

The Newbury Society: Evidence in Chief (EiC): Heritage etc: Kennet Centre, Newbury, Berks ('Eagle Quarter II')

Appeal reference: APP/W0340/W/25/3359935.

Appeal re. West Berkshire Council application 23/02094/FULMAJ for the redevelopment of the Kennet Centre, Newbury RG14 5EN ("Eagle Quarter II"), with 427 flats etc. Evidence of David Peacock, chair of The Newbury Society [*For details of David Peacock, please see Appendix 1 to The Newbury Society's 'Proof of Evidence.'*]

Sub-topics: town character; scale/height/massing, appearance and townscape.

1.0 The Newbury Society considers that the proposed development is out of **scale** with the buildings of the existing town centre, and with the town centre conservation area; and would be harmful to the **character** of the town.

1.1 Scale, height and mass

This application is unacceptable in terms of **massing, scale, and height** in the southern part of the proposed development, in relation to Blocks A, B, C, D, E and S (these include buildings on the street frontages in Cheap Street, Bartholomew Street and Market Street, as well as Blocks A, B and S).

1.1.1 The current town centre, and this part of the town centre conservation area, consists primarily of buildings two- and three-storeys **high**, particularly on the street-frontages. We object to the 5- and 6-storey elements on the street frontages, and to the 7- and 8-storey elements at the heart of this scheme.

1.1.2 The central 8-storey Block S (with its 6-storey wing), and the 7-storey Blocks A and B (Block A with a 6-storey wing), together with the 6-storey Block D, and 5-storey Blocks C and E are not acceptable in terms of **scale, massing and height**. They would cause harm to the town centre and its **character**, at close, medium and long range.

The developers claim that all of (what they describe as) "perimeter buildings" proposed for this development, considered as a whole, benefit rather than harm the conservation area. Given the different phases and different dates of the Kennet Centre (see our Statement of Case, March 2025), there is considerable variety in the buildings they replace. In order to assess the level of benefit or harm, some of these "perimeter buildings" need to be considered individually. This can be best done by viewing a series of images.

[30 images in total, including photographs taken by David Peacock or John Handy (both local residents and members of The Newbury Society). The elevations and AVRs are those submitted by the developers Lochailort, cropped by the Newbury Society. Some of the elevations have also been darkened, in order to re-introduce some of the buildings which have been 'ghosted' behind the street frontage.]

[First, 17 images, nos. A-Q:]

A. Kennet Centre (Phase 1), Cheap St, from north (DP 2025).

This shows Cheap Street stepping-up towards the south, from 2- and 3-storey buildings, to Phase 1 of the Kennet Centre, with its dark bricks, which opened in 1972. This has 3 actual storeys on the street frontage, but the ground floor in particular is taller than a residential storey, so can be considered as between 3 and 4 storeys in height; and stepping-up again to the silver cinema block on the corner of Cheap St and Market St.

This part of the Kennet Centre was built before this area was designated as part of a conservation area. From the beginning this part of the Kennet Centre was out of proportion to its surroundings, including facing buildings, and this scale is part of the harm the existing building causes to the conservation area.

We do not consider that this view within the conservation area would be preserved or enhanced by increasing the height of the street frontage in place of the Kennet Centre here, as proposed. We consider that it would be harmed.

B. Kennet Centre (Phase 1), Cheap St, detail (DP 2025).

This is a detail of Phase 1, which is an extremely poor building, the worst of the agglomeration of buildings which make up the Kennet Centre. It was justified at the time by saying it was crucial to Newbury's economic prosperity. It is poorly detailed, and uses poor materials. When most people refer negatively to the Kennet Centre, this is what they have in mind. Virtually any design on the same scale would improve it, whether by rebuilding or re-fronting.

However, the developers' plans are not on the same scale; they would increase the height here to five storeys. We agree that the amended designs here (with the Robert Adam detailing) are an improvement on the original proposals by these developers for this site, with better detail. But they do nothing at all to address the disproportionate scale, increasing the height of this block, out of keeping with the buildings opposite and nearby.

To be clear, we agree that the removal of the current poor building here marks a benefit to the conservation area. However, the increase in height at this point in the street frontage, with the proposed replacement, causes harm to the conservation area, which reduces the heritage gain from its removal.

C. Market St, part of Kennet Centre (phase 1) and cinema (DP 2013).

The cinema complex (opened 2009) is out of scale with nearby town centre buildings, as can be seen clearly here, but it had widespread public support and was approved because of the significant public benefit in providing a cinema for Newbury; this should not open the door to even higher buildings.

On the left is another part of the poorest phase of the Kennet Centre (Phase 1), completed in 1972, with its dark brown bricks. Note that Block D (the six-storey block of flats proposed as the replacement) would be significantly taller than the cinema.

D. Market St, proposed Block D, S elevation, 6 storeys (2023 Dec).

Market Street presents the opportunity to create a largely new street-frontage which would enhance the town centre conservation area; and given the quality of the Phase 1 Kennet Centre buildings, the bar is fairly low. But the proposed designs for blocks of flats fail this test, because of their unsuitable **scale**.

The relationship between the **heights** of the cinema and Block D is clear here. We do not consider this to be an appropriate building in this street-frontage location in the conservation area. We do not consider that the six-storey **scale**, or their design (which owes nothing to existing buildings), would enhance the **character** of the conservation area, as claimed.

The heritage report for the developers [ME Heritage PoE 7.124 p. 77] describes this and the 6-storey end of Block S (further along Market Street) as presenting “an appropriate **scale** to their context,” using the nearby Weavers Yard as the parallel for the scale of its Market Street buildings. It fails to mention that the highest blocks of Weavers Yard (the blocks 6-storeys high) have their lowest two storeys in the railway cutting, reducing their **ridge height** and their impact on the townscape. The effective **ridge height** of Weavers Yard is five storeys, and this height is away from a main town centre street.

The comparison with Weavers Yard is at its most direct across Market Street, where Weavers Yard rises to three and four storeys. Block D, at 6 storeys, would be twice the height of the nearest Weavers Yard frontage. This is not “an appropriate **scale**.”

E. Proposed Block S, off Market St, E elevation, 8 storeys (2023 Dec).

This is the central building that the developers have proposed for Newbury town centre, a building they consider as appropriate for the conservation area. The **height** of this 8-storey building, its **scale and mass**, and the **character** represented by its design simply does not respond to the existing buildings in Newbury town centre. It has no precedent in Newbury; and it is being proposed without any sensibility to its effect on the **townscape**.

It may be inspired by “traditional Victorian warehouse typology,” as claimed [ME Heritage PoE 7.125 p. 77], but it does not reflect the history of the site and has nothing to do with Newbury.

The developers say essentially that **absolute height** should not be an issue here [“I do not think that this scheme on a policy basis can be expressed with reference to their absolute size...” ME Heritage PoE Summary 1.17 p. 4]. We consider that it is a valid issue for conservation areas in general; and it is clearly an issue in this conservation area, as specifically indicated in the Town Plan and Conservation Area Appraisal.

It is difficult for me to express just how wrong this building is, in this location: it seems obvious to The Newbury Society, to the town council, and to many Newbury residents. How can this possibly meet the guidelines for building in a conservation area? Who could possibly consider that the **scale, height and mass** of this Block would enhance this conservation area?

F. Market St, S end of Block S, 6 storeys, (AVR F, 2024 Nov).

At the moment, this is the site of the 1980s block with the plaques showing historic towns across southern England, including Newbury [see AVR F]. It is later and better than Phase 1: it is in orange brick, and the reliefs have local relevance. Replacing this with a bland six-storey block of flats is not an improvement. Together with the 6-storey Block D, these are too **high** and not suitable **character** for this conservation area. No attempt has even been made to respond to their surroundings by modifications such as setting-back the top storey, to reduce the impact of these buildings on the street frontage.

G. Bartholomew Street, Kennet Centre phase 4, 1989 (DP 2025).

The former Debenhams in Bartholomew Street is a fairly bland building, a characteristic made worse by the fact that it has been empty for several years. Yet it has a **scale** and uses materials which respond to its surroundings in the town centre, and it needs to be compared directly with its proposed replacement.

H. Bartholomew St, proposed Block E etc, W elevation (2024 Feb).

The right-hand side of this image shows the five-storey block of flats, of poor design, which would be significantly **higher** and worse than the former Debenhams building. Although categorised as a “perimeter building”, this has not been re-designed by Robert Adam. Looking at the proposed street-view for Bartholomew Street [*reproduced in ME Heritage PoE Fig. 6.6 p. 56*] makes the negative effect on the **town’s character** even clearer. The developers have argued repeatedly that replacing the whole of the Kennet Centre is a benefit or planning gain, yet here that is clearly not the case. Nor does it return the street to the previous “urban grain,” something achieved much more successfully for this street frontage in the “Old Town” proposals from the same developer. In terms of **height**, the left-hand building, to the right of The Newbury pub, is far more successful, and could be an asset if it were in place of the flats, and replaced by a three-storey building next to The Newbury.

I. Bartholomew Street, Kennet Centre phase 4, detail 1989 (DP 2025).

This, on the left, is part of the site for the 5-storey block of flats; and it is the proposed location of the vehicle access to the development’s only dedicated parking spaces, 83 spaces for its 427 flats; the entrance in an area which is currently pedestrianised.

J. Bartholomew St, proposed Block E, W elevation (2024 Feb) (part).

The 5-storey block of flats, **higher** even than the existing lift tower for the car park. The **scale and mass**, and even the colour, means that this is a detrimental change. This is not one of the “sympathetically designed buildings” mentioned by West Berkshire Council [WBC Hawkes-Reynolds PoE 4.18 p. 17] as part of the perimeter. If it were a stand-alone application, we consider it highly likely that it would be refused because of its **scale** and the harm it would case to the **character** of the conservation area. It does not reflect the design of existing buildings in the conservation area. The entrance shown is the vehicle access to the development’s parking spaces, and for servicing.

K. ‘The Newbury’ (former Bricklayers Arms), Bartholomew St (DP 2025).

The Newbury pub (the former ‘Bricklayers Arms’) is a two-storey building, a listed building, which should not have its setting compromised by **taller** buildings behind and in the street

frontage [*More later*]. This shows the wider context for the five-storey block of flats, and its impact on the street scene. The flats would be **taller** than the lift tower for the car park. The developers describe their perimeter buildings collectively as a benefit because they are “**small scale** buildings that are consistent with the prevailing streetscape” [ME heritage PoE 7.34 p. 68].

Moving around to the Market Place:

L. Market Place (nos. 17-19), Pizza Express etc (DP 2025).

This building, 17-19 Market Place, was erected in 1985 as part of Phase 2 of the Kennet Centre development (as the public access from the Market Place to the “speciality mall”). It is a clear example of what can happen when redevelopment takes full account of the scale, location, history and its surroundings.

This building was singled out for attention by Historic England, and it is probably the most positive part of the exterior of the Kennet Centre. This responds in **design, scale and urban grain**, and is a guide to what could be done in terms of redevelopment while retaining **character**. Although a relatively modern building, it is an asset to the Market Place. Its removal causes harm and is to be regretted.

M. Market Place, Kennet Centre entrance (DP 2025).

Although initially proposed as one long building which was closer in appearance to the former Debenhams, this 1980s entrance to the Kennet Centre was sub-divided to look like separate buildings on the suggestion of The Newbury Society, and although not great architecture, it does succeed in echoing the town centre **urban grain** which preceded it. Its **scale** is appropriate to the adjacent Catherine Wheel.

N. Cheap St, nos. 33-34 (former ‘Save the Children’), and 35 (‘Catherine Wheel’) (DP 2022).

The former “Save the Children” (now a convenience store) and The Catherine Wheel pub, two listed buildings in the conservation area. [*More detail of these buildings later*]

O. Cheap St, proposed Block C elevation, as amended (2024 Feb.).

The developers’ elevation, showing the proposed frontage to Cheap Street, rising to five storeys, as discussed earlier.

P. Cheap Street from Bear Lane, AVR C (2024 Nov.).

This view was produced by the developers very late in the decision-making process, well after the end of the formal consultation period. On its own it makes clear the harm which would be done to the conservation area, to the setting of two listed buildings, and to Newbury by the proposed development. This is the view described to this inquiry by the ward member for West Berkshire Council, Martin Colston, as “brutal.” Does this “preserve or enhance” the conservation area? We consider that the answer is a resounding “No.” The negative effect here is particularly from the **seven-storey Block A and its six-storey wing**, which are clearly damaging to the **character** of the conservation area. The **scale, mass and design** of Block A do not respect the conservation area or the listed buildings; and nor does the collective **massing** of the high-rise elements of this scheme. They result in considerable

and serious harm to the setting and significance of the listed buildings. This view and the elevation of Block S are central to our opposition to this development.

The viewpoint here is from Bear Lane, which is an important pedestrian access to the town centre, linking it to Sainsburys, to Mill Lane and King's Road, and leading off towards Newbury Racecourse. Bear Lane was also for over 50 years (1965-2019) the main vehicle entrance to Newbury town centre south of the River Kennet, from the A339 ("Police Station") roundabout. Although currently Bear Lane is one-way in the opposite direction, there is no guarantee that this is a permanent arrangement (- it is fairly predictable that one-way traffic flows will be altered when considered over decades). If access from the A339 roundabout were re-opened at any stage, this view would provide an abysmal vehicular "gateway" to the town centre.

Q. Some buildings facing the Kennet Centre in Cheap Street, including Downer (no. 44) (DP 2021).

Buildings affected by this development include not just the three listed buildings inside the Kennet Centre's Bartholomew St-Cheap St-Market St triangle, but other listed buildings facing the development (and, to a lesser extent, further afield); along with other heritage assets, such as this building, directly facing Block C. This is the unlisted 44 Cheap St, built c.1880, and designed by local architect James H. Money).

With the exception of the Pizza Express building (17-19 Market Place), none of the Kennet Centre can be described as high-quality architecture; but only for the first phase, with its dark-brown bricks, which opened in 1972, would demolition in itself be a benefit. This applies to sections facing Cheap Street (between the cinema complex and no. 33-34); and towards the eastern end of Market Street. Even here, there are limits to what would be acceptable as a replacement.

Phases 2, 3 and 4 of the Kennet Centre (*See our 'Statement of Case', March 2025, immediately following the 'Introduction'*) respond to other town-centre buildings in scale, mass and materials. For these (which include the two-storey frontages in Bartholomew Street and the Market Place), redevelopment should only be approved if it is an improvement on the existing.

1.2 Harm to the conservation area

We hope that the images have succeeded in demonstrating some of the harm which would be caused by the **height, scale and massing** of particular buildings to the **character** and significance of the Newbury town centre conservation area, as repeatedly recognised by Historic England.

1.2.1 The origins of the Newbury Town Centre Conservation Area date back to 1971. It was modified and extended in 1990, when for the first time it encompassed the whole of the Kennet Centre (Phases 1, 2 and 3 and 4). To be clear, the conservation area was extended to include the Kennet Centre after its completion (with the exception of the cinema phase).

1.2.2 Before the Kennet Centre, the Eagle Ironworks occupied only a small part of the Kennet Centre site, as shown on various Ordnance Survey maps of the area. This ironworks, also known as Plenty's, had low visibility. It was never the town-dominating ironworks which might be found elsewhere. None of its buildings rose to more than three storeys; and only the entrance was visible in the street-scene.

1.2.3 The *Newbury Town Plan* includes a statement that, for the whole of Newbury, "A general **height limit** of 6 storeys for flats is proposed, whilst respecting the building **heights** of the historic town centre." (*Newbury Town Plan 2019-2036*, 4.5 p. 21). The developers' heritage Proof of Evidence notes that the Town Plan was not identified as a material consideration by WBC officers in their January report [ME PoE 4.112 p. 25]. That was an omission, as it is very much a material consideration.

1.2.4 Historic England's view is that the harm which would result from the current proposal could not be reduced further without reducing the **scale** of the development, and we echo HE's view in calling for a development on a **smaller scale**, with **less height and mass**. HE states that this development "... would harm the significance of the conservation area, and the opportunity that redeveloping the Kennet Centre in a way that truly enhances the town would be missed." (Historic England, 20 March, 2024). [See also *TNS PoE Appendix 3*]

1.2.6 The Newbury Town Centre Conservation Area Appraisal and Management Plan (NTCCAAMP, adopted by WBC in Dec. 2024) sets five storeys as the maximum height for development in this area (Character Area 6): "The **maximum height** is brought by the Weavers Yard development [between Market Street and the railway station], at the equivalent of **five storeys**. Most buildings on Bartholomew Street (including the Kennet Centre and other modern buildings) comprise two or three storeys..." 11.78 p. 209 (Chapter 11).

This should be read in conjunction with the Appraisal (NTCCAAMP) guidelines for the design of new development, particularly GUI6: "b) It is advised that building heights for each character area respect the established building heights in the immediate area, as set out for each character area in Chapter 11..." (12.8 pp. 243).

1.2.7 The Appraisal (NTCCAAMP) specifically refers to the future development of the Kennet Centre: "GUI24: The Kennet Centre and the Council Offices would benefit from reconsideration with **sensitive** redevelopment whilst maintaining the surviving historic street pattern and **respecting the surrounding historic townscape**" (NTCCAAMP 12.30, "Specific Opportunity Areas" p. 250). The current proposals fail to satisfy these criteria.

1.2.8 The proposed development would be prominent in long-range views of the conservation area, including those from Enborne Road and Priory Road/Abbey Close, Goldwell Park and Donnington Castle.

[4 Images, R to U:]

R. Long view from Russell Road (JH 2025 Mar.).

This existing view shows St Nicolas Church from the west (Russell Rd). The view of the Grade 1 listed St Nicolas Church tower from Russell Road and from the Kennet Road allotments would be compromised by the addition of the 8-storey Block S (about the same height as the Telephone Exchange) and the 7-storey Block B to the skyline.

S. Long view from Priory Road (JH 2025 Mar.).

Location to be confirmed

T. Long view from Abbey Close (DP 2023 Aug.).

U. Long view from Goldwell Park (DP 2025 Mar.).

1.2.9 In these long-range views, it is clear that Block S in particular, and the higher elements of the scheme in general, would compete with the prominence of the Tudor tower to St Nicolas Church (listed Grade 1), and with the 1881 tower of Newbury town hall, designed by local architect James H. Money, causing harm to the townscape of the conservation area, and to the setting of the listed buildings.

1.3 Harm to the setting of listed buildings

This application would result in harm in varying degrees to the setting of 35 listed buildings in the neighbouring area (Listed in officers' report to WBC Western Area Planning committee Oct. 3, 2024, section 12.40 pp. 34-5), and other heritage assets. This includes buildings within the Kennet Centre 'triangle,' and those facing the Kennet Centre in Cheap Street and Bartholomew Street.

It would cause significant harm to the setting of three: the Catherine Wheel pub (35 Cheap St); the adjacent 33-34 Cheap St (the former "Save the Children"), and The Newbury pub in Bartholomew Street. All three have historic importance in their own right. They are important in the Newbury town centre streetscape, and for their contribution to the conservation area; and their significance is increased by their survival as representatives of the historic street frontage.

[Image V1:]

V1. 33-34 Cheap Street – detail of second floor, showing 'SAM' monogram (DP)

1.3.1 The former "Save the Children" and adjacent Classic Markings tattoo parlour in Cheap Street [33-34 Cheap St] is a 17th-century building, from the reign of King Charles II, and is listed Grade II. It is dated 1679 on the gables, which also carry initials understood to represent Samuel and Ann Merriman (see *Newbury Buildings...* 1973). These Merrimans do not appear to have been documented and few details of the building's 17th-century origin are currently known. However, Newbury is nationally important in the early rise of Nonconformity, and the Merriman family was closely involved in this, with Benjamin Merriman well-documented as a 17th-century Presbyterian minister in Newbury.

The frontage is triple-gabled and the second floor is tile-hung, like several other 17th-century buildings in the conservation area.

[Images V2-V3:]

V2. Catherine Wheel pub, 35 Cheap St, 1970s (Anon)

V3. Catherine Wheel pub, ship's wheel detail 2022 (DP)

1.3.2 The “**Catherine Wheel**” (35 Cheap St) has been an inn or pub at the heart of the community for over 300 years. The earliest record of which we are currently aware is a deed of May 13, 1725, leasing to Isaac Deacon “...All that one Messuage or Tenement commonly called or known by the name of the Katharine Wheel...” And it is mentioned in newspaper advertisements in the 1740s. It and its yard were a longstanding base for several carriers, servicing local villages including Kingsclere and Kintbury.

Its distinctive two-storey frontage includes battlements, a ship's-wheel plaque, mullioned windows and three Tudor-style chimneys. This frontage was added in the 1890s by local architect James H. Money (1834-1918), a prolific and significant figure in the design of local buildings, who was the architect of Newbury town hall. The builder was also Newbury-based, with a yard in West Mills.

The Catherine Wheel's **character** makes a strong positive contribution to the street scene and it is listed Grade II. Its impact is greatly affected by its surroundings, and the nearby buildings should not rise to a **height** which diminishes it in the street scene.

1.3.3 “**The Newbury**” pub [137 Bartholomew Street], formerly the “Bricklayers’ Arms” (it has been called “The Newbury” since 2012) is listed Grade II, and dates from the early 19th-century, although this is understood to be a replacement or remodelling of another pub known as the Half-Moon on the same site. As the “Bricklayers’ Arms,” it and its yard were a longstanding base for several carriers, servicing local villages including Brightwalton and Ramsbury. It uses the Georgian design and materials which contribute so much character to the town centre conservation area. Once again, nearby buildings should not rise to a **height** which diminishes it in the street scene.

1.3.4 The Conservation Area Appraisal (NTCCAAMP) refers specifically to the Bricklayers Arms [i.e. The Newbury], the Catherine Wheel Inn and 33-34 Cheap Street, saying “Whilst the Kennet Centre development has eroded the settings of these listed buildings, they are considered to be important survivors that make a **clear contribution to the streetscape and conservation area** as a whole.” (11.67 p. 194).

Other listed buildings affected

[Go forward 2 images to V5 (16 Bart St)]

[Images V4 & V5:]

V4. Former Crown Post Office, 40 Cheap St, 2018 (DP)

V5. 16 Bartholomew St, 2015 (DP)

1.4 Among the other listed buildings affected would be those opposite the Kennet Centre in Bartholomew Street and Cheap Street. These include:

Bartholomew St:

Nos. 16/17, mid-C18, altered.

No. 28, Grade II*, mid C18.

Particular attention should be given to the Georgian buildings, which form a significant part of the town centre character, and are not just “Remnants”, as described in the ME Heritage PoE [ref. 5.30-5.32 p. 33].

[Now go back 1 to V4 for the Post Office]

Cheap St:

No. 40 (former Crown Post Office), late C19.

No. 41, early C19.

No. 48, C17, refronted C19.

Nos. 49/50, C17.

[Now go forward 2 for detail of 44 Cheap Street]

[Image V6:]

V6. 44 Cheap St, window detail, 2016 (DP)

1.5. In addition, facing the Kennet Centre are a number of non-listed heritage assets, which add character to the street. Their quality can be illustrated by 44 Cheap St. (Downer), designed by local architect James H. Money, and recommended in the Conservation Area Appraisal (NTCCAAMP) for local listing.

Longer Views**[3 images, W1-W3:]**

W1. Tower to St Nicolas Church, c.1530s, 2018 (DP)

W2. St. Nicolas’ tower, from near Burger King, 2025 (DP)

W3. Clock tower to Newbury town hall, 1881, 2013 (DP)

[If possible, W1, then forward 2 to W3, then (for 1.7) back to W2]

1.6 In terms of **townscape**, Block S, in particular, would compete for prominence across this part of the conservation area with the tower to St. Nicolas Church (Tudor, perpendicular in style, built in the 1530s, listed Grade 1) and the clock tower of Newbury town hall (by James H. Money, 1881, listed Grade 2), its **height and mass** making it prominent in long-range views.

1.7 The development would involve the loss of some medium-range partial views, such as those of St Nicolas’ tower from near Burger King (see W2).

1.8 Local opinion opposes these plans, because of their scale. The Newbury Society organised a petition stating that they were “**too high** and overbearing for Newbury” and

“would harm the special **character** of this country market town.” We gathered 1,384 signatures (1151 online, 233 on paper). In addition, more than 90 letters of objection were received by West Berkshire Council, with only two *[sic]* in favour. Newbury Town Council has also consistently opposed this scheme.

In our experience, while most Newbury people would support modernisation or redevelopment of the Kennet Centre, they oppose the **scale, height and mass** of the development proposed in this application.

2.0 Heritage Benefits

2.1 [SoCG] We consider than many of the heritage benefits for this scheme claimed in the Statement of Common Ground [SoCG, April 28] either have little to do with heritage, or carry very little weight in assessing the heritage balance.

We could address each in term, but a few examples should suffice. First, we do not see why, even if it were to be accepted as a benefit, the *[quote]* “increased permeability” [SoCG section 11, first point] of the site should be rated as a heritage benefit.

In relation to the included statement “The perimeter block has been designed to reflect the historic plot pattern, form, [and] design character...”, [SoCG section 11, fourth point], we consider that while these might have been factors in the design process, the developers have not successfully achieved these aims; as we hope our presentation has demonstrated.

The statement that the development would include “animated and active commercial uses” [SoCG section 11, seventh point] is a statement of hope rather than fact, but the nature of the claimed heritage benefit is not stated.

And the claimed heritage benefits of the “new active frontages” [SoCG section 11, eighth point] need to be put in context. As West Berkshire Council has made clear [WBC PoE 5.3 (2nd) p. 21], the “new active frontages” need to be considered in relation to the buildings of which they form part, which in many cases have a scale harmful to the conservation area; taken as a whole, many of these Blocks should be rated as causing heritage harm, rather than as a benefit.

2.2 [Other alleged heritage benefits.] The developers’ heritage report claims, as one of the benefits of this scheme, *[quote]* “The redesign of the perimeter buildings along Bartholomew Road *[sic]*, Cheap Street and Market Place, further taking into account the vernacular of Newbury and the special interest of the town centre” [ME PoE 7.32.1 p. 68]. This claim needs to be judged against our presentation.

2.3 Where are the improvements to the settings of listed buildings which might be considered the heritage benefits of this scheme? We cannot see them.

Heritage Balance

3.0 We have struggled in attempting to assess the “Heritage Balance” in the terms used in the planning system. The Proof of Evidence for the developers says that the heritage harm should be rated at a low level of ‘Less Than Substantial Harm.’ We consider that the level of heritage harm is much higher, and have attempted (as non-experts) to quantify this, looking separately at the harm to the conservation area and the harm to heritage assets.

3.1 We consider there is a significant level of harm to the town-centre Conservation Area, and we would assess this to be at the lower end of ‘Substantial Harm,’ given that the development proposes change which would have a significant negative effect on the conservation area across a large area, substantially altering the scale and mass of its buildings, and compromising the market town character of Newbury. If this is not accepted by the inspector, then we would suggest that the harm is (at the least) a high level of ‘Less Than Substantial Harm.’

3.2 In separately considering Listed Buildings and other heritage assets, the plans do not involve the demolition of all or part of any listed buildings, and therefore we accept that the harm to heritage assets should be categorised as ‘Less Than Substantial Harm.’ However, they will cause significant harm to the setting of Listed Buildings the Catherine Wheel, 33-34 Cheap Street, and The Newbury, and harm to the setting of other heritage assets, listed and unlisted, particularly those facing the development in Bartholomew Street and Cheap Street. For buildings further away, including the Grade 1 listed St Nicolas Church, the degree of harm would be less, but the effect is still negative. Collectively, we consider this therefore to be a high level of ‘Less Than Substantial Harm.’

3.3 In assessing the heritage balance, we consider that the alleged heritage benefits of this scheme should be given a very low weight in the balancing process, and therefore that the balance in relation to heritage remains, as a minimum, at a high level of ‘Less Than Substantial Harm.’ The heritage case is therefore strongly against this development.

The Newbury Society
June 2025.