

**From:** Peats, Richard  
**Sent:** 27 October 2023 10:52  
**To:** Planapps  
**CC:** Matthew Shepherd; Debra Inston  
**Subject:** Kennet Centre, application 23/02094/FULMAJ - Historic England response - FAO Matthew Shepherd  
**Attachments:** Kennet centre detailed design comments.docx;  
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Dear Matthew

Thank you for consulting Historic England on this application.

Please find attached our advice, which takes the form of a letter setting out our views and an appendix containing a more detailed analysis of design elements of the proposals.

Regards,

**Richard Peats FSA MA IHBC**  
**Principal Inspector**  
**Historic England**  
**London and South East Region**

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## **Application 23/02094/FULMAJ – Detailed comments on design**

### Block C

The Cheap Street elevation of Block C is divided into 3 sections: a gabled warehouse-like building, a parapeted central section and a block with a mansard roof. The upper parts of the warehouse building could look reasonably convincing if detailed well enough. But it sits over a vast vehicular entrance arch, three bays wide and 5 metres high, clad in oversized rusticated voussoirs. This would be so out of scale with the building above that it would appear absurd.

The adjacent building stretches the townhouse form two 5 storeys. Georgian townhouses in London can climb this high but hide their true height by placing an attic storey above a cornice and a mansard above that. The proposed building by contrast has no attic, a cornice at the top of the façade and a rusticated first floor, which emphasise rather than hide its height. The offset oriel window appears wilfully peculiar in a building otherwise wedded to symmetry. While this could be interpreted as playful it is more likely to read as jarring.

The next building in the series has a mansard roof and does a good job of managing the change in scale between the new buildings and historic streetscape but would only work effectively if the detailing was of very high quality. The drawings supplied suggest crude looking casement windows, it's unclear how deep the window reveals would be and windows on the ground and first floors set directly under soldier courses. If detailed in this way the overall feel would be uncomfortably reminiscent of 1980s domestic architecture.

### Block E

The part of Block E facing Bartholomew Street and wearing classical dress is unlikely to result in a satisfactory building, even with the benefit of Robert Adam's details. On the ground floor the apparently recessed doorways set within oversized door surrounds look very odd, as do the five light windows sitting under chunky arched fanlights. Likewise, the rendered semi-circular panels above the first floor windows and the small windows flanking the second floor oriels which appear to be without any detailing at their heads would look peculiar. By contrast, the northern three bays, which bear more than a passing resemblance to Adam Architecture's recent and very successful work at Trinity College Oxford, could look very handsome if the fine detailing and materials of high enough quality. Likewise, the higher element, which is of a wholeheartedly contemporary design, is much more coherent and could be a good-looking building.

### Block F

The Bartholomew Street elevation of Block F is well massed, but the central element looks muddled. Oversized archways above the doors, lots of different window types and a different brick for the second floor have all been added, presumably in an attempt to add visual interest but the effect is confusing rather than harmonious. By contrast the flanking elevations, one with a steep gable and the other turning the corner, are interesting takes on traditional forms and could result in attractive

buildings if detailed well enough.

### Block G

Block G is an interesting blend of traditional and modern and could work well. However, the triumphal arch leading to May's Lane is not so successful. It would look overscale in the street scene and would probably best be omitted altogether.

### Block H

We remain of the view that the loss of 17-19 Market Place would be regrettable given the positive contribution it makes to the conservation area. As we have observed in the past, the design of the replacement building now proposed (Block H East) features a high central entrance looks awkward, as if it has been driven through an existing shopfront. Furthermore, the overly large windows on the upper storeys and the crude shopfront detailing are still a step backwards when compared to the existing building.



Mr Matthew Shepherd  
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Direct Dial: 0207 973 3632

Our ref: P01566254

27 October 2023

Dear Mr Shepherd

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**THE MALL, THE KENNET CENTRE, NEWBURY, RG14 5EN  
Application No. 23/02094/FULMAJ**

Thank you for your letter of 25 September 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

This application would involve the replacement of the Kennet Centre with a much larger group of buildings. These would be out of scale with the historic town centre and adversely affect a number of key views, harming the significance of the conservation area and many of the listed buildings within it.

This harm could be meaningfully reduced by relatively minor improvements to the façades of the elements of the scheme which interface most closely with the historic townscape.

Granting permission for this scheme would mean passing up the opportunity to redevelop this site in a way that truly enhances this important historic town centre.

Therefore, Historic England recommends that the Council should refuse permission unless the design of this scheme is improved.

**Historic England Advice**

The significance of Newbury town centre

This application involves a large site in the centre of the Newbury Conservation Area.



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Newbury is a very attractive town. It gets its character largely from the historic buildings that make up most of the town centre which mainly date from the 17<sup>th</sup> to the 19<sup>th</sup> centuries. The differing dates, architectural styles and detailing of these buildings create a varied and interesting street scene, while a common building line, shared scale of two to three stories and shared palette of local materials ensures that all sit happily together despite this variety. Much of the charm of this townscape is due its small scale: earlier buildings are not dwarfed by more recent ones and, despite the expansion of the town in the later 19<sup>th</sup> and 20<sup>th</sup> centuries, the centre still retains the character and feel of a market town.

This townscape is not merely of academic interest, it is what makes Newbury special. It makes the town a place people enjoy living in, working in and visiting; it gives residents pride in, and affection for, their home.

Many of the buildings in the town centre are listed in recognition of their national importance. There are around 40 listed buildings close to the Kennet Centre, including the Grade I listed St Nicholas Church and the prominent Corn Exchange and Town Hall (both listed grade II).

By contrast, the development site itself is made up entirely of modern buildings. While the design and detailing of these is disappointing, particularly the street scene along Market Street, the majority at least knit reasonably well into the historic townscape as they are of a similar scale to the surrounding buildings and vary in form and detailing in a bid to mimic the variety of the historic street scape. This modest scale of the Kennet Centre has allowed a number of Listed Buildings (The Catherine Wheel Inn, 33-34 Cheap Street and the Bricklayers arms in Bartholomew St) to be surrounded by it reasonably successfully.

The one part of the site which is worthy of note is 17-19 Market Place. This dates from the late 20<sup>th</sup> century but replicates the appearance of the 18<sup>th</sup> century building that previously stood on this site. It is a handsome Georgian style building with a pilastered front that relates very well to the older buildings around it. For these reasons it should be judged as making a positive contribution to the conservation area.

### The impact of the proposals on the significance of the town centre

The current scheme is a revision of a scheme initially submitted in 2021. Historic England, along with others, objected to the proposals on the grounds that the scale and design of the buildings envisaged would harm the significance of the conservation area and the listed buildings within it. Planning permission was subsequently refused. The current scheme is of a reduced scale, envisaging buildings of up to eight storeys.

The majority of the buildings that currently form the Kennet Centre are not of



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architectural quality or historical interest. The site therefore presents an opportunity for redevelopment that is more sympathetic to the historic town.

Unfortunately, the current scheme still harms rather than enhances the conservation area, and the listed buildings within it through the effect on their setting. This is due to its scale, which is still too large for its context, and the design of some of the proposed buildings.

a) issues of scale

The reduction in height is welcome: as a result the current scheme would be markedly less harmful than the previous application, although harm remains (see below)

This reduction in height would make the scheme less overbearing when viewed from nearby. For instance, while the development would be visible in view from Northbrook Street (view 2) the reductions in height, combined with alterations to the design which mean that from this angle the development would be seen as a varied collection of pitched roofs, mean that it would not intrude on the townscape in the same way that the previous scheme did. Once on Bridge Street (view 3) the proposed buildings are likely to blend into the street scene very well. Similarly, when viewed from the Market Place (views 4 and 5) there is a slight increase in scale, but it is not one that would be out of keeping with the surrounding townscape.

By contrast, the impact in views from further away is more marked. For instance, a mass of building rising up above the townscape would be visible in view from the Clock Tower (view 1), and in views of the wharf (view 8), where it would rise above the ridge line of the Grade II\* listed Corn Store. The reduction in height means that these buildings would not be out of scale to the extent that previous schemes were, but the mass of the buildings remains out of character with the townscape and therefore would be harmful.

b) Issues of design

The massing and general form of the blocks that closely interact with the historic townscape (block C, E, F, G and H) is sensitive and creative. Unfortunately, the detailing of these blocks is not successful. The design approach adopted takes features from historic building plays with them: for instance, elements are enlarged or greatly simplified. While this approach can be playful it unless done with the utmost sensitivity these paraphrases of historic buildings can become parodies, which erode the significance of the real thing. An example of this is the rusticated archway in Block C. A feature found in many old buildings has been enlarged to a point far beyond any historic precedent and begins to look absurd. The span of the arch is such that it is obviously a piece of scenery, reliant on steel and concrete for support. This approach gives the facades the air of a stage set rather than real buildings that erodes the



significance of the real historic buildings around them, thus causing harm. This is disappointing as, if a more sensitive approach was taken to elements such as windows and doorways, these could be genuinely good buildings. Detailed comments about the design of these blocks are appended to this letter.

The exemplar design details supplied by Adam Architecture are excellent examples of classical detailing but do not address the principal issue, which is the way elements, such as doorways, cornices and windows are handled rather than the precise moulding profile selected (though this too will be important). Furthermore, it is not clear which building the details in sheet 1 relate to.

If built these frontages are unlikely to become a cherished part of the townscape. A townscape as good as Newbury deserves better from what is a once in a generation opportunity that redevelopment of the Kennet Centre presents. Therefore, these new frontage designs cannot be said to outweigh, or even meaningfully reduce, the harmful impact of taller elements of the scheme.

c) Conclusions, the overall impact of the scheme

In summary, we remain of the view that these proposals remain at odds with the historic character of Newbury's townscape and would harm the Newbury Conservation Area and the setting of many of the listed buildings within it.

The National Planning Policy Framework divides harm to heritage assets into two categories: substantial, which is a very high bar requiring all, or a good deal, of the significance of a heritage asset to be removed for it to be reached; and less than substantial, which encompasses a very wide range of harm, from hardly material, to something just below that high bar.

We do not consider the harm to the conservation area to be substantial; but these proposals would compromise the experience of being in the conservation area (and that of the listed buildings within it) from a number of ways, causing a moderate level of harm.

### Legislative and Planning Policy Considerations for this proposal

In determining this application, you have a statutory duty, as set out in sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.



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This application also needs to be assessed against the policies contained within the National Planning Policy Framework (NPPF 2021) relating to the historic environment, particularly paragraphs 194, which requires an application to describe the significance of any heritage assets affected; 195, which stresses the need to avoid or minimise any conflict between the a heritage asset's significance and any aspect of the proposals affecting it; 197, which emphasises the desirably of sustaining and enhancing the significance of heritage assets; 199, which requires great weight to be given to conserving the significance of designated heritage assets (which includes listed buildings and conservation areas); 200, which requires clear and convincing justification for any harm to the significance of a designated heritage asset; and 202, which requires harm to significance to be weighed against public benefits.

The NPPF policies on design also apply in this case, particularly paragraph 130, which states that planning decision should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting; and paragraph 134, which states that development that is not well designed should be refused.

Also of relevance is Area Delivery Plan Policy 2 of West Berkshire Council's Core Strategy (2012). This states that development in Newbury "will respect the historic environment of the town" and that "opportunities will be taken to enhance the townscape". The site is not included within the Council's Housing Site Allocations DPD (2017).

#### Historic England's position on the proposals

Redeveloping the Kennet Centre offers a rare chance to greatly enhance the town centre, but it must be done very sensitively: the mistakes of the past should not be repeated. The current proposals fail to take this opportunity. They would harm rather than enhance the character of the conservation area.

Given the harmful nature of the proposals, the requirement of legislation to have special regard to the preservation of listed buildings and their setting, the requirement of the NPPF to give great weight to the conservation of designated heritage assets and the fact that this development does not respect the historic environment of Newbury as required by the Council's Core Strategy, there should be a presumption against this development.

Therefore, our recommendation is that the application should be refused unless the Council are convinced that, having worked through paragraphs 194-202 of the NPPF, the harm is clearly and convincingly justified. Given the great weight that should be given to that harm in the planning balance, meaningful public benefits would be needed to outweigh it.



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We cannot accept that there is a clear and convincing justification for the harm caused because, with relatively minor improvements to the design of certain facades, the level of harm could be significantly reduced. Furthermore, we do not consider that the proposals satisfy the policies on good design set out in the NPPF.

This is such an important site for Newbury that it is important to get the best possible solution here. We urge the Council to take a long-term view and a robust approach when considering this application.

### **Recommendation**

Historic England objects to the application on heritage grounds.

This application would harm the Newbury Conservation Area and many of the listed buildings within it. The Council should refuse it unless they are confident that this harm has clear and convincing justification and is outweighed by public benefits, as is required by the NPPF.

Improving the appearance of blocks C, E, F, G and H would meaningfully reduce the level of harm. If the issues of design we have raised in our letter were addressed, we would reconsider our objection.

Your authority should take these representations into account and seek amendments as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

**Richard Peats**

Team Leader

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