

The Newbury Society: Closing Statement 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.

We feel strongly that this development shows a lack of understanding of the character of Newbury, and would fundamentally change it in a negative way.

One of the major changes which would result is the change in scale. This is not a marginal or incremental change in the height and mass of the buildings of Newbury: it increases it by more than 50%.

There is no precedent for the eight-storey Block S, a disproportionate slab of a building in the heart of the town. This is 60% higher than any existing building in this area.

This would be about the same height as the Telephone Exchange, Newbury's architectural eyesore, approved by the GPO in the 1960s. The scale and design of this building have never been a model that other buildings should follow, and it is outside the conservation area.

The highest buildings in this part of the conservation area at the moment are the five-storey buildings included in Weavers Yard; and this is a relatively recent development, which itself raised building heights - the gable outside the offices where this hearing takes place carries the date '2021.' The majority of buildings in this area are two and three storeys high, with a handful at four. Nothing in this hearing has offered any justification for the increase in scale.

We do appreciate that there are many towns in which this development would be a benefit, and could be seen as a positive improvement. But any development needs to be related to its context, and this is where this development has failed.

[Amenity space]

The Newbury Society supported West Berkshire Council's refusal of permission partly on the grounds of a significant shortfall in Amenity Space. Arguments have been put forward to include categories of spaces not included in the council's original figures, and we are content to accept the council's view on whether some of these should now be included. However, in our non-expert view, the area of the North-South street should not be included in these figures, leaving the development still with a shortfall. In terms of "optimal" development, and good quality design, this remains a significant issue.

[Affordable Housing]

We have long-standing concerns about access to housing in the Newbury area. In relation to this application, we have become aware of some of the complexities involved in the Viability assessment as related to Affordable Housing, but remain disappointed that it has not been possible to include even a small number of affordable homes in this development.

[Parking]

As for parking, although this has been removed as one of West Berkshire Council's specific reasons for objection (which affected our ability to pursue the issue in the inquiry), we do have serious concerns about the overall impact this development will have on parking in Newbury, particularly in view of the increasing housing demands being placed on this area.

[Old Town]

The alternative "Old Town" scheme has been mentioned so many times in this hearing that it clearly does have some relevance to the Inspector's decision. While (given its complex nature) it would be unreasonable to ask the inspector review its documentation, a familiarity with the basic details of this scheme would be helpful to this decision, revealing it as a very different alternative scheme which is generally respectful of the conservation area, contrasting in issues such as numbers, style, and height, and with a good proportion of houses rather than flats. If the developers' "Old Town" exhibition at the Bartholomew Street premises remains in place, with its display elevations and plans, perhaps a visit there would be the simplest way to get a general sense of the nature of this proposal; alternatively similar views are likely to be available online.

[Planning Policy]

The broader issues of planning policy we are content to leave to West Berkshire Council, but we have clear views in terms of assessing the levels of heritage harm and benefit.

The developers' expert heritage witness Dr. Miele asserted that the five-storey section of Block E, in Bartholomew Street, which would become the most dominant building in this stretch of the street in spite of its poor design, would be a benefit to the town centre conservation area (not a building which causes minor heritage harm, not a building which is neutral, but a benefit). He said that the two six-storey blocks of flats proposed for Market Street were a benefit to the conservation area. He considered that the scale of Block S, in itself, caused no harm. These judgements form part of his overall assessment that the development overall presents no heritage harm; and this in turn is the sole basis for Mrs. Ballantyne-Way's judgement that the development presents no heritage harm. In our view, these judgements are simply wrong.

In addition, the Inspector may form his own judgement about the level of harm caused by the impact of the development in the views from Bear Lane and the south-east corner of the Market Place, featuring six and seven-storey elements of Block A; and (in the light of Dr Miele's comments) whether the contribution to this setting gives rise to an increase in the level of heritage harm from that indicated by West Berkshire Council, to that assessed by The Newbury Society.

As stated earlier, overall and after taking into account the heritage benefits, we consider that there is a high level of 'Less Than Substantial Harm' in terms of heritage, as there would be a considerable and negative change to the character of the Conservation Area, across a wide area; and harm to the setting of a large number of listed buildings in varying degrees, including serious harm to the setting of at least three.

Moving around the outside of the scheme:

[Bartholomew Street]

In Bartholomew Street the new street scene would be dominated by the five-storey section of Block E, which is the poorest of the street-frontages included in this scheme, and taller than anything else on the whole of the frontage along this street. This will impact on the overall character of the street, and the setting of its listed buildings, on both sides of the street. Looking into the development, there would be some views of the top storeys of Block B, and these too will have an impact on the significance of buildings in the street frontage.

[Market Street]

The street-frontage proposed for Market Street consists of the six-storey blocks of flats which a colleague of mine has accurately referred to as formulaic and “filing-cabinet architecture.” If these were being developed on their own, they would be the highest buildings in this part of the conservation area, and higher than the maximum height indicated in the town centre Conservation Area Appraisal. We appreciate that these Blocks do not affect the setting of listed buildings, but they are still in conflict with the Appraisal, not only in height. The Appraisal states “New development should ensure careful use of materiality, articulation and architectural forms/ features and respond to local traditional forms, detailing, character and pattern of development.” (CD 4.7, 13.10e). The developers not only propose 6-storey flats for this street, but put them directly on the street frontage, where the impact will be at its greatest and most harmful. This has a negative impact on the significance of the conservation area.

[Cheap Street]

A good scheme for Cheap Street would be one which enhances the significance of its listed buildings and other heritage assets. Instead, the increase in height of the replacement Block C by between 1 and 2 storeys will have a negative impact on the overall character of the street, and the setting of its listed buildings, which include three 17th-century buildings. This more than counteracts the improvements related to the Robert Adam designs here.

The setting of the Catherine Wheel and 33-34 Cheap Street will be heavily impacted, even bullied, by the 7-storey Block A and its 6-storey wing so close behind. The harm would be visible from a long length of Bear Lane, which is a well-used vehicle and pedestrian route, and from the south-east corner of the Market Place, for example from the entrance to the Elephant at the Market. Mrs. Ballantyne-Way, basing her conclusion on Dr. Miele’s report, describes the harm here as “minor” (PoE 4.9 p. 28), but we do not agree.

The NPPF makes it clear that the significance of a heritage asset derives not only from its presence, but from its setting. And it states that elements of a setting may make a negative contribution to the significance of an asset (NPPF, CD 4.1, annex 2, p. 78). It is difficult to imagine a more serious negative impact on the setting of a listed building, given the proximity of the new development, the height and mass of the buildings involved, and the lack of sensitivity put into the design in relation to these buildings at this location. The development seriously harms the significance of the listed buildings.

And then to the higher Blocks:

[Blocks A, B and S]

We object to the disproportionate Blocks at the heart of this development, A, B. and S, which are entirely unsympathetic in design and scale to the urban character of central Newbury, and completely lacking in sensitivity. For Block S in particular, the over-large warehouse-inspired design (as seen in the east elevation) seems entirely unsuited to Newbury and to this conservation area.

[NTCCAAMP]

We consider that the **optimal** development on this site, the **best** use of the site, would not be the proposed development, but one which conforms to the contents of the Newbury Town Centre Conservation Area Appraisal (CD 4.7). This is an up-to-date document, adopted last December after an extensive process of consultation lasting several years, to which (if I understand them correctly) the developers themselves contributed, and which sets out a range of criteria for development across the conservation area, with specific references to this part of the area and to the Kennet Centre itself.

It should be noted that for a period beginning well before the adoption of the Appraisal in December 2024 and continuing beyond the officers' recommendation to approve this application at the district planning meeting in January, (as we understand it), West Berkshire Council had no conservation officer in post.

The Conservation Area Appraisal (CD 4.7, point 11.78, internal page 209) concludes in straightforward terms that in this area, the maximum building height should be five storeys. This is not an arbitrary judgement, it is a weighed and considered conclusion, along with equivalent area-specific conclusions in other parts of the conservation area. The developers may argue that this is guidance, but this maximum is important when considering "optimal" development; and Block S represents a hefty 60% increase on this, from five storeys to eight.

The Appraisal specifically states that the Kennet Centre "would benefit from reconsideration with sensitive redevelopment, whilst maintaining the surviving historic street pattern and respecting the surrounding historic townscape" (CD 4.7, 12.30, GUI24 p. 250).

And it states that "...designated heritage assets and positive contributors should be preserved and new development must be carefully designed to respect their scale, height, character, setting and significance." (13.10c).

For many years The Newbury Society led heritage walks around the town centre, highlighting and promoting the town's architecture and links with its past; and I am among the current group of people leading heritage walks, now under the auspices of Newbury Town Council. We have developed a detailed appreciation of the town's heritage, which is one reason why we have taken a strong view in relation to this development, and why we are here at this inquiry.

We consider that much weight should be given, in reaching a decision, to the existing character of Newbury and the character of the town centre conservation area. This character has not always been easy to define or quantify. Some of those who sent in objections to the current development expressed their opposition by declaring that “Newbury is not Basingstoke,” or in similar terms. The contrast with Basingstoke is pertinent, as both were market towns with many similarities until the 1960s. The current proposals represent a significant step-change toward Basingstoke-style development, a fundamental and damaging change in scale in the existing conservation area.

As Historic England wrote, the plans would “harm the significance of the conservation area,” adding [quote:] “Newbury is a very fine market town. Not only does it contain many historic buildings (most of which are listed) but the historic centre is a remarkably cohesive and attractive place (and thus designated a conservation area).”

“The site in question [*the Kennet Centre site*] is made up of modern buildings which are not of historical or architectural interest in themselves, but the land on which they stand formed part of the core of the medieval town. What is built here would have a major impact on the character of the place as a whole.” [Historic England, extracts from letter of 20 March 2025.]

We urge the Inspector to support the council’s decision, and reject the appeal.

The Newbury Society
June 2025