
- 3.14 These 'values' (archaeological, architectural/artistic, and historic), which draw from Historic England's 2008 'Conservation Principles' are further explored in the PPG.
- 3.15 Regarding archaeological interest, the PPG states that, *'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'* (Paragraph: 006 Reference ID: 18a-006-20190723).
- 3.16 Although it is beyond the remit of this Heritage Assessment to comment on below-ground archaeology, the status of 58 Finchampstead Road as a simple mid-20<sup>th</sup>-century dwelling means that it is unlikely to hold any material, physical evidence of past human activity worthy of expert investigation.
- 3.17 As such, I do not identify any 'archaeological interest' in relation to the existing building.
- 3.18 The PPG defines 'architectural and artistic interest' as, *'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 skill, like sculpture'* (*Ibid.*).

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- 3.19 58 Finchampstead Road is an attractive but relatively typical building of the 1930s. Being a relatively recent building dating from a period from which large numbers of buildings were constructed and survive both nationally and regionally, a greater degree of scrutiny and selection is needed when considering architectural interest (and historic interest, see below) than with buildings from earlier periods that survive in smaller numbers.
- 3.20 I note that the pre-application feedback dated 16<sup>th</sup> January 2024 states that, *'The property is of an age and form that it is considered to be an example of a distinctive inter-war period ho[u]sing form'* (p.4). While that is true as far as it goes, it is difficult to ascribe a material degree of heritage interest on this basis. It is a quite typical example of a relatively common building type.
- 3.21 While it is perhaps imprecise to use the term 'typical' to describe a building constructed in a period when very large numbers of buildings were erected both nationally and locally in a variety of styles, this simple building is of a form of no notable rarity or interest and exhibits no innovation in its design or construction.
- 3.22 It retains a fair degree of its simple, original character externally, although it has been altered, including through the addition of the porch, garage, and rear projection. It retains its original Crittall windows and, internally, most of its original doors.
- 3.23 While its simple original character is still quite legible, this was never an architecturally significant building, and remains remarkable in neither its quality nor level of preservation.
- 3.24 Taking this into account, this building has only a negligible level of 'architectural and artistic interest'.
- 3.25 The PPG defines historic interest as, *'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'*.

- 3.26 58 Finchampstead Road has no known, significant historical associations. The possible (but unconfirmed) attribution of the development of the site to C.E.E. Masters (see paragraph 2.5 above) does not convey any association value, as Masters is not a figure of any notable historic interest (indeed, I have been able to uncover no information about him other than his occupation of Eyre Court in the 1930s and his interest in a small number of small-scale developments in the county as indicated by the records of Berkshire Record Office).
- 3.27 While the site appears to have once fallen within the historic grounds of Southbrook, it is a notably later example of backland development and has no particular association with that listed building. Indeed, it is now very well separated from that building and what is legible as its gardens by distance, intervening development (a block of flats and its associated car-park, as well as 58A Finchampstead Road), and intervening planting.
- 3.28 58 Finchampstead Road was built in a period of extensive growth, when large numbers of houses were being built both locally and nationally. While this does mean that the building illustrates part of a national trend, simple buildings of this type and character are well represented both regionally and nationally, so it is difficult to assign any but the most minimal illustrative interest to this building.
- 3.29 Of course, despite such trends and buildings being relatively common, a greater degree of historic/illustrative interest could be identified if 58 Finchampstead Road was a particularly noteworthy or well-preserved example of inter-war residential development.
- 3.30 However, the building is not of noteworthy design or architectural ambition. It has also been altered externally and while it is important not to overstate the effect of these alterations on the building (which does remain clearly legible as an inter-war suburban dwelling and does benefit from the retention of its original windows), these do mean that it cannot reasonably be considered a notably well-preserved example of its building type.
- 3.31 Taking all these factors into account, it is my firm opinion that the building is of only very limited interest in heritage terms. For this reason, I do not consider it to fall within the '*minority*' of buildings that possess sufficient '*heritage*'

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*significance to merit identification as non-designated heritage assets'* (PPG paragraph 039 Reference ID: 18a-039-20190723).

- 3.32 That said, the local planning authority have identified this building as a non-designated heritage asset, albeit accepting it is of only '*limited significance*' (pre-application feedback dated 16<sup>th</sup> January 2024).
- 1.16 As noted in the Introduction of this report, The glossary of the NPPF defines a heritage asset 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)*' (my emphasis).
- 3.33 For the reasons set out above, in my professional opinion this building should not be identified as a non-designated heritage asset but, irrespective of my view, simply through dint of the fact that 58 Finchampstead Road has been identified as a non-designated heritage asset by the local planning authority, it meets the requirements of the definition set out in the NPPF.
- 3.34 However, also for the reasons set out above, and crucially in the context of the test at paragraph 209 of the NPPF, it must be regarded as a heritage asset of only the most limited heritage interest.

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## 4.0 CONCLUSIONS

- 4.1 This report has examined the historic development of 58 Finchampstead Road before assessing its significance in heritage terms.
- 4.2 As demonstrated by this report, 58 Finchampstead Road is a simple inter-war dwelling of no rarity or notable architectural merit and possesses only the most minimal significance in heritage terms.
- 4.3 However, recognising that the Council have identified the building as a non-designated heritage asset, the effect of any application on its significance must be a material consideration in planning terms.
- 4.4 The test at paragraph 209 of the NPPF requires that, in the case of 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'*.
- 4.5 In this case, the significance of the heritage asset is very low while the scale of harm is a total loss of significance. This will need to form part of a balanced judgement as part of the determination of the application.
- 4.6 In the case of non-designated heritage assets, the NPPF does not require any justification in excess of this non-statutory test; if the test is met, justification for the harm to the building or loss of significance has been demonstrated.
- 4.7 In this context, I note the relevant case law provided by the 'Bedford' High Court decision ([2013] EWHC 2847 (Admin)). This considered the guidance at what was then paragraph 132 of the NPPF that, *'As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification'* and took the view that this guidance did not constitute a free-standing test and that the *'clear and convincing justification'* was instead provided by the tests set out regarding harm (in that particular case paragraph 134 – now 208 – regarding less than substantial harm to designated heritage assets).

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- 4.8 Indeed, the guidance that '*any harm of loss*' to all heritage assets should require '*clear and convincing justification*' no longer forms part of the NPPF in relation to non-designated heritage assets, which now references this only in the context of harm to designated heritage assets at paragraph 206 (and where it still does not constitute a free-standing test based on the reasoning set out in 'Bedford').
- 4.9 What this all indicates is that the justification required for any harm or loss to a non-designated heritage asset arises from the test at paragraph 209; if that test is met then the harm or loss is justified.
- 4.10 Of course, where other considerations, such as structural soundness or viability, are relevant they may form part of the 'balanced judgement' required by paragraph 209 but there is no requirement in statute or guidance that such issues constitute a prerequisite justification for the loss of a non-designated heritage asset, which simply requires a balanced judgement taking into account both the level of harm and the significance of the heritage asset affected.
- 4.11 There is no case law to support how this balanced judgement should be administered but in practice this non-statutory test commonly forms a material consideration as part of the more general planning balance.
- 4.12 The non-statutory test at paragraph 209 is a simpler and less onerous test than the tests at paragraph 207 and 208 regarding harm to designated heritage assets (which is quite as it should be, as those tests ultimately deal with the administration of statutory tests) and, unlike those tests, does not require a direct weighing of harm against public benefits. That said, where public benefits would flow from an application, these clearly should form part of the necessary balanced judgement. In this case, the public benefits that flow from the scheme include the provision of a net increase of three much-needed housing units.
- 4.13 The planning balance in this case is considered in the documentation prepared by Davis Planning Ltd.

## PLATES



**Plate 1. Datestone on 58 Finchampstead Road**



**Plate 2. Free-standing swimming pool building in the rear garden**



**Plate 3. 58A Finchampstead Road was erected to the south-west of No.58 at the very end of the 20<sup>th</sup> century**



**Plate 4. The principal, western elevation of 58 Finchampstead Road**



**Plate 5. The porch (detail)**



**Plate 6. The garage on the northern side of the house**



**Plate 7. The southern, 'garden front' of the house**



**Plate 8. Detail of French window on the southern elevation**



**Plate 9. The house from the east**



**Plate 10. Kitchen/utility room extension (detail)**



**Plate 11. Kitchen/utility room extension (detail)**



**Plate 12. 1930s' brick fireplace with later gas fire**



**Plate 13. Late 20<sup>th</sup>-century replacement fireplace**



**Plate 14. Late 20<sup>th</sup>-century kitchen fittings**



**Plate 15. Late 20<sup>th</sup>-century bathroom fittings**



**Plate 16. Original doors on the first floor**



**Plate 17. Detail of typical Bakelite door handles in the building**



**Plate 18. Fitted cupboard and fireplace in first-floor bedroom**



**Plate 19. Cracks are evident to external walls throughout the building**



**Plate 20. Cracks are evident to external walls throughout the building**



**Plate 21. Cracks are evident to external walls throughout the building**



**Plate 22. The porch is coming away from the western elevation of the house**