



Planning Appeal Statement: Objection to the Eagle Quarter Development

Impact on Newbury's Historic Environment

Prepared in reference to:

Historic England's "*Conservation Principles, Policies and Guidance*" (2008)
Newbury Neighbourhood Development Plan survey carried out 2022
The Newbury Town Centre Conservation Area Appraisals (2021, adopted 2024)
The Newbury Town Plan 2019-2036.

1. Introduction

This statement has been prepared in support of a formal objection to the proposed Eagle Quarter development in Newbury town centre. It outlines serious concerns regarding the scale, design, and potential heritage impact of the proposed scheme, referencing key principles from Historic England's "*Conservation Principles, Policies and Guidance*" (2008). The proposed development risks undermining the architectural character, historic setting, and communal value of Newbury's historic environment, particularly in relation to key heritage assets such as St. Nicolas Church, Newbury Town Hall and the listed public houses abutting the development.

The National Planning Policy Framework (NPPF) supports an objection where "less than substantial harm" to a designated heritage asset is anticipated (s212). The proposed scale is inherently in conflict with the prevailing townscape, and this forms a reasonable basis for concern without needing formal visual assessments in early objection stages.

Each historic town has a unique morphology, social history, and built character. Unlike other towns that have undergone modern development, Newbury's historic core remains relatively intact and low-rise. The town's specific qualities—human scale, clear views to landmarks, and 19th-century civic structures—merit bespoke protections.

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The objection does not oppose development per se but opposes poorly integrated large-scale schemes. It welcomes regeneration that respects historic character, urban grain, and setting—principles found in both Historic England guidance and good urban design practices.

2. Relevant Conservation Principles

Historic England's 2008 guidance sets out six principles for the sustainable management of the historic environment. The following three principles are directly relevant to this case:

Principle 3: "Understanding the significance of places is vital."

Effective conservation depends on a clear understanding of the values and significance of a historic place. In this case, the Eagle Quarter proposal appears to overlook or inadequately assess the significance of Newbury's key landmarks and conservation area. Without a robust heritage assessment, the development threatens to introduce inappropriate scale and design elements that may undermine the distinctiveness and integrity of Newbury's historic character.

We spent much time yesterday studying the AVRs, some of the more significant of which were added at committee stage and after requests from the LPA. Useful as they have been, and I refer to a specific one later, they have not, in our view, got to the most valuable. In its letter of 24 Jan 24, Historic England notes that (I paraphrase marginally) "the effect of parallax as you get closer reduces the apparent scale of the proposed buildings; by contrast views from greater distance mean that the true scale of the development becomes apparent" This is more apparent if the view is from higher ground; even the A339 bridge over the river would reveal much more of the proposed development from the east, encompassing both Church and Town Hall. Go further to say Donnington Castle or high ground to the south of the town (perhaps the inspector might wish to do that) and imagine how the landmarks of Church and Town Hall, would be "complemented" by the proposal – much as, regrettably, the BT Tower currently does. These issues reinforce the argument that

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the significance of Newbury's historic environment has not been adequately or transparently evaluated.

Principle 4: "Significant places should be managed to sustain their values."

Sustaining heritage values requires sensitivity to not only physical fabric but also setting, scale, and visual relationships. The proposed eight-storey development is significantly out of scale with the predominantly two- to three-storey context of the historic town centre. Its massing and height are incompatible with the established townscape and may permanently alter the visual experience of important heritage assets and public spaces, thereby failing to sustain their aesthetic and communal values.

A precedent for sensitive large-scale development can be seen in the Parkway scheme in Newbury. Despite its size, the project was successfully integrated into the historic context, avoiding adverse impacts on the streetscape, and protecting the integrity of nearby Grade I and Grade II listed buildings. Additionally, the design of Parkway Newbury responded positively to its surroundings, complementing the adjacent park and landscape, and illustrating that contextually sensitive development is achievable. When the Parkway scheme was brought forward in 2008, Newbury Town Council submitted formal comments to the planning authority. Newbury Town Council did not object to the development itself, rather, the concern was around the reduction in affordable housing and funding for open spaces and that such reductions could set a precedent for future developments to seek similar concessions. This concern appears to remain relevant, as issues surrounding insufficient developer contributions continue to persist.

Principle 5: "Decisions about change must be reasonable, transparent, and consistent."

Planning decisions affecting the historic environment must be based on clear, evidence-based reasoning and transparent processes. The lack of adequate heritage impact assessment and public engagement raises concerns about the transparency

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and robustness of the decision-making process. The scale and prominence of the Eagle Quarter development necessitate more thorough justification and public scrutiny.

Although statutory consultation has occurred, effective engagement includes meaningful response to public concerns, which does not appear evident in the development. The scale of the development should have suggested a higher standard of transparency—possibly including extended community workshops.

Multiple local heritage groups, residents, and conservation advocates have raised concerns. This is not a fringe or isolated objection; it reflects a broader unease with the scheme’s integration and its impact on Newbury’s collective identity. Notably, the Newbury Society—a respected civic group dedicated to heritage and urban quality—is also a Rule 6 party to this inquiry. They are positioned to provide more in-depth information, expert analysis, and community perspectives that further substantiate the widespread and well-founded opposition to the current development proposal.

Heritage concerns are not inherently opposed to housing or regeneration. However, development should follow the principle of “constructive conservation”—enhancing significance while accommodating change. This proposal fails to strike that balance.

3. Specific Impacts on Key Heritage Assets

The proposed development threatens to adversely affect several key heritage assets within Newbury’s historic core:

3.1 St. Nicolas Church (Grade I Listed)

Constructed between 1509 and 1532, St. Nicolas Church is a quintessential example of Perpendicular Gothic architecture. Its tower is a defining feature of Newbury’s skyline and holds both architectural and symbolic importance. The proposed buildings’ size and bulk would significantly reduce the church’s landmark prominence, particularly when viewed from high ground. Views to the Church from closer in are key to its landmark function. The obstruction or visual crowding caused by tall new

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structures near a Grade I listed building is a material planning concern and triggers strong presumption against harm (NPPF §199). There is no evidence the proposed design incorporates meaningful measures to mitigate its relationship with the Church which has maintained its prominence since the 16th century. While minor urban evolution is natural, an abrupt skyline shift that compromises this visual prominence represents a marked departure from the town's historical pattern. The impact would constitute a major loss of significance.

3.2 Newbury Town Hall (Non-Designated Heritage Asset)

Completed in 1881, Newbury Town Hall features an asymmetrical façade and a prominent clock tower that commands the Market Place. The proposal's scale and height would visually compete with, and potentially overshadow, this historic civic building. The resultant change in townscape hierarchy could diminish the Town Hall's historical role as a focal point and erode the visual coherence of the surrounding conservation area. The issue is the loss of legibility in civic hierarchy; competing height and massing immediately adjacent to it will disrupt its intentional prominence and disorient the spatial logic of the civic core.

3.3 The Catherine Wheel & The Newbury

Whilst the Church and Town Hall do not share boundaries with the proposed development, two other historic and listed buildings do just that. The Catherine Wheel and The Newbury public houses would be simply dominated by the structures rising behind them and to their sides. It is significant that one of the AVR views missing in earlier submissions was that from Bear Lane showing the Catherine Wheel and its adjacent listed building. Having been generated by request during the committee stages, that image is now routinely used in media coverage of the Eagle Quarter application to demonstrate just what objectors are stating. Some attempt was made yesterday to suggest that the view from Bear Lane was not significant because in itself it was a poor area. Accepted that the BT Tower, KFC, and the Royal Mail vehicle yard are not great, but get towards the junction with Cheap Street, with

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those behind you, and a better prospect could be presented by wouldn't be if the Catherine Wheel and its neighbour were dominated by the Eagle Quarter. Two wrongs do not make a right.

Material or articulation treatments may improve façade quality, but they cannot offset the scale, dominance and overshadowing effects. True coherence requires volumetric and contextual sensitivity, not just surface design.

4. Impact on the Conservation Area

Newbury's conservation area is characterised by its human-scale development, historic street patterns, and cohesive architectural character. The insertion of high-density, large-scale modern buildings would create a discordant element within this context. This kind of intervention risks setting an unwelcome precedent for future developments, potentially leading to the gradual erosion of the conservation area's special character and historic significance.

Newbury's Conservation Area Appraisal identifies scale, historic grain, and cohesive character as defining features. Introducing bulk and height that overwhelm adjacent streets and landmarks runs counter to its intent.

Planning precedent is a legitimate concern, especially if future developers cite this scheme to justify similarly scaled buildings. Without tight design guidance or a masterplan, this is a real risk, not mere speculation.

Evolution is welcome when it is respectful, responsive, and additive to character. This proposal seeks to impose a new scale logic without deference to existing patterns or landmark relationships, which is regressive, not progressive, in urban terms.

5. The Eagle Quarter itself

While this statement has appropriately focussed on heritage (ie. what is in being before the development), I suggest that our discussions have not looked at what might be the heritage we leave to our successors should the development be built. I

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suggest that the feeling when one is within the scheme would be worse, in terms of the dominance of surrounding buildings, than if one were outside the scheme. It is worth also noting that the new street runs largely north-south, and given the height of the buildings, would be in shade for all but a brief time around the middle of the day.

6. Conclusion

The Eagle Quarter development, as currently proposed, represents an unacceptable and unjustified departure from the historic character, scale, and townscape integrity of Newbury's central conservation area. As demonstrated throughout this statement, the scheme conflicts with key principles set out in Historic England's Conservation Principles, Policies and Guidance (2008)—particularly in its failure to properly understand the significance of place, to sustain heritage values, and to meet standards of transparency and reasonableness in planning decision-making.

The proposed development would introduce large-scale buildings that are out of keeping with Newbury's historic morphology, crowding and overshadowing key heritage assets such as St. Nicolas Church, the Newbury, the Catherine Wheel and Newbury Town Hall. It risks eroding the legibility of civic landmarks and disrupting the visual coherence of the conservation area. While the harm may be categorised as "less than substantial" under the National Planning Policy Framework (§202), it is nonetheless material and must be outweighed by clear public benefits—none of which have been sufficiently demonstrated or proven to require this particular form and scale of intervention.

In its e-mail to the LPA on 25 Mar 24, Historic England's Principle Inspector says: "If the Council, having carefully considered the viability report, is content that a smaller, less harmful scheme would not be viable and thus the proposals need to be of the scale proposed in order to deliver the benefits claimed, it would be reasonable to conclude that there is a clear and convincing justification for the harm". Crucially, we now know that an alternative smaller, less harmful scheme is a possibility. The current planning

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application being considered under the generic “Old Town” title enjoys significantly greater support from Newbury Town Council; it is considered to be far more in keeping with the historical grain, visual logic, and civic identity of Newbury. The Town Council’s support underscores that regeneration and development need not come at the expense of heritage. Rather, it affirms that sensitive, contextually responsive design is not only possible, but preferred by those who understand the town’s character best.

This is not an objection to growth, housing, or revitalisation. It is an objection to a flawed and disproportionately scaled scheme that fails to respect the values of place. We urge the Inspector to uphold this objection and to recommend refusal of the current Eagle Quarter proposal, pending a more appropriate, heritage-sensitive alternative.

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