

# Memorandum: Consultee Response

<b>TO:</b>	Brian Conlon	Direct Line:	
<b>FROM:</b>	Jonathan Mullis	<b>Ext No.</b>	0118 946 7000
<b>Consultee:</b>	Historic Buildings Consultant	<b>Dated:</b>	24-6-20
<b>Ref:</b>	200328		
<b>Proposal:</b>	Outline planning permission for Demolition and redevelopment to comprise up to 115,000 sqm GEA in one or more land uses comprising Residential (Class C3 and including PRS), Offices (Use Class B1(a), development in Use Classes A1, A2, A3 (retail), A4 (public house), A5 (take away), C1 (hotel), D1 and D2 (community and leisure), car parking, provision of new plant and renewable energy equipment, creation of servicing areas and provision of associated services, including waste, refuse, cycle storage, and lighting, and for the laying out of the buildings.		
<b>Location:</b>	Vastern Court Caversham Road, Reading		
	<b>DWG / Doc Ref:</b>		

## Legislative and Planning Policy Framework

### Planning (Listed Buildings and Conservation Areas) Act 1990

Recent legal cases relating to issues of the setting of listed buildings have established that under section 70(3) the general power to grant planning permission under section 70(1) is expressly subject to sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Section 66(1), in the determination of applications affecting the setting of a Listed Building, states that:

*'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.'*

### Setting of Listed Buildings Case Law

In the case (2014) of East Northamptonshire District Council v. Secretary of State for Communities and Local Government (known as the 'Barnwell Manor' case) the Court of Appeal held that section 70(1) was expressly subject to section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and that decision-makers should give 'considerable importance and weight' to the desirability of preserving setting of a listed building(s).

In the Barnwell Manor wind-farm case it was established that it did not follow that, if harm to a listed building was found to be less than substantial under the balancing exercise in policies HE9 and HE10 (NB: under PPS5 which was then in force), that a decision-maker could ignore the overarching duty imposed by section 66 (of the Act).

### Case Law

Recent legal cases have clarified cases relating to issues of the setting of listed buildings under the Planning (Listed Buildings and Conservation Areas) Act 1990.

In the case (2014) of East Northamptonshire District Council v. Secretary of State for Communities and Local Government (known as the 'Barnwell Manor' case) the Court of Appeal held established that under section 70(3) the general power to grant planning permission under section 70(1) is expressly subject to sections 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and that decision-makers should give 'considerable importance and weight' to the desirability of preserving setting of a listed building(s).

The Barnwell Manor wind-farm case judgement established that it did not follow that, if harm to a listed building was found to be less than substantial under the balancing exercise in policies HE9 and HE10 (NB: under PPS5 which was then in force), that a decision-maker could ignore the overarching duty imposed by section 66 (of the Act).

### National Planning Policy Framework (NPPF) 2018

In March 2012, the Government published the National Planning Policy Framework (NPPF), which replaced the National Planning Policy Statements (PPS) and Planning Policy Guidance (PPG). The NPPF was subsequently updated in 2018. The NPPF sets out a presumption in favour of sustainable development and a key dimension of 'sustainability' is defined as '*...protecting and enhancing our...historic environment*' (DCLG et al, 2018).

The NPPF recognises the historic environment as comprising all aspects of the environment which have resulted from the interaction between people and places through time (DCLG et al, 2018, Annex 2: Glossary). The elements of the historic environment that are considered to hold significance are called heritage assets (DCLG et al, 2018, Annex 2: Glossary).

The NPPF identifies heritage assets 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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).*

The glossary annexed to the NPPF defines the setting of a heritage asset as:

*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

The NPPF (paragraph 189) requires that:

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

Paragraph 190 states:

*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.*

Paragraph 192 of the NPPF states that, local planning authorities should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

Paragraph 193 states that:

*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is **irrespective** of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*

Paragraph 194 states:

*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 195 states that:

*Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

Paragraph 196 states that:

*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

Paragraph 197 states that:

*The effect of an 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.*

Paragraph 200 states:

*Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.*

### **Planning Practice Guide (PPG)**

The Planning Practice Guide (PPG) (2014) clarifies this additional requirement under 'What is the main legislative framework for planning and the historic environment?' where it states that:

*In addition to the normal planning framework set out in the Town and Country Planning Act 1990.....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.*

*Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan. (See ID 18a-002-20140306).*

PPG states that local planning authorities may identify non-designated heritage assets and in some areas, these heritage assets may be identified as 'locally listed' (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions but which are not formally designated heritage assets (DCLG et al, 2014, para. 39).

The PPG states under 'Why is 'significance' important in decision-taking?' that:

*Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.*

Under the discussion of 'How to assess if there is substantial harm?' the PPG offers:

*What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.*

The PPG states under 'What is the setting of a heritage asset and how should it be taken into account?' that:

*A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Setting is the surroundings in which an asset is experienced and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.*

*The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.*

*When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).*

## **Reading Borough Planning Policies**

The Reading Local Plan Adopted 2019 is the document that contains the policies for how Reading will develop up to 2036, which is the end date of the plan. It replaces the three previous development plan documents – the Core Strategy (adopted 2008, amended 2015), Reading Central Area Action Plan (adopted 2009) and Sites and Detailed Policies Document (adopted 2012, amended 2015). It identifies the amount of development that will take place, the areas and sites where development is expected to be accommodated, and where it will be restricted, and sets out policies for how planning applications will be decided. Reading, has launched a 2050 vision for the town as a smart and sustainable city by 2050. The vision entails:

*6. Maintain and enhance the historic, built and natural environment of the Borough through investment and high quality design, and capitalise on these assets to contribute to quality of life and economic success;*

### **EN1: PROTECTION AND ENHANCEMENT OF THE HISTORIC ENVIRONMENT**

*Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include:*

- *Listed Buildings;*
- *Conservation Areas;*
- *Scheduled Monuments;*
- *Historic parks and gardens; and*
- *Other features with local or national significance, such as sites and features of archaeological importance, and assets on the Local List.*

*All proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance. Any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits.*

*Applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings.*

*Applications which affect Historic Parks and Gardens will safeguard features which form an integral part of the special character or appearance of the park or garden. Development will not detract from the enjoyment, layout, design, character, appearance, features or setting of the park or garden, key views out from the park, or prejudice its future restoration.*

*Applications which affect, or have the potential to affect, the significant features of heritage assets should be justified by a Heritage Statement.*

*The Council will monitor buildings and other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk including consideration of appropriate development schemes that will ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers.*

*Where there is evidence of deliberate neglect or of damage to a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.*

### **EN6: NEW DEVELOPMENT IN A HISTORIC CONTEXT**

*In areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:*

- a. The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);*
- b. Sensitivity to historic context;*
- c. Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing);*
- d. Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.*

Additional Reading Borough Council guidance is provided in:

#### **Reading Tall Buildings Strategy RBC, 2008):**

As noted in the Tall Buildings Strategy:

*In terms of the historic environment, the Local Plan seeks to protect Conservation Areas, the setting of Listed Buildings, historic parks and gardens and Scheduled Ancient Monuments through policies CUD7, CUD4, CUD10 and CUD11 respectively.*

### **Historic England Good Practice Advice**

Historic England has produced new guidance on the interpretation and implementation of the NPPF and PPG with regard to the historic environment in the form of:

- Historic England *Good Practice Advice in Planning Note 1: Conservation Area Designation, Appraisal and Management* (Historic England, 2016);
- Historic Environment *Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking* (Historic England, 2015a);
- Historic Environment *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Historic England, 2015b); and
- Historic England *Good Practice Advice in Planning Note 4: Tall Buildings* (Historic England, 2015c).

Historic England *Good Practice Advice in Planning Note 4: Tall Buildings* (Historic England, 2015c) states:

*However, if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place. What might be considered a tall building will vary according to the nature of the local area. A ten-storey building in a mainly two-storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not. One of the principal failings in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character. There have been many examples of tall buildings that have had a lasting adverse impact through being unsuitably located, poorly designed, inappropriately detailed and badly built and managed.*

### **National Design Guide**

National Design Guide: Planning practice guidance for beautiful, enduring and successful places (Ministry of Housing, Communities and Local Government, 2019) states:

7 *Well-designed places and buildings are influenced positively by:*

- *the history and heritage of the site, its surroundings and the wider area, including cultural influences;*
- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;*
- *the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details.*

### **Reading Borough Planning Policies**

The Core Strategy 2008 (with further alterations January 2015), Policy CS33: Protection and Enhancement of the Historic Environment states:

*Historic features and areas of historic importance and other elements of the historic environment, including their settings, will be protected and where appropriate enhanced. This will include:*

- *Listed Buildings;*
- *Conservation Areas;*
- *Other features with local or national designation, such as sites and features of archaeological importance, and historic parks and gardens.*

*Planning permission will only be granted where development has no adverse impact on historic assets and their settings. All proposals will be expected to protect and where appropriate enhance the character and appearance of the area in which they are located and for the purpose of ensuring that work is appropriate to the special architectural or historic interest of the listed building.*

Within paragraph 11.8 of the Core Strategy it also specifies that:

*The Borough Council is committed to protecting and where appropriate, enhancing the Borough's historic environment. This includes ensuring that buildings and features of Local architectural and historic interest (which are not necessarily recognised components of the historic environment) are taken fully into account and safeguarded...".*

The Reading Station Area Framework (2010 (RSAF) is also relevant as is the Tall Buildings Strategy (2010)

### **Historic England Good Practice Advice**

Historic England has produced new guidance on the interpretation and implementation of the NPPF and PPG with regard to the historic environment in the form of:

- Historic Environment *Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking* (Historic England, 2015a);
- Historic Environment *Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (Historic England)
- Advice Note 4 - Tall Buildings (Historic England 2015)

Historic England's *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking* (Historic England, 2015a) states that:

## **Cumulative Change**

*The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. (Historic England, 2015a, p.8).*

## **The Setting of Heritage Assets**

Historic England's published document *The Setting of Heritage assets* includes their methodology for the assessment of the impact on the settings of Listed Buildings from development proposals. They suggest the following process:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance; and
- Step 4: explore the way maximising the benefits

Historic England's guidance in *The Setting of Heritage assets* on appreciating the setting states:

*Because setting does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.*

## **Listed Building Description**

The settings of the following buildings would be directly affected by the proposed development:

- Great Western House (Grade II) - now occupied as a Malmaison Hotel with a Starbucks at ground floor;
- 13 and 15 Station Road (Grade II);
- The statue of King Edward VII (Grade II); and
- Main building of Reading Station (Grade II).

Reading General Station is Grade II Listed. Built 1865-67, architect Mr Lane (Chief Engineer of the GWR Co) and an enlargement and remodelling of Isambard Kingdom Brunel's original station of circa 1840. The building is described as:

*Italianate details. Two storey symmetrical main building of buff brick from Coalbrookdale with Bath stone dressings, rusticated quoins. 10 bays wide, slight break to centre 4. Frieze, moulded cornice and blocking course, the projecting centre having console brackets to the cornice and the blocking course raised as solid pediment. The ground floor of the centre break has guilloche frieze and panelled pilasters with wreath caps flanking the windows and doorways. Cornices on console brackets over 1st floor windows, with triangular and segmental pediments over those in centre break. Canopy across ground floor. Hipped slate roof, chimneys removed. Pleasant central cupola, which has round headed lights and bracket eaves to pyramidal roof with finial. Canopy extends over ground floor extensions on both sides, about 12 bays to left and 7 to right.*

Great Western House, formerly listed as Former Great Western Hotel, is described as:

*One of the 1st Railway Hotels in Britain. 1844 Italianate. 3 storeys and basement. Stucco with rusticated quoins. Ground floor channelled. 5x3 bays divided by pilasters supporting an entablature and boldly projecting modillion cornice. Glazing bar sash windows with architraves. Balustraded balcony, frieze and cornice to 1st floor windows, centre with pediment. 2nd floor windows with bracket cornice. Central projecting portico with full Doric order and paired columns. 2 bay canted extension to right in matching style. North front has central bowed 3 light bay with cornice over on ground floor. High panelled parapet over cornice. Later 4 storey extension to left with carriage entry. Moulded coping to parapet. 2+1 bays. Modern extension to south. Similarities with Royal Station Hotel at Slough suggest I K Brunel as architect or one of his assistants. Balustraded area to street with heavy balusters. Curved to station approach corner.*

The proposed site is within 360m of the boundary of the Market Place/London Street Conservation Area. The Market Place/London Street Conservation Area includes the following buildings:

- Grade II\* Town Council Chamber and Offices with Clock Tower
- Grade II Municipal Buildings Concert Hall
- Grade II Municipal Buildings Art Gallery and Museum
- Grade II Municipal Buildings School of Art
- Grade II Walter Parsons Corn Stores

## **Proposals**

The proposals are for the demolition of the existing buildings to the immediate north of Reading Station and its replacement with buildings on four plot (A, B, C and D). The site was formerly occupied by Aldi, The Range, Mothercare, Majestic Wine TGI Fridays and associated surface car parking and service yards.

## Discussion

The verified view provided in the supporting Volume 1 of the Environmental Statement Main Report (Appendix 1.6)(see below) shows that the proposed building would be located directly behind the clock tower of the Grade II Listed Building when viewed in the main approach to the station by foot-passengers along Station Road. The impact would be visually harmful and disrupt the aesthetic value of the principal elevation of the Listed Station, in what is the main public view of the station afforded to passengers using it.



In fact the Design Code supplied in support of this application shows that the designers, based on the Reading Station Area Framework, have taken it literally to mean that future developments should be highest closest to the Station. However, in this case the proposed building would be directly behind the station providing the highest building on Plot D. This is a misinterpretation of the framework and basic design principles when dealing with a sensitive settings, such as that of the Listed Buildings. In any case this is a framework guide and does not take precedence over the statutory requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, as determined in the case of Barnwell Manor and others.

According to the design parameters provided, Plot D, directly behind the Grade II Listed Station Building, would reach a maximum of 112.9m AOD, the Plot C a maximum of 94.4m AOD, Plot B a maximum of 92.8m AOD, and Plot A, a maximum of 94.4m AOD. The supporting documentation for this scheme confuses matters by referring to the heights of proposed towers only in metres when reference should be to storey heights, but indicatively, Plot D would be up to 23 storeys high.

It should be noted that the Station Area Framework states:

6.22 The benchmark height is the general recommended height for each area. The benchmark height is defined in commercial storeys, not metres and does not exceed ten storeys because this is the point at which tall building controls and design guidance applies. As a general rule, 10 commercial storeys equate to 12 residential storeys.

Therefore, as stated in the RSAF, over 10-12 storeys, RBC's Tall Buildings guidance will take effect. In the Tall Building strategy it is a General Principle that such buildings should:

- Take account of the context within which they sit, including the existing urban rhythm, local architectural style, fine grain urban detail and historic setting;
- Avoid bulky, dominant massing;
- Avoid detrimental impacts upon conservation areas and listed buildings;
- Use high quality materials that reference their physical, cultural and historic surroundings

In addition, Historic England's guidance on Tall Buildings (Advice Note 4) in a historic setting, deals with the statutory requirements of preserving the settings of Listed Buildings:

1.2 However, if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place. What might be considered a tall building will vary according to the nature of the local area. A ten-storey building in a mainly two storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not. One of the principal failings

*in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character. There have been many examples of tall buildings that have had a lasting adverse impact through being unsuitably located, poorly designed, inappropriately detailed and badly built and managed.*

The supporting Planning Statement states:

*4. The proposed maximum height parameter for Plot D, is up to 112.9m AOD. This will enable a building of over ten storeys to come forward at reserved matters stage, in accordance with the above RSAF aspiration. As with building density, the maximum heights proposed reduce east to west. Also, the proposed maximum height parameters reduce along the Vastern Road frontage, to respect the existing residential properties on the northern side of Vastern Road.*

As detailed in the Built Heritage assessment of the Environmental Statement the:

*"...height and massing of the proposed development would have an adverse effect on the setting of both the Grade II listed Main Building of Reading General Station and the Grade II listed Great Western Building, due to their proximity....The resulting effect on this heritage asset would be adverse and significant. All other heritage assets would not experience significant adverse effects." (Environmental Statement).*

The ES also outlines the cumulative effects of the proposed development and surrounding cumulative schemes on the Built Heritage. This would have significant adverse effects on the setting of a number of surrounding heritage assets including the Reading General Station; the Great Western House; and 13 and 15 Station road, which are all Grade II listed buildings. The Townscape and Visual Assessment of the ES also states:

## **25. View north from Station Square**

*The temporary demolition and construction stage of the proposed development would be seen in the backdrop against the skyline above the Main Building of Reading General Station (Grade II Listed) in addition to the demolition and construction activities for Network Rail Thames Valley site office/Former Royal Mail site, should they coincide. The demolition and construction stage of the proposed development would extend the amount of view demolition and construction activities are visible in behind the historic station building where it would cause a Medium magnitude of impact. This would result in a Moderate Adverse cumulative effect.*

*The proposed development would be seen in addition to the reasonably foreseeable scheme of Network Rail Thames Valley site office/Former Royal Mail site, where it would occupy the same section of views but would extend the amount of view that tall buildings are visible against the skyline and reduce the prominence of the Main Building of Reading Station (Grade II Listed) causing a Medium magnitude of impact. However, the proposed development in addition to the Network Rail Thames Valley site office/Former Royal Mail site would introduce built form with variety in massing and heights. This would result in a Moderate Adverse cumulative effect as it would alter the composition of the station building in close range view.*

It should be noted, as stated in RSAF, that:

*Benchmark heights are not guarantees and may be modified downwards where it becomes clear that proposed buildings will harm residential amenity or affect the setting of listed buildings, important views or open spaces.*

*New buildings, whether or not they lie within the boundaries of a Conservation Area, will be expected to make a positive contribution to the area and they should conserve and where appropriate enhance the character or appearance of Conservation Areas and conserve the setting of listed buildings.*

## **Conclusions**

The proposed development's heights and building locations (Particularly Plot D) would detract from the setting of the Grade II Listed Reading Station in views towards its principal elevation, harming its aesthetic, historic and communal value as a Listed Building.

Whilst there have been a number of additions to Reading Station over the years, of variable quality, this view of the principal elevation has always been maintained. The impact of the proposals would also affect views from the Grade II Great Western House (Malmaison) with similar, though lesser impacts on Nos. 13 and 15 Station Road (Grade II); and the statue of King Edward VI' (Grade II).

The application site also lies 360m north of the Market Place/London Street Conservation Area and is also likely to be visible from the Conservation Area, which preserves aspects of the medieval centre of Reading and fine examples of Georgian and Victorian architecture.

Whilst there is no objection to the demolition of the existing buildings and development of the site, any proposed development needs to be sensitive to its context. The proposals do not respond positively to the setting of the Listed Buildings and would have an adverse effects on them, and in particular the setting of Reading Station, harming its aesthetic, historic and communal values as a Listed Building. The proposed larger height of the building on Plot D in fact maximises the visual impact of the proposed development directly on the principal view of Reading Station. As Station Road is an important access route towards the Reading Train Station, this would blight one of the main public views of

visitors to the town.

The NPPF also makes it clear that the Government attaches '*great weight*' to the conservation of designated heritage assets, including their settings (paragraph 132), and '*great importance*' to the design of the built environment (paragraph 56). The design policies in paragraphs 56 to 68 make several references to the importance of good design responding to local character and history, and integrating new buildings into the historic environment. In addition, the NPPF confirms that the significance of heritage assets derives not only from a heritage asset's physical presence, but also from its setting (paragraph 132). The Barnwell Manor test case means '*considerable importance and weight*' must be given to the desirability of preserving setting of listed buildings.

The proposed development is not considered to achieve the statutory requirement to preserve the settings of the Listed Buildings and would harm the setting of the Conservation Area, contrary to the statutory requirements of Sections 66(1) and Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the requirements of Reading Local Plan heritage policies and guidance in the NPPF and PPG as well as the guidance in the Reading Station Area Framework (RBC, 2010) and Reading Tall Buildings Strategy (RBC, 2008).

<b>Summary</b>	Please see above.
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